EVALUATING THE EFFECTIVENESS AND EFFICIENCY OF THE CHRISTCHURCH CITY PLAN

Project Report

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Evaluating the effectiveness and efficiency of the Christchurch City Plan

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Report Authors

RESPONSEPLANNING is a specialist planning consultancy established in April 2004. It provides resource management policy development, planning and implementation services for a range of clients across government, business and community sectors. At the core of its practice is developing, analysing and implementing policy within resource management processes. The authors of this report are all professionally qualified and experienced resource management planners.

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1 EXECUTIVE SUMMARY

1.1 Evaluation Approach

This report evaluates the effectiveness and efficiency of the policies, rules, or other methods in the Christchurch City Council City Plan (City Plan) in accordance with section 35(2)(b) of the Resource Management Act 1991 (RMA).1

The primary purpose of the evaluation is twofold:

1. To fulfil the requirements of Section 35(2)(b) and (2A) of the RMA to monitor the effectiveness and efficiency of the City Plan at intervals of no more than 5 years.

2. To shape the future review of the City Plan.

In addition, the evaluation will provide a base-line for future City Plan monitoring and be used to inform the future development of the City Plan monitoring programme.

Section 35(2)(b) of the RMA focuses on how effective and efficient the policies and methods in the City Plan are in achieving (or otherwise) the natural and physical resource objectives set out in that Plan. In part, the evaluation of effectiveness is a measure of the degree of influence of the City Plan. That is, the achievement or otherwise of the objectives must be because of its policies and methods, not the result of other influences such as the economic conditions and societal preferences. Therefore, the evaluation must focus on those matters that the City Plan is empowered to control, which relates to subdivision, changes in land use, noise, and activities on the surface of water, all excluding activities within the coastal marine area.2

To summarise, in this report:

1. **Effectiveness** means how successful a provision is in achieving the stated objective.

2. **Efficiency** means whether the benefits of the provision outweigh the costs, either immediately or over time.

The key limitations to the evaluation are:

1. The brief is to examine the effectiveness and efficiency of the City Plan policy and methods. This does not include considering what the appropriate objectives of the City Plan are, or forming an overall judgement as to the appropriateness of the policies and methods.

2. The evaluation is limited to the use of existing information. This restricts the evaluation of those provisions of the City Plan for which there is no existing data.

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1 See Methodology for monitoring the effectiveness and efficiency of the Christchurch City Plan (Section 35(2)(b) of the RMA) dated 13 April 2010 and adopted by the Christchurch City Council on 20 April 2010.

2 Coastal marine area means the foreshore, seabed, and coastal water, and the air space above the water—

(a) Of which the seaward boundary is the outer limits of the territorial sea:

(b) Of which the landward boundary is the line of mean high water springs, except that where that line crosses a river, the landward boundary at that point shall be whichever is the lesser of—

(i) One kilometre upstream from the mouth of the river; or

(ii) The point upstream that is calculated by multiplying the width of the river mouth by 5

(Sec 2 of the RMA)
3. The existing information is of variable coverage and quality. This is largely due to the use of data-bases managed for other purposes, and the control of information entered into those data-bases.

4. The lack of engagement with plan users. To overcome this we have applied our direct and indirect experience of using the Plan, but expect that engaging with other plan users will highlight other nuances. This can occur as part of the City Plan review process.

Part way through the evaluation, and falling outside the evaluative period, the 4 September earthquake occurred. We consider that this effectiveness and efficiency evaluation remains relevant.

To make the evaluation manageable, the City Plan is divided into three evaluative categories: detailed, simple and narrative. Each category is then further divided into a number of groups of provisions that have matters in common. Within the detailed evaluative category are those groups of provisions for which a thorough understanding of their effectiveness and efficiency will potentially provide significant benefits to the City Plan review. A comprehensive evaluation is undertaken. The simple evaluative category contains groups of provisions where the effectiveness and efficiency can be understood from a more shortened evaluation while still informing the City Plan review. For these groups a simpler strategic evaluation is undertaken. Within the narrative category are those groups of provisions which decisions have already been made to review them, or the evaluation is unlikely to result in additional meaningful information for the upcoming City Plan review. For the narrative groups, no evaluation is undertaken.

Within this report findings and recommendations are made in relation to the: efficiency at the City Plan level; the effectiveness and efficiency of the City Plan for each detailed and simple evaluative group; and the overall effectiveness and efficiency of the City Plan. This section summarises the key findings and recommendations, grouped by the:

1. Key City Plan achievements, which summarise the strategic achievements of the City Plan
2. Identified opportunities for City Plan improvements, which identified a number of effectiveness and efficiency improvements that could be made
3. City Plan implementation in achieving City Plan outcomes, which identifies the role early engagement with resource consent applicants can have in achieving the City Plan outcomes sought.

1.1.1 Key City Plan Achievements

The City Plan has been highly successful at managing a number of significant resource management issues for the city. The following achievements are noteworthy:

1. Growth of the City – the City Plan is successful in accommodating urban growth in a manner that achieves the primary focus of a compact and consolidated form. The City has not experienced sporadic or ad-hoc urban growth outside the urban boundary. Residential development is resulting in increased density of development within the urban area of the City.

2. Form of the City – the City Plan is generally successful in ensuring land uses establish in appropriate locations within the City, retaining the primary land use patterns anticipated within each specific zone. There is no trend for activities to establish out-of-zone. For example, residential activities remain the primary activity in living zones; industrial activities
remain the primary activity in industrial zones. However, it is noted that retail distribution is one area in which the City Plan may be less successful\(^3\).

3. Protection of natural habitats, ecological and natural values – when the City’s natural habitats and natural values are identified in different sections of the City Plan, the quality and integrity of these values is retained, and in some instances, improved.

4. Operation of the Christchurch International Airport – the City Plan is successful at managing surrounding land uses in a manner that ensures the operation and development of the Christchurch International Airport continued in a safe manner and without curfew.

5. Rural Hills – the City Plan is successful at protecting the distinctive open landscape and rural characteristics of the Port Hills as a contract and backdrop to the urban area of the City.

Overall, at a strategic level the City Plan structure and approach can be considered to be effective.

1.1.2 Opportunities for City Plan Improvements

From the evaluation, a number of opportunities are identified which would improve the effectiveness and efficiency of the City Plan. This section summarises these opportunities under the headings of:

1. Improving effectiveness
2. Improving efficiency
3. Overall comment on improving effectiveness and efficiency.

1.1.2.1 Improving effectiveness

There are a number of effectiveness themes which occur in more than one effectiveness evaluation. Generally these are matters that warrant consideration as part of the review process, and within which there is opportunity to create improvements to the City Plan.

1.1.2.1.1 Rationalising zone by amalgamation

There are a wide range of zones which provide for the control of the effects of the use of land. The zones are largely achieving the outcomes sought. However, there is the opportunity to reduce the complexity of the City Plan by amalgamating zones seeking similar outcomes.

As currently structured, the zones are presented in sections organised by the dominant land use outcome sought – for example, living, business, rural, open space, cultural. Within each of these sections, there are individual zones providing a finer differentiation of the land use outcomes sought. There are typically common policies and many overlap in rules for each group of zones. The distinguishing rules often relate to the intensity of the permitted development (living), the range of land uses expected (business and rural), and the purpose for which the land is managed (open space and cultural).

\(^3\) Particularly before Variation 86 became operative
The distinguishing features between individual zones are blurred. The environmental outcomes sought and being achieved are similar. For example, in our City Plan evaluation and field collaboration we could not readily distinguish between the significant characteristics of the Rural 2 and 3 zones and a number of the suburban living zones. Therefore, there is an opportunity to amalgamate zones and simplify the City Plan. In particular, this opportunity exists to reduce the number of:

1. Living zones, particularly those relating to the suburban living environment⁴.
2. Rural zones, particularly those which have the common land use outcomes on the Canterbury plain⁵.
4. Open space and conservation zones for land managed by the Council within the urban parts of the City for public open space purposes⁷.

1.1.2.1.2 Furthering the control of intensity and built form of development in living areas

Controlling the intensity and built form of development is a central management technique in the City Plan used to achieve the character and amenity value outcomes sought. Within the living zones, the City Plan may not be resulting in the appropriate outcomes⁸.

The character and amenity values of the living areas are changing as a cumulative outcome of intensification. Depending on development pressure, this is occurring gradually in some locations and more quickly in others. With intensification, private space is increasingly dominated by buildings, structures and hard surfaces⁹, with green and other natural elements becoming less obvious. As a result, gradually hard surfaces are dominating visual character, particularly associated with the street scene and the general perception of neighbourhoods¹⁰.

This intensification may be creating tension with the overall anticipated character of the living areas¹¹. However, there is not sufficient clarity in the objectives of the City Plan to be clear that this is the case. This is one area of the City Plan that requires detailed consideration, with the result being a comprehensive set of provisions based around a clear articulation of the land use outcomes expected.

1.1.2.1.3 Increasing the role of urban design in managing land use change

Urban design has the potential to influence build form outcomes. Currently within the City Plan there is no clear, unified or city wide approach to urban design and the urban design outcomes sought.

Since the City Plan was prepared, urban design is one of the key developing planning approaches receiving increased emphasis, and could be better reflected in the City Plan. In effect, the City Plan is now dated in the way it controls urban design. Currently urban design provisions are being

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⁴ For Example, Living 1, Living HA etc
⁵ Rural 1, 2, 3, 4 and 5 (part)
⁶ Business 1 and 2, although Business 1 may be incorporated into a mixed use zone or an extension of the existing community footprint concept
⁷ For example, Open Space 1 and 2 and Conservation 2 and 4
⁸ Particularly if the ‘garden city’ provisions found in Volume 2, Section 4 (City Identity) of the City Plan are considered
⁹ Buildings, paved driveways and manoeuvring areas, fences.
¹⁰ This issue may become more pronounced if the intensification targets found in Proposed Change 1 are applied across the suburban living areas of the City as a whole.
¹¹ See or example Policies 4.2.1 Tree Cover, 4.2.2: Garden City, 6.1.2 Redevelopment and infill and 11.4.11 Street scene.
introduced into the City Plan on an incremental basis\(^\text{12}\). There is significant potential benefit in taking a more integrated and comprehensive approach, with the result being a clear, deliberative and integrated approach being applied to urban design in the City Plan. As part of this, if urban design is subject to greater emphasis, the City Plan should clearly state the land use outcomes anticipated from the application of urban design techniques.

1.1.2.1.4  Redefining the interrelationship between the function of different business locations

The City Plan includes a business distribution strategy based around the different functions of individual centres. This strategy culminates in the location of different business activities being control based on a centre city, district centre, local centre and industrial typology. During the evaluative period of 2000 to 2010, and possibly before, the differentiation between the functions of different business locations has been blurred. As a result, different areas are performing similar functions when this may not have been intended.

Two strategic issues are identified:

1. The function of the Central City within the City and how that may best be maintained and enhanced. This requires detailed consideration as part of the City Plan review.

2. Recognising Variation 86, whether the current business zoning of individual locations reflects the actual function of those locations, and if not, whether they should be rezoned accordingly. This is an area of the City Plan that improvements can be made.

The resolution of these issues is likely to result in either; a strengthening the City Plan in controlling the function of the different centres, or a move away from this function approach altogether.

1.1.2.1.5  Changing the purpose for which the rural areas are being managed

The rural area still largely retains its open space character, and to this extent the City Plan is effective. However, the primary management objective for a majority of the rural areas on the plains is the maintenance of potential for primary production. From the available data, together with the field collaboration, we doubt meaningful primary productive activities remain the dominate activity. Even when sites are of a size that is theoretically suitable for primary production, and hence the biophysical potential for this activity remains, the land use is often ‘life-style’ orientated. Whether this equates to a loss in potential is debateable, but if socio-economic factors are included in the consideration, the existing land uses are an indication that potential is diminished\(^\text{13}\). In a straight effectiveness evaluation, this means the City Plan is not successful in control land use to achieve this outcome.

From this evaluation, two approaches may be taken. The first is that the policies and methods of the City Plan need to be reviewed in order to better control land use to achieve primary production. While this option is available, it may not be achievable because of the financial drivers of primary production and the rural life-style property market. The second is to reconsider what the appropriate objective for these areas is, focussing instead on the open space and general rural characteristics, and possibly the potential for urbanisation. The City Plan should be reviewed to resolve this matter.

\(^{12}\) Through producing urban design guides, the Central City Urban Design Panel, Proposed Plan Change 53 in relation to the Living 3 and 4 Zones, Proposed Plan Change 7 in relation to Awatea Business 7 area, and the role of urban design staff in resource consent processes.

\(^{13}\) Proposed Plan Change 1 to the CRPS may further confuse this issue through the definition used within it for ‘rural’ which includes “Residential activity on lots of 4 ha or more”
1.1.2.1.6 Reducing the role of the transport controls in different locations

Transport is a fundamental to a successful City, and requires integrated management as land use changes. Currently the transport rules within the City Plan consistently create rule non-compliances requiring resource consent which are granted on a non-notified basis. This is particularly noticeable in locations where the scale of the land uses results in a moderate level of traffic generation. This brings into question the effectiveness and efficiency of the transport rule triggers.

A review of the transport rules provides an opportunity to reduce the resource consents required in environments with anticipated intensive traffic characteristics. This may result in a set of transport rule thresholds based on an amalgam of the expected characteristics of different locations and the transport characteristics of the land use, rather than a more generic City-wide approach which is currently used.

1.1.2.1.7 Determining how best to manage non-compliances within single developments

The City Plan is not effective in controlling the internal configuration of comprehensive multi-unit developments. These proposals typical involve the integrated development of a single existing property though the creation of a number of dwellings or units each on an individual site. In this situation it is not uncommon that rule non-compliances occur inside the proposal and are routinely granted on a non-notified basis.

To a large part, the granting of these applications is a result of the applicant also being the key affected party. Under Section 104(3)(a) of the RMA, a consent authority must not, when considering an application, have regard to – (ii) any effect on a person who has given written approval to the application. Therefore, typical plan administration practice is to largely disregard the effects of these non-compliances. As a result, we conclude that for the future occupiers of the development the effects on the environment are treated on a caveat emptor basis.

Resource consent processes associated with these non-compliances have little purpose, and therefore in this regard the City Plan is neither effective nor efficient. This does not mean that controlling the manner by which development is configured inside a single proposal has no merit, but that the current approach is not working. Therefore, there is the opportunity to improve the City Plan by either removing the need for resource consent in this instance, or enhancing the potential for the City Plan to control the long-term effects from the internal configuration of development. In order to enhance the potential, at a minimum consideration is required of; the use and meaning of ‘development standards’, and creating a clear expression of the long-term land use outcomes within the policies of the City Plan.

1.1.2.1.8 Removing the role of specialist zones when designations are used

The City Plan’s approach to managing activities such as schools which are subject to designation is effective, but complicated.

Within the City Plan, there are a number of instances where three layers of resource management instruments applying to a single site – a designation, a specialist zoning controlling similar activities as provided for by the designation, and a default zone controlling other activities. The primary example

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14 The non-compliances occur in relation to a number of transport rules, not just the high traffic generation rule.
15 Often transport non-compliance occur in combination with other non-compliance which also trigger the need for land use.
16 For example, recession plane, open space and separation requirements between different residential units within a single development.
17 ...set on the basis that non-compliance with any one or more of these standards may have significant effects on adjacent land.
is public primary and secondary schools. The Minister of Education typically holds a designation over these sites, and uses this designation to provide for their development. The zone applied to the site is the Cultural 3 Zone, being the 'schools' zone. Finally, in the event non-education activities being proposed, the zone provisions from the underlying zone apply, often being some form of living zone. This situation arose because of the City Council’s desire to avoid designations in the City Plan. This has not come to reality. Therefore, there is potential to simplify this regime by removing the specialist zone from designated site. As part of this process, it may be necessary to review and update the relevant City Plan objectives, policies and rules.

1.1.2.1.9 Upgrading zone boundaries

Incrementally land use in the vicinity of zone boundaries has changed in discrete locations, as is to be expected. Often this results in the land use taking on the character of the adjoining, not the subject, zone. Examples include the development of business land for residential purposes, open space land for residential purposes, and Business 4 land for retail purposes. Often these new land uses reflect the zones surrounding them, but not the zoning of the subject land. There is the potential to enhance the effectiveness and efficiency of the City Plan by reviewing the zone boundaries within the City Plan to ensure they are current and consistently applied.

1.1.2.2 Improving efficiency

There are a number of efficiency themes which occur in more than one efficiency evaluation of individual groups. Generally these are matters that warrant consideration as part of the review process, and within which there is opportunity to create improvements to the City Plan.

Overall, the efficiency of the City Plan has decreased over time for the simple reason that compliance costs have increased significantly faster than the rate of inflation. Therefore, if efficiency is to be increased, either compliance costs need to be reduced for each resource consent application, or application processes avoided. The latter is the focus of the discussion below.

1.1.2.2.1 Changing the risk tolerance basis upon which the City Plan is prepared

Establishing rule thresholds is a critical component of the City Plan as it determines when resource consent applications are required. These thresholds are subject to judgment, which in turn is influenced by perceptions of the risk posed if unintended land use outcomes occur. Overall, the effects based approach in the City Plan rules has resulted in a relatively risk adverse approach (i.e. tight rule thresholds).

At the heart of this issue are two competing risk management philosophies. The first is risk adverse, with resource consents being required so that the Council, and in some circumstances other parties, can consider the individual context and merits of a proposal. The second is risk tolerant, with the City Plan enabling changes to land use that typically, but may not always, be anticipated.

Assuming the identified increase in the Council imposed compliance costs are actual and reasonable, this brings sharply into focus whether the Council should adopt a more risk tolerant approach. Amending the rules in the City Plan to result in less consent applications will increase the City Plan’s overall efficiency. Those rules that routinely result in resource consent applications granted on a non-notified basis are an obvious area for exploration in any review process.

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18 The logic is that the resource management benefits of resource consent processes have not increased over time, but the compliance costs have, being an indicator of an increase in total costs. Consequently, the net benefit/cost has decreased, hence efficiency has reduced.

19 For example, maximum height, minimum number of car parks
1.1.2.2 Reducing the number of non-notified resource consent applications

The granting of non-notified resource consents indicates land use change that the City Plan anticipates. The rules in the City Plan result in a significant number of resource consent applications. The 2007/2008 Ministry for the Environment Survey of Local Authorities supports this conclusion. This reports that Christchurch City Council processed the second highest number of applications for its peer local authorities being the Group 4 Territorial Authorities (second to Auckland City), and processed the third highest of all local authorities. The number of consents the Council publicly notified was below the national average of between 4% and 5%, and is lower than the majority of the Group 4 Territorial Authorities. This is likely a result of the total number of consents rather than applications not being publicly notified when they should. Public notification is controlled by well established and understood legal principles in the RMA.

At the City Plan level, reducing the number of resource consent applications will increase the efficiency of the City Plan. However, this must be balanced against the effectiveness of the City Plan. The evaluations indicate that in a number of instances resource consent applications are routinely granted on a non-notified basis. This is an indicator that the consent process itself may be of limited value and could be bypassed by either taking a less risk adverse approach to controlling development, or by codifying standardised conditions of consent within the relevant rules.

1.1.2.3 Removing overlap of processes with other agencies

One of the measures of the efficiency of the City Plan rules is whether the issue considered is also considered through another process. The City Plan already deals with overlap in some processes by providing exemptions if an alternate process is followed. The fill and excavation rules are a primary example.

There are a number of other opportunities to reduce overlap between processes. For example, the Hazardous Substances and New Organism legislation and resulting regulation controls the import, manufacture or use (including disposal) of manufactured chemicals. In all instances this will not result in the appropriate control of hazardous substances in terms of the RMA. However, in many instances it may, thereby reducing the value a RMA consent process. Another example relates to overlap with Environment Canterbury regional policies and rules, with the protection of Christchurch Groundwater one instance of this.

1.1.2.3 Overall comment on improving effectiveness and efficiency

When all the effectiveness and efficiency themes are considered together, they lead to observations about the way the City Plan is drafted. While in theory this should not influence its effectiveness and efficiency, in practice it may. Therefore, in this section we identify key City Plan drafting choices that the City Council may choose to consider at the start of the City Plan review process.

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21 While the information from this Survey needs to be treated with caution as it lacks the context of the development pressure being faced by each local authority, it does support this finding.
22 Ibid pages 63 and 64.
23 Ibid compare pages 11 and 66.
1.1.2.3.1  Reducing the complexity of the City Plan

There is a significant opportunity to reduce the complexity of the City Plan, and hence its clarity and ease of implementation.

The City Plan spans three volumes and includes a variety of different provisions. These provisions include: descriptions, issues, general objectives, objectives and an explanation (generally) for each, policies and (generally) an explanation and reasons for each, environmental results anticipated for each objective and policy group, general statement of implementation methods, definitions, zone descriptions and purposes, zone and general rules, assessment matters, reason for rules, and planning maps. The result of this is a large document with similar information presented in different forms in different locations, albeit with the information fulfilling slightly different purposes.

Due to the overlap in information, there is a tendency towards the loss of sharpness, and hence detail, of expression. It is possible that this is a result of the need to differentiate between the roles of the different provisions. An observable trend is for detail to increase further through the document, to the detriment of the clarity and specificity of key provisions in the resource management hierarchy, its objectives and policies.

Since the City Plan was prepared, in 2005 Parliament recognised that the complexity of statutory plans as a matter of national concern. It amended section 75 of the RMA to provide the opportunity for plans to be expressed more simply and concisely by significantly reducing the mandatory content of those plans.

A further driver of complexity is the effects based approach adopted in the City Plan. This approach is typified by effects envelopes, instead of relying on the prescription of acceptable activities. This results in the need to control every effect of an activity, rather than using the activity itself as an indication of appropriateness. As a result it may be partly responsible for the significant number of resource consents being required in circumstances where the activity itself is anticipated at that location. However, moving away from the effects based approach in favour of a greater emphasis in controlling activity is a fundamental shift in the philosophy and expression of the City Plan.

Overall, there is the potential to significantly reduce the complexity of the City Plan by aligning its contents to that which is mandatory in Section 75. If this occurred, a greater focus should be placed on the expression of the objectives and policies. Ideally, these should clearly articulate the land use, as opposed to effects on the environment, outcomes anticipated. This will better provide a basis for consideration of resource consent applications, and aid effectiveness of the City Plan.

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24 Volume 1 Statement of Issues, Volume 2 Statement of Objectives, Policies and Methods, Volume 3 Statement of Rules
25 For example, Policy 11.1.2 is to maintain the general character of the suburban living environment. The explanation identifies open space and built form as the main determinates of character, and that these should not change dramatically, but infill can occur. How these competing considerations are to be weighed is not reconciled. Consequently there is no clear expression of the anticipated land use outcomes. In contrast, Policy 11.4.5 is to ensure that the outdoor component of non-residential activity is screened to protect privacy and outdoor of adjoining sites. From this policy it is clear what land use outcome is anticipated.
26 Section 104(1)(b)(vi) of the RMA
1.1.2.3.2 Confining the breadth and scope of the City Plan

The City Plan provides comprehensive coverage of all the resource management issues for Christchurch and how those issues are to be resolved. While this can occur, it results in provisions that cannot be fully effective because the City Plan is not the primary management document. For example:

1. The primary resource management agency in relation to water quality and quantity and air quality is Environment Canterbury.

2. The primary influence of the participation, engagement with, and flow of information to the community is the City Council’s work programmes and internal policies.

3. The primary influence of the provision and management of public reserves is the Reserves Act and City Council’s open space strategy.

4. The primarily influences of the provision and management of transport services and infrastructure is the City Council, Environment Canterbury and New Zealand Transport Agency.

An overriding pattern of the evaluations is that to be effective the City Plan must have meaningful influence. Statutorily, it only has influence over those matters it can control. With the change in Section 75(1) outlined in the section above, there is the opportunity for the City Council to reconsider the role of the City Plan, providing greater focus on its regulatory functions, excluding matters that it does not regulate.

1.1.2.3.3 Simplifying the Cascade Rule System

The City Plan uses a cascading rule system to determine; firstly whether resource consent is required, and secondly the activity status of any application. In simple terms there are development, community and critical standards, within non-compliance respectively resulting in restricted discretionary, discretionary and non-complying activity status. This reflects the different roles of the standards, with development standards relating to matters that affected the adjacent land, community standards relating to neighbourhood effects, and critical standards to effects on the wider area.27

Analysis of the resource consent data reveals three distinct patterns. Firstly, there are significantly fewer applications for breaches of the critical standards than the other standards. Secondly, non-complying activity status results in slightly more applications being publicly notified and refused, but largely these applications are processed non-notified and granted. Thirdly, there is no meaningful difference between applications for breaches of the development and community standards, with these typically being processed on a non-notified basis and granted.

Overall, the differentiation between development and community standards appears to have little meaning. This provides an opportunity to reconsider the three step cascade system and as a result simplifying the rule structure of the City Plan.

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27 See Volume 3, Introduction.
1.1.2.3.4 Role of City Plan Implementation in Achieving City Plan Outcomes

The manner in which the City Plan is administered and communicated by the Council to plan users plays a significant part in achieving effective implementation. The key aspect of plan administration that repeatedly arose through this evaluation is the nature and timing of communication between the plan user and the Council, and particularly the management of this communication.

The factors that influence effective communication between Council and plan users are:

1. Communication must be proactive – the sustainable management of the City’s resources is influenced by the form of land use change, which for significant change is often achieved through plan change and resource consent processes. Often by the time a private plan change or resource consent application is lodged with Council, the ability to meaningfully influence the form of development has significantly reduced as a result of the applicant’s financial and intellectual investment in the proposal. Consequently, early and proactive discussions between developers and Council should be undertaken to constructively facilitate optimal land use outcomes.

2. Cost is a barrier to communication - to meet with Council currently incurs additional project cost in terms of time and resources for a developer, which can create a disincentive for a developer to engage with the Council before applications are lodged. The developer experiences costs in a number of ways. Inability to organise timely meetings, on-going meetings, delays and postponements, or a requirement to go through Council own internal and non-statutory process result in significant holding costs for developers. Often developers are required to brief and prepare consultant(s) to attend meetings. This is at the developer’s expense. In addition, the time of Council’s staff is often charged to the developer.

3. Communication must be certain – effective communication is achieved where there is a clear expression of the expected outcomes in the City Plan. Clearly expressed outcomes provide certainty and focus on the matters that are required to be addressed. This avoids the potential for perception of bias, unwarranted focus on matters or concern of peripheral, the pursuit of secondary interests, or misunderstandings.

4. Communication must be backed by authority - engagement with the right people, having the right knowledge and expertise, as well as the authority to give clear and consistent advice is necessary. Discussions with persons not having the necessary knowledge, experience or authority may result in pointless or meaningless meetings which is a costly expense to the developer.

Recognising the benefits of the above, it must be acknowledged that early communication by the Council with plan users, particularly applicants, is not without risk. Pre-application communication has the potential to be viewed as pre-determining the relevant resource management process, and committing the Council to certain outcomes. It is important to manage this risk.

In summary, effective communication can positively influence the achievement of plan outcomes in front of the formal statutory processes and requirements. To be effective, communication should be early, preferably during the project investigation phase, particularly before a development proposal is lodged with Council for approval.

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28 Largely resource consent and private plan change applicants.
29 The Council recently instigated improved opportunities for private plan change applicants to communication with senior Council staff prior to the lodgement of applications.
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2 INTRODUCTION

2.1 Report Structure

This report fulfils the requirement in Stage Two of the Supply of Services Agreement for Monitoring the Effectiveness and Efficiency of District Plan Rules (Clause Section 35(2)(b) RMA). Within Stage One the study methodology was developed and adopted. In Stage Two the evaluation and assessment is undertaken in accordance with the methodology. The adopted methodology is summarised in Appendix One.

This report is organised into six chapters:

1. This introduction
2. Comment on the relevance of the report following the 4 September earthquake
3. Discussion of the monitoring information used and future monitoring recommendations
4. The evaluation of the effectiveness and efficiency of each of the detailed evaluative groups
5. The evaluation of the effectiveness and efficiency of each of the simple evaluative groups
6. An examination of efficiency at the City Plan level

Workbook 1: Field Collaboration supports this report. This workbook summarises the results from the selective field collaboration for each group. Set out in this workbook are pictures providing examples of the field observations.

2.2 Overview of Methodology

Section 35(2)(b) of the RMA focuses on how effective and efficient the policies and methods in the City Plan are in achieving (or otherwise) the natural and physical resource objectives set out in that Plan. This evaluation is to be completed at intervals of no more than 5 years (Section 35(2A)), and appropriate action is to be taken when this is shown to be necessary (Section 35(2)). Importantly, the section 35(2)(b) evaluation does not consider what are the appropriate objectives of the City Plan. Further, in light of the effectiveness and efficiency assessment, an overall judgement is not required to be reached as to the appropriateness of the policies and methods. This is a matter of judgement to be made by the City Council in the context of Section 32 of the RMA at the time of Plan review or change.

In part, the evaluation of effectiveness is a measure of the degree of influence of the City Plan. That is, the achievement or otherwise of the objectives must be because of its policies and methods, not the result of other influences such as the economic conditions and societal preferences. Therefore, the evaluation must focus on those things that the City Plan is empowered to control, which relates to subdivision, changes in land use, noise, and activities on the surface of water, all excluding activities within the coastal marine area.

30 Methodology for monitoring the effectiveness and efficiency of the Christchurch City Plan (Section 35(2)(b) of the RMA) dated 13 April 2010 and adopted by the Christchurch City Council on 20 April 2010.

31 Coastal marine area means the foreshore, seabed, and coastal water, and the air space above the water—

(a) Of which the seaward boundary is the outer limits of the territorial sea:

(b) Of which the landward boundary is the line of mean high water springs, except that where that line crosses a river, the landward boundary at that point shall be whichever is the lesser of—
The primary purpose of the evaluation is twofold:

1. To fulfil the requirements of Section 35(2)(b) and (2A) of the RMA to monitor the effectiveness and efficiency of the City Plan at intervals of no more than 5 years.

2. To shape the future review of the City Plan.

In addition, the evaluation will provide a base-line for future City Plan monitoring and be used to inform the future development of the City Plan monitoring programme.

For the purpose of this evaluation 'effectiveness' is defined as:

**Effectiveness** - means how successful a provision is in achieving the stated objective. How successful a provision is can be measured in terms of not just whether an objective will be achieved outright; but it may alternatively relate to the extent to which progress will be made even if the objective won't be met in full. The speed at which progress is made may also be a relevant consideration.\(^{32}\)

Efficiency is defined as:

**Efficiency** - means where the benefits will outweigh the costs, either immediately or over time. The most efficient policy or method will achieve the stated objective with the greatest benefit and at the least cost (costs and benefits may be quantitative, semi-quantitative and/or qualitative). Efficiency is not to be confused with the terms 'net benefit' or 'net present value' (a measure that implies that all benefits and costs can be converted to a common 'currency' and netted off against one another to generate a single measure).\(^{33}\)

At the outset the evaluation undertaken is limited by the requirements that:

1. Only existing sources of information may be used.

2. All the chapters in Volume Two and Three of the City Plan are to be considered.

3. Field corroboration of any findings through the use of pictures is to be undertaken.

This project is approached in two steps. The first is to develop and agree a detailed methodology for the evaluation to follow. Following a scan of practice within New Zealand, detailed consideration of the legislative requirements, and the needs of the city council, a detailed methodology was agreed in April 2010. The agreed methodology is summarised in Figure 1 and included in detail in Appendix 1.
Evaluating the effectiveness and efficiency of the Christchurch City Plan

Break the City Plan provisions into groups largely based on the commonality in City Plan outcomes sought and their spatial application.

Categorise the groups according to the benefits that can be obtained from the monitoring for the review of the City Plan.

Detailed monitoring those groups for which detailed monitoring is required to inform the review of the City Plan.

Simple monitoring those groups for which the review of the City Plan can be informed by relatively simple and focussed monitoring.

Narrative monitoring groups for which it is unlikely the evaluation will produce any further or new information that will affect the current understanding of the City Plan, largely because of work already undertaken.

Multi focussed based on the City Plan’s Objectives, Key AERS and the focus of the provisions.

Determine what is to be monitored (i.e. Refined AERs and Monitoring priorities (indicators)).

Single focussed based on primary purpose of provisions.

Information collection

Effectiveness assessment

If reasonable level of effectiveness

Efficiency assessment

If low effectiveness

No efficiency assessment

Figure 1: Project Methodology Summary
As shown in Figure 1, in order to make the evaluation manageable, the City Plan is divided into three evaluative categories: detailed, simple and narrative. Each category is then further divided into a number of groups of provisions that have matters which are largely in common. Within the detailed evaluative category are those groups of provisions for which a thorough understanding of their effectiveness and efficiency will potentially provide significant benefits to the City Plan review. For these groups a comprehensive evaluation is undertaken. The simple evaluative category contains groups of provisions where the effectiveness and efficiency can be understood from a more shortened evaluation. Within the narrative category are those provisions which decisions have already been made to review them, or the evaluation is unlikely to result in additional meaningful information for the upcoming City Plan review. For these groups, no evaluation is undertaken

The City Plan groups used are as set out in Table 1.

<table>
<thead>
<tr>
<th>Detailed</th>
<th>Simple</th>
<th>Narrative</th>
</tr>
</thead>
<tbody>
<tr>
<td>Christchurch Airport</td>
<td>Deferred Living</td>
<td>Air and Water</td>
</tr>
<tr>
<td>Urban Growth</td>
<td>Ecological Protection</td>
<td>Central City Commercial</td>
</tr>
<tr>
<td>Coast</td>
<td>Fill/Excavation Grouping</td>
<td>Central City Living</td>
</tr>
<tr>
<td>Education and Hospital Facilities</td>
<td>Land Contamination</td>
<td>Energy</td>
</tr>
<tr>
<td>Industrial</td>
<td>Other Facilities</td>
<td>Greenfield Living</td>
</tr>
<tr>
<td>Open Space Recreation</td>
<td>Tangata Whenua and Cultural</td>
<td>Heritage Protection</td>
</tr>
<tr>
<td>Suburban Commercial</td>
<td>Travellers Accommodation</td>
<td>Designations</td>
</tr>
<tr>
<td>Suburban Living</td>
<td>Utilities</td>
<td>Financial contributions</td>
</tr>
<tr>
<td>Rural Hills</td>
<td>Waste</td>
<td>Hazardous substances</td>
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<td>Rural Plains</td>
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<td>Natural Hazards</td>
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<td>Transport</td>
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<td>Retirement Village</td>
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<td>Rural Quarry</td>
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<td></td>
<td></td>
<td>Special Amenity Areas</td>
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<td></td>
<td></td>
<td>Wigram Airport</td>
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</tbody>
</table>

Table 1: Evaluation Approach for Different City Plan Matters

This evaluation undertaken largely focuses on the implementation of the City Plan control of land use and subdivision. This control is a direct result of the City Plan rules, which have the force of a regulation made under the RMA.

The effect of the City Plan rules are to permit an activity, require resource consent before an activity can occur, or prohibit an activity.

For this category the City Council has largely already considered effectiveness and efficiency as part of other processes and formed conclusions as to what the appropriate City Plan response is. In a number of circumstances this response is to review the relevant parts of the City Plan or introduce changes in the way parts of the City Plan are implemented.

As an example of site specific provisions.

Section 76(2) of the RMA.

If an activity is described in this Act, regulations (including any national environmental standard), a plan, or a proposed plan as a permitted activity, a resource consent is not required for the activity if it complies with the requirements, conditions, and permissions, if any, specified in the Act, regulations, plan, or proposed plan (Section 87A(1) of the RMA).

In this Act, the term resource consent means any of the following:

(a) A consent to do something that otherwise would contravene section 9 or section 13 (in this Act called a land use consent):
(b) A consent to do something that otherwise would contravene section 11 (in this Act called a subdivision consent):
(c) ... (Section 87 of the RMA)

If an activity is described in this Act, regulations (including a national environmental standard), a plan, or a proposed plan as a prohibited activity,—

(a) no application for a resource consent may be made for the activity; and
(b) the consent authority must not grant a consent for it (Section 87A(6) of the RMA)
consent is processed and the statutory tests to be applied when determining the outcome of the application. These activity classes are: controlled activity, for which generally consent cannot be refused; restricted discretionary activity, for which the relevant considerations are limited by what is specified in the City Plan but the application may be either granted or refused; discretionary activity which the application may be either granted or refused; and non-complying activity, which the application may be either granted or refused, but before granting one of two specific statutory tests must be met.

The City Plan rules are set out in the form of development, community and critical standards. As stated in the Introduction to Volume 3 of the City Plan:

1. Development standards have been set on the basis that non-compliance with any one or more of these standards may have significant effects on adjacent land.

2. Community Standards have been set on the general basis that non compliance with any one or more of them may have moderate adverse effects of a "neighbourhood scale" or significant impact on adjacent land, whether such effects are specific to that proposal, or cumulative in nature.

3. Critical Standards have been set on the basis that non compliance with any one or more of them, may have significant actual or potential adverse effects over a wider area, whether such effects are either specific to that proposal, or cumulative in nature.

As defined in the Introduction to Volume 3, an activity is:

1. Permitted activity if it complies with all critical standards, community standards and development standards in zone or city rules, or which are not specified as discretionary or controlled activities.

2. Controlled activity if it complies with any specified critical standards, and community standards, but which do not meet particular development standards or are specifically identified as controlled activities.

3. Restricted discretionary activity or Discretionary Activity if it complies with all of the critical standards but do not comply with any one or more of the community standards or development standards specified in the Plan; or which are specified as discretionary activities.

4. Non complying Activity if it does not comply with any one or more of the critical standards specified in the Plan, or are specifically identified.

5. Prohibited Activity if it within a critical standard has been specified as a prohibited activity within the Plan.

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40 See Section 87A of the RMA
41 See Section 104A of the RMA
42 See Section 104C of the RMA
43 See Section 104B of the RMA
44 See Sections 104B and 104D of the RMA
2.3 Study Limitations

The evaluation undertaken is subject to a number of limitations. While these do not result in 'gross' errors, in some instances they reduce the confidence in the conclusions reached.

Broadly, the key limitations to the evaluation undertaken are:

1. The brief is to examine the effectiveness and efficiency of the City Plan policy and methods. Therefore, the evaluation point is against the existing objectives. If these objectives are no longer appropriate, the worth of the evaluation is devalued. Determining the appropriateness of the objectives is a matter for another City Plan process. However, where the relevance of an objective is identified as changing, this is described.

2. The evaluation is limited to the use of existing information. This restricts the evaluation in areas of the City Plan that do not coincide with existing data collection activities.

3. The information entered into, and therefore extracted from, the various data-bases of variable coverage and quality. Recognising this, where possible a number of different information sources are used to confirm the conclusions reached. The information bases are described in detail in Appendix Two.

4. The lack of engagement with plan users. To overcome this we have applied our direct and indirect experience of using the Plan, but expect that engaging with other plan users will highlight other nuances. This can occur as part of the City Plan review process.
3 EARTHQUAKE ON 4 SEPTEMBER 2010

3.1 Summary

Since the commissioning of this evaluation the 4 September earthquake and series of aftershocks occurred. This event falls outside the evaluation period, and therefore the information available and presented in this report does not reflect the event.

We consider that the effectiveness and efficiency evaluation of the City Plan remains relevant following the 4 September earthquake.

We are of the view that in response to the 4 September earthquake:

1. If a streamlined City Plan process is empowered by regulation, work should be accelerated to strengthen the City Plan’s urban design provisions in the Central City and other business areas affected by the earthquake.

2. The appropriateness of the business zoning in locations where there is limited prospect of redevelopment for solely business purposes should be considered.

3. As part of the City Plan review:
   a. Once the appropriate balance of engineering and land use responses becomes more certain, the natural hazard provisions should be reconsidered to ensure they effectively control land development in response to the lessons learnt.
   b. Once the outcome for individual historic heritage buildings is known, the historic heritage provisions, including listings, should be reviewed and updated.

3.2 Introduction

Since the commissioning of this evaluation, the 4 September earthquake and series of aftershocks have occurred. This event resulted in significant damage to structures, services and roads and land within the City.\(^\text{45}\). The 4 September earthquake falls outside the evaluation period for this study, and therefore the information available and presented in this report does not reflect it. However, the earthquake will influence the future effectiveness and efficiency of the City Plan.

In this chapter, we consider the influence of the 4 September earthquake on the findings and conclusions reached in this report.

\(^\text{45}\) And the neighbouring districts
3.3 Canterbury Earthquake Response and Recovery Act 2010

In response to the 4 September earthquake the Government has enacted the Canterbury Earthquake Response and Recovery Act 2010. The purpose of this legislation is:

The purpose of this Act is to—
(a) facilitate the response to the Canterbury earthquake:
(b) provide adequate statutory power to assist with the response to the Canterbury earthquake:
(c) enable the relaxation or suspension of provisions in enactments that—
   (i) may divert resources away from the effort to—
      (A) efficiently respond to the damage caused by the Canterbury earthquake:
      (B) minimise further damage:
   (ii) may not be reasonably capable of being complied with, or complied with fully, owing to the circumstances resulting from the Canterbury earthquake:
(d) facilitate the gathering of information about any structure or any infrastructure affected by the Canterbury earthquake that is relevant to understanding how to minimise the damage caused by future earthquakes:
(e) provide protection from liability for certain acts or omissions.

Section 6 of this Act enable an Order-in-Council to be made, within constraints, to grant an exemption from, or modify, or extend any provision of, amongst other acts, the Resource Management Act 1991. On 16 September 2010 the Canterbury Earthquake (Resource Management Act) Order 2010 was made. This order states it provides for the extension of certain time periods prescribed by or under the Resource Management Act 1991 (the Act); it suspends any obligation for discounts to be paid under regulations made under section 360(1)(hj) of the Act; it relaxes certain administrative and other duties; and it modifies certain statutory requirements to better apply those requirements to the particular circumstances arising from the Canterbury Earthquake. The order also provides immunity from prosecution for the local authorities for omissions that permit a contravention of the Act, where that omission is reasonably necessary for the purpose of the Canterbury Earthquake Response and Recovery Act 2010.

This Order-in-Council does not materially affect the outcomes sought by the City Plan, but may impact on historic heritage values when a building is deemed as requiring measures to avoid immediate danger or to fix insanitary conditions under section 129 of the Building Act 2004.

3.4 City Plan Going Forward

The City Plan controls of any actual or potential effects of the use, development, or protection of land, including for the purpose of the avoidance or mitigation of natural hazard. This includes the effects relating to seismic activity and liquefaction. How effectively and efficiently it achieved this in relation to the 4 September earthquake is not a question that this evaluation can answer.

It is reasonable to expect that the redevelopment process resulting from the 4 September earthquake will run in front of the ability of the City Council to change the City Plan. Therefore, in reality the built form and urban design responses will largely be influenced by the existing City Plan, the earthquake recovery process and wider market drivers.

Looking forward, it is anticipated that a mix of land use control and engineering responses will be required in response to the 4 September earthquake. What the appropriate mix will be, and how these are to be implemented, again is not a matter that can be determined as part of this project. However, to the extent a land use response is required, without other empowerment or the City

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46 See Volume 2, Part 2, Objective 2.5
47 Unless additional central government empowered is forthcoming
Council controlling land through ownership, it is likely that the City Plan will form a part of this. If it does, probably specific plan changes will be needed.

Specific land use issues are likely to arise from 4 September earthquake at locations within the City where existing structures have been significantly damaged. These will relate to the repair or replacement of these buildings, the land they sit upon, and the surrounding infrastructure. As a result, attention will focus on the appropriateness of the:

1. Urban design outcomes sought in the City Plan, particularly in the Central City and other business zones. It is reasonable to expect that there will be tension between the land owner, Council and other stakeholders as to the appropriate site and building design. This will result in focus on the land use controls in the City Plan. This is likely to reinforce the need to accelerate work on controlling urban design through the City Plan.

2. Land use outcomes anticipated within each zone. It is possible that due to economic or safety drivers, in some locations the existing business zoning is no longer appropriate, with alternative (probably residential) land use being more desirable for expedient or strategic reasons. This may particularly be the case in locations where the demand for commercial activities is low.

Overlaying this, will be debate about the historic heritage. The 4 September earthquake significantly damaged a disproportionate number of structures on the ‘list of protected buildings, places and objects’. The response to this is a matter that the City Council is currently working through. To remain current, at the time of review the historic heritage provisions will require updating and amending.

As part of redevelopment, it is likely that attention will also focus on the land development process, including site conditions, earthworks, and servicing. Largely, these matters are dealt with as part of the subdivision consent process, or through a mix of building consent and land use consent processes\(^\text{48}\). We are not clear whether there is a further role for the City Plan in this matter.

\(^{48}\) Where land use consent is required
4 MONITORING INFORMATION AND RECOMMENDATIONS

4.1 Summary

Evaluating the effectiveness and efficiency of the City Plan is largely dependent on the availability and quality of information to provide an understanding of whether the objectives of the City Plan are being achieved and what the influence of the City Plan is.

The way land use is changing can be coarsely understood from the City Council’s resource consent and building consent data-bases. The usefulness of both data-bases is limited by: the level of detail in which changes of land use are recorded, particularly in the lack of differentiation between different land uses in the standardised entry codes; and the quality of the entries.

Understanding the natural and physical resource outcomes of a number of City Plan objectives is difficult because they relate to people and the community’s perceptions. Examples of this include the objectives which relate to character and amenity values. This can only be achieved through perception surveys. Currently there is no comprehensive programme of such surveys that will deliver information to the level of detail required for this evaluation.

In a number of locations the City Plan seeks to facilitate land use change. This includes residential intensification in areas such as the Living 2 Zone. Whether this change occurs is in part a reflection of the wider social, economic, historical and legislative environment. If land use change is not occurring, understanding why is important. There is no comprehensive programme in place to achieve this.

Another form of information available about the effectiveness and efficiency of the City Plan is the direct experience of its implementation. Interviewing representatives of applicants and other plan users would provide additional insight, particularly in relation to: wider compliance costs; choices made in applications; and less than optimum outcomes being created to avoid or limit resource consent applications.

Over time many parts of the City Plan have been subject to court scrutiny. Plan administration capture this through the development of internal practice notes. These are not widely available outside plan administration. Making this information available on a wider basis would be of benefit.

Understanding changes in costs\(^49\), particularly administration\(^50\) and compliance\(^51\) costs in relation to the City Plan is important to determining how efficiency may have changed over time. Currently, the only useable information available is those costs imposed on applicants (both resource consent and plan change) by the City Council.

Redundancy of process is an indication of the level of efficiency of City Plan provisions. Repeating resource consent conditions are an indicator of one form of redundancy. Currently there is no centralised system of recording these to enable an evaluation to be undertaken.

It is recommended that:

1. For the resource consent and building consent data-bases, more detail is provided through the entry of individual applications; and spot quality control checks are implemented.

\(^{49}\) Assuming that the benefits are largely determined by effectiveness

\(^{50}\) Christchurch City Council unrecovered costs

\(^{51}\) The costs to the applicants and other parties
2. Further, in terms of the resource consent data-base:
   a. Subdivision consent applications are coded with the same rigor as land use consent applications.
   b. The outcome of the applications be recorded in greater detail, including any consent conditions.

3. In order to understand in detail land use change, and particularly that permitted by the City Plan, it is recommended regular and repeatable survey/inventory approaches are used in locations most sensitive to change. One such location is the suburban living environment.

4. Where community perception objectives (e.g. amenity values and character) are central to the land use outcomes sought, a regular perception survey regime is recommended.

5. Programmes are developed to understand why land use is or is not changing in locations of the city where significant land use change is desired. One example may be the Living 2 Zone.

6. Processes are developed to systematically engage with representatives of applicants and other plan users about Plan effectiveness and efficiency.

7. The City Plan practice notes are either made more widely available or a reference system be developed to alert plan users to the information in those practice notes.

8. Financial systems are developed to enable all plan administration (consent and plan change) costs, and a fuller understanding of all compliance costs, to be collected and compared.

### 4.2 Introduction

Evaluating the effectiveness and efficiency of the City Plan is largely dependent on the availability and quality of information. This information needs to provide a clear understanding of the changes to the City in the time period being considered resulting from the use, development and protection of land, how these changes relate to the outcomes established by the City Plan objectives, and ultimately its influence.

Achieving this requires a comprehensive and integrated monitoring strategy. Ideally, this draws upon all the monitoring activities of the Council, ensuring information is collected in sufficient detail and in a way that can inform the City Plan evaluation. In practice this is not occurring in New Zealand for first generation resource management plans, and is not the case for the City Plan.

The availability and quality of information influences the confidence with which conclusions are drawn. Figure 2 draws together the key monitoring and information requirements for the effectiveness and efficiency evaluation of the City Plan. The solid lines and boxes represent those information flows which are largely achieved as part of this project, with the weight of the line representing the level of confidence in the information available. The dashed lines and boxes represent information areas and connections that have not been able to be made as part of this project.
Figure 2: Overview of Monitoring Information and Flows

In this chapter the lessons learnt about the available information are recorded, and recommendations made in relation to monitoring changes which could better support the future evaluation of the effectiveness and efficiency of the City Plan.

4.3 Information sources

In this section, using Figure 2 comment is made on the information sources used in this evaluation and the limitations associated with them. Opportunities to improve the relevance of these data-bases are identified in the form of recommendations. These information sources are described in detail in Appendix Two.

4.3.1 State of the Environment

The City Council has an established State of the Environment monitoring programme, which in part is designed to inform the effectiveness and efficiency of the City Plan. This monitoring programme draws on information collected by the City Council and other agencies, such as Statistics New Zealand.

The information available from this programme is largely an examination of the physical and social changes within the City at the city-wide scale. At this scale, the information relating to the physical changes within the City is largely only useful to examine land use changes relating to Urban Growth. This information includes the vacant industrial and residential land analysis. However, it is of limited value when looking at land use changes in different geographical areas of the City.

4.3.2 Land Use Change

Understanding land use change is one of the key to evaluating the effectiveness and efficiency of the City Plan. The primary function of the City Plan is to control the adverse effects of the use, development and protection of land.

At a coarse level, gross land use change can be understood by changes in zoning and tracking development of that land. The City Council has established methods to achieve this.
Within the existing urban and rural areas of the City land use change is harder to understand. The information available is from:

1. The building consent data-base. This records individual building consents and project information memorandums for all structures where the necessary applications are made. The usefulness of this data-base is limited by the coarseness of the coding and descriptions. The current data entry system does not easily allow:
   a. For residential land uses: dwellings and multiple unit developments to be differentiated between; whether a dwelling/unit is a replacement or addition; and the different forms of building modifications to be understood.
   b. For land uses other than residential: the identification of different types of land use consented by code.

2. The City Council rating data-base. This largely records the existing land use as part of the highest and best use entry coding system. The accuracy of this information relies upon the actual land use conforming to the nominated use and the entries being current. Field collaboration indicates that this data-base provides a useful approximation of actual land use within the urban area of the City.

3. Resource consent data-base. This records individual resource consent applications and other types of applications. For each there are fields which relate the application description, the process, the outcome, and City Plan non-compliances. From this data-base land use change requiring resource consent, or achieved by other processes, can be identified at an individual site level. It is difficult to obtain aggregate data. Often a combination of the description and non-compliance code is necessary to identify the land use change of interest. Further, within this data-base, particularly in relation to entries early in the monitoring period and for subdivisions, a number of the data fields are not completed, resulting in the need to rely on the descriptions, which entered in a 'free entry' field and are subject to considerable variability. This is particularly evident when the data-sets used are relatively small.

None of these data-bases allow the identified of fine grained land use change occurring within the City which does not relate to structures and in City Plan terms is either permitted or the change is undertaken without the necessary consents\(^{52}\). Traditionally, this information is collected through inventory and survey methods. However, the reality of collecting this information is it is an intensive, and hence expensive, exercise, with it often being difficult to show temporal trends over the relatively small time-frames of five years. Notwithstanding this, for those areas sensitive to particular land use changes, it is potentially an important source of information\(^ {53}\). Currently, the Council tends to collect this information on a project basis, in response to fulfilling a project need. Consideration should be given to establishing a land use inventory approach, at least to the level of sampling land use change, for the living areas of the City.

### 4.3.3 City Plan Outcomes

The effectiveness and efficiency evaluation considers how well the policies and methods (including rules) of the City Plan are achieving its objectives. Classically, it is the anticipated environmental results that define the outcomes being sought. However, commonly the anticipated environmental result and monitoring provisions expressed in the City Plan relate to the wider ‘state of the environment’, rather than the anticipated land use. Further, the objectives are often couched in inspirational and generalised language. Together, these make it difficult to understand what the desired land use outcome is. Consequently, a ‘whole of plan’ approach needs to be taken to

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\(^{52}\) For example, changes in landscaping, hard surface areas, fencing, level of building maintenance.

\(^{53}\) For example, changes that affect the character of the suburban living area.
understand the physical expression of the outcome sought. This blurs the distinction between the outcomes and the courses of action\(^\text{54}\) that are meant to achieve those outcomes. This risks an analysis focussing on undertaking the courses of action, rather than the outcomes resulting from those courses of action. For matters that involve elements of judgement like character and amenity values, it is a significant limitation to understanding effectiveness and efficiency. Therefore, in a number of instances the objectives of the City Plan could be expressed in clearer language that details the physical outcome expected. This is particularly the case where the objectives deal with perceptual matters such as character and amenity values.

### 4.3.4 Influencers of Change

The influencers of change is an important component to understanding the role of the City Plan, and hence its effectiveness. This is particularly in circumstances where the City Plan is promoting active change to the use of land use, as opposed to controlling the adverse effects of that change. The influencers of change can be categorised into three groups for the purpose of discussion: City Plan rules, City Plan ‘non-regulatory methods’ and ‘wider drivers’.

#### 4.3.4.1 City Plan rules

City Plan rules permit, prohibit, or require resource consent be obtained for changes in the use of land, including subdivision. The only systematic data-base recording the application of these rules is the resource consent data-base\(^\text{55}\). This data-base records land use change subject to an RMA application, whether that be resource consents, certificates of compliance (permitted activities), change in consent conditions, outline plans (designations) and the like.

The fundamental weaknesses of this data-base are that it does not:

1. Record the detail of the outcomes of these applications. While there is an outcome recorded it is in the form of ‘granted’ and ‘declined’. For the purpose of this evaluation, this does not enable an understanding of the extent of grant and subject to what conditions. The lack of a system of recording and categorising of conditions limits the understanding of the effectiveness, particularly if conditions become routine and predictable. Further, it also means there is no data-base link between these conditions and the City Council’s enforcement activities.

2. Differentiate subdivision consent applications\(^\text{56}\), and apply the same rigor and methodology to coding non-compliances for subdivision consents.

Another form of information available about the City Plan rules comes from the direct experience of their administration. As part of this project the plan administration staff were interviewed with valuable insights obtained. Extending this to representatives of applicants and other plan users would have provided additional insight, particularly in relation to wider compliance costs, choices made in applications, and less than optimum outcomes being created to avoid or limit resource consent applications.

Over time many parts of the City Plan have been subject to court scrutiny, with either comment or rulings made in relation to the meaning and veracity of individual, or groups of, provisions. Currently, this is recorded through plan administration practices notes. It is understood that this is a relatively recent development. Access to the practice notes is not widely available. Building on these practice notes to provide a wider range of plan users with easy reference to previous court decisions would be

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\(^{54}\) Policies and methods.

\(^{55}\) It is clear that the coding of non-compliances has improved over time, but still remains ‘patchy’.

\(^{56}\) Except in the description field.
of considerable benefit. This does not necessary mean making the practice notes available, but simply involve developing a referencing system to court decisions.

Finally, one fundamental weakness of this evaluation is the lack of monitoring permitted activities, including compliance with the standards in the City Plan. The resource consent data-base allows insight into those permitted activity conditions that may be too strict. However there is no system, apart from field observations, to understand those permitted activity conditions which are resulting in unintended outcomes.

4.3.4.2 City Plan ‘other methods’

The City Plan relies on more than rules to achieve the objectives. These are typically referred to as other methods. At present there is no systematic recording of the development and implementation of these other methods, and the degree of influence of the City Plan. These, with the exception of the Development Contribution Policy, are largely driven by other City Council programmes and legislation. It is not clear what the influence of the City Plan is on these.

4.3.4.3 Wider drivers

Land use is also a response to drivers other than the City Plan. It is a reflection of the wider social, economic, historical and legislative environment. The City Plan can control change, but it cannot instigate change unless this wider environment is supportive. Therefore, where the City Plan seeks land use change, understanding these wider drivers is important. Currently, this is largely achieved on a project and individual staff basis. There is no systematic way of tracking the wider drivers in those locations of the City where land use change is desired, particularly relating to the redevelopment in the existing built up area.

4.3.5 Community Perceptions of Change

Many of the objectives of the City Plan relate to people and the community’s perception of the natural and physical environment, particularly in relation to character and amenity values. Therefore, it is important to understand the views of people and the community to changes to natural and physical resources. This information can be collected using a range of social science techniques, with the most common being through randomised surveys and focus groups.

Currently, the City Council undertakes survey work at two levels. The first is City-wide and generalised, typically as part of the Council’s Bi-annual Residents’ Survey. This is largely pitched at Council service delivery. It results in information that is too general to be meaningful at this level of analysis. The second is on a project basis. This is typically driven in response to a Council work programme arising from a perceived issue57.

For City Plan effectiveness, community survey targeted directly at understanding the views of the community in relation to the key perception based objectives would be of considerable value. An example of this is suburban character within the Living 1 zone.

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57 Examples include: Christchurch City Council’s 2001 Townhouse Survey Report; Lincoln University 2004 The effects on Infill Housing on Neighbours in Christchurch prepared for Christchurch City Council; and Christchurch City Council’s 2004 New Subdivision Residents Survey.
4.3.6 Costs

Understanding changes in costs in relation to the City Plan is important to determining how efficiency may have changed over time. Costs associated with the efficiency of the City Plan are incurred by the:

1. City Council and include its:
   a. Administration costs
   b. City Plan development, monitoring and review costs
   c. Compliance and enforcements costs.
2. Applicants’ compliance costs, typically associated with resource consent and plan change applications.
3. Other parties participating in resource consent and other resource management processes.

There is little in the way of consistent and comprehensive information collected about these costs. The readily available information relates to cost of the City Council processing resource consents and private plan changes. The resource consent costs can be used as an indicator of compliance costs. However, given the nature of the City Council’s financial systems, caution must be exercised in drawing conclusions as to the total change in costs. This is because of changes in funding and internal charging policies within the City Council.

4.3.7 Redundancy of Process

Redundancy of process is an indication of the level of efficiency of City Plan provisions. Where resource consent processes can be avoided while achieving the same or similar natural and physical resource outcomes, the efficiency of the City Plan requiring a resource consent process is diminished.

There are two types of processes that may be unnecessary:

1. Processes that the outcome is largely predictable, and therefore may be avoided through permitted activity rule plan drafting.
2. Processes that duplicate other processes or result in similar considerations, and therefore may be avoided because the outcome will be achieved in any event. This is largely because the matter is the subject of separate control through other legislation, other agencies or by other City Council controls.

As part of this process, the predictability of the consent process could not be considered, except by noting how the applications were processed and whether they were granted or not. This is because there is no data-base of conditions of consent. This evaluation in this report may overstate the redundancy of process in this regard.

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58 Assuming that the benefits largely are determined by effectiveness.
59 Christchurch City Council costs which are not recovered from the applicant or other parties.
60 Costs of resource consent (or other) processes such as: the preparation, lodgement and determination of applications. These costs include the cost of time (holding costs).
61 For example, Hazardous Substances and New Organism Act and the associated regulations.
62 For example, Environment Canterbury.
63 For example, bylaws.
5 EVALUATION OF THE DETAILED GROUPS

5.1 Introduction

The detailed evaluation groups are those groups of City Plan provisions which are of strategic importance to the overall outcomes sought by the City Plan and where the City Plan is the primary tool to achieve those outcomes. Typically, these groups affect large geographic parts of the City. Determining effectiveness and efficiency requires a multifaceted evaluation.

The detailed evaluative groups relate to:

1. Christchurch Airport
2. Urban Growth
3. Coast
4. Education and Hospital Facilities
5. Industrial
6. Open Space Recreation
7. Rural Hills
8. Rural Plains
9. Suburban Living
10. Suburban Commercial.

Within this chapter, in the sections that follows under the heading of each group:

1. A summary of the main conclusions reached is set out.
2. The group is introduced, including a description, geographical extent, context, and a summary of the City Plan outcomes.
3. Where appropriate, information is set out providing a context for the evaluation that follows.
4. Effectiveness is evaluated, using the summarised City Plan outcomes. Tables, figures and pictures are used to illustrate the evaluation. Further pictures are available in Workbook 1.
5. Efficiency of the group is evaluated, largely by consideration of the resource consent process and outcome data.
6. An addendum is provided summarising the detail of the key City Plan provisions detail.

As an example of site specific provisions.
5.2 Urban Growth

5.2.1 Summary

The Urban Growth group relates to those parts of the City Plan that control urban growth. The primary focus of the City Plan is to create a sustainable urban form through urban consolidation, and close proximity and good accessibility between living, business and other employment areas. It is anticipated this will result in a number of desired transport outcomes.

The City Plan is effective in accommodating urban growth with a primary emphasis on consolidation. Residential development is resulting in increased density of development within the total urban area of the City.

The City Plan is less effective in maintaining the City Centre’s role as the principle focus for commercial and administration businesses, and overall employment. Its role for these activities is diminishing. What cannot be determined is whether this results in it no longer being the ‘principal focus’ for these activities, and what influence changes to land use outside the City Centre is having.

The City Plan is of unknown efficiency in controlling the growth of the City. The last major land release was through the City Plan submission and hearing process in the late 1990s and early 2000s. The evidence is the residential land bank is reducing. However, we note significant public and private plan changes are in process.

Proposed Change 1 to the Canterbury Regional Policy Statement is likely to establish appropriate locations for residential and business growth with the Greater Christchurch area, including Christchurch City. This will influence the review of the City Plan, particularly as the City Plan is required to give effect to Change 1 once it is operative.

It is recommended that the role of the Centre City and the influence of the City Plan in controlling land uses within, and which impact on, the Centre City is reconsidered as part of the review.

5.2.2 Introduction

The Urban Growth Group relates to those parts of the City Plan controlling the growth of the City. The City Plan primarily manages urban growth through its objectives, policies and zoning pattern. The primary provisions relating to urban growth as found in Volume 2, Section 6 Urban Growth and Section 7 Transport.

The general City Plan urban growth objective is urban development patterns that promote sustainable resource management. Figure 3 is from Volume 2, Chapter 6 in the City Plan and summarises this urban growth strategy.

The general urban growth objective is linked to the primary objective for transport, being an efficient, safe and sustainable transport system in the City which provides for ease of accessibility for people and goods.

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65 Volume 2, Section 6.
66 Volume 2, Section 7.
In summary, the City Plan seeks the following outcomes for urban growth:

1. Urban consolidation and a compact urban form.

2. Close proximity and good accessibility between living, business and other employment areas.

3. Peripheral urban growth consistent with urban consolidation.

4. Peripheral urban growth has regard to the City’s natural, ecological, landscape and Tangata Whenua values, natural hazards and infrastructural resources.

5. A sustainable transport system.

6. An efficient and effective road network.

7. The recognition of public transport, and provision for cycling and safe pedestrian movement.

8. The maintenance and improvement of transport safety.

9. The recognition and the provision for regional, national and international transport links.

Further detail of the City Plan provisions is set out in the addendum to this section.

At the outset it is noted that the urban growth provisions in the City Plan were subject to considerable debate in front of the Environment Court before they became operative. The provisions in Volume 2, Part 6, and the correct legal interpretation of these, reflect one key Environment Court decision.\(^{67}\)

Since the City Plan became operative, the Greater Christchurch Urban Development Strategy 2007 has been adopted. The Urban Development Strategy is the result of a collaborative approach to urban growth management being pursued by Environment Canterbury, the Christchurch City Council, Selwyn and Waimakariri District Councils, and the New Zealand Transport Agency. This is now being implemented through a change to the Canterbury Regional Policy Statement (Proposed Change 1\(^{68}\)). In simple terms, Proposed Change 1 addresses land use and urban growth management in Greater Christchurch for the next 35 years. The Proposed Change includes maps defining areas for urban development and applies to Christchurch City (including the Lyttelton Harbour/Whakaraupō basin but excluding eastern Banks Peninsula) and the eastern parts of Waimakariri and Selwyn Districts. Change 1 is likely to influence in the way urban growth is managed within, and surrounding, Christchurch City. In particular, residential and business growth may occur.

\(^{67}\) Suburban Estates Ltd and others v Christchurch City Council (C217/2001).

\(^{68}\) As November 2010, Propose Change 1 is subject to appeals to the Environment Court.
In this section the significant metropolitan growth management process which is currently occurring is described, the outcomes from interviews with key City Council staff are recorded, effectiveness and then efficiency is considered, a summary of the key findings and recommendations is provided, and finally an addendum is included summarising the relevant City Plan provisions.

5.2.3 Interviews with City Council Staff

We interviewed key staff from plan policy and plan administration. The interviews focussed around the historical context behind the development of the urban growth objectives and policies and their anticipated environmental outcomes, and the extent to which the City Plan has achieved those stated outcomes.

The Urban Growth objectives and policies were prepared as an interim measures until a new sub-regional urban growth strategy was in place. The objectives and policies were intended to have a temporal application - that of a 10-year period being the life of a district plan. After that plan period, it was intended they be reviewed in light of an anticipated sub-regional urban growth strategy. This has coincided with the development of the Greater Christchurch Urban Development Strategy 2007 and notification of Proposed Plan Change 1 to the Canterbury Regional Policy Statement.

Figure 3 above (from the City Plan) regarding the urban growth strategy for the City is confusing and potentially misleading. The diagram is intended to be an indicative plan only to show where possible limited urban growth may occur and is not representative of the urban growth objectives and policies in the City Plan. Applicants for plan changes and resource consent applications consistently use this diagram to support their request for urban development.

The City Plan is successful in achieving its consolidation aspiration. Generally urban growth and development is contained within the urban zone boundaries as defined at time of release of City Plan decisions. The approach of rezoning a number of small areas of land around the edge of the existing urban area to accommodate future urban development on the basis of; minimising impact and cost on infrastructure, ensuring reasonable supply of land and providing a choice of locations has been successful. No large areas of land outside the urban zone boundaries have been lost to urban development. While urban development has resulted in a decrease in the City’s residential land bank, the extent of the decrease has not put pressure for urban development to occur outside of the urban zone boundary. The notification of Plan Change 1 to Regional Policy Statement will further relieve pressure for urban expansion beyond urban zone boundaries.

The City Plan has not met the community’s need for rural-residential development. This has resulted in diverting growth for this form of urban development to other districts such as Waimakariri and Selwyn District Councils. Further, the City Plan has effectively halted urban development on and along the Port Hills which are recognised as an important natural back drop to the City.

The City Plan has not been successful at promoting the Central City as the principle focus for commercial, administration and employment activities. The reasons for this are primarily economic and market based that go beyond what the City Plan can effectively manage. Much of the commercial and administration activity is relocating to the redeveloping and expanding Business 1 and Business 2 areas. Recent changes to the City Plan have gone some way to reduce the outward spread of commercial activity, particularly retail activity, however, this is viewed as ‘too little, too late’.

Overall, the City Plan provided an acceptable degree of certainty in term of providing suitable amount and spatial choice of urban zoned land and flexibility to provide for new urban areas through the plan change process where such areas are in accordance with the urban growth objectives and policies in

70 Variation 86.
valuating the effectiveness and efficiency of the Christchurch City Plan

the City Plan. However, there is some frustration at the length of time it takes for plan changes, both public and private, to be notified by the Council.

5.2.4 Effectiveness

The effectiveness of the City Plan is determined by how well it controls land use in order to achieve patterns of urban development which reflect the urban consolidation, central city as a principal focus, location and role of other commercial and industrial areas and peripheral urban development outcomes sought.

5.2.4.1 General comment

In Volumes 1 and 2 of the City Plan it records that the City Plan was prepared on the basis that between 1991 and 2011 the population of the City would increase by 30,000 (to 319,000) and household numbers by 17,000 (to 124,000). As a result of decisions, these projects were updated and further green fields residential land added in response to change in growth projections.

As shown in Figure 4, there is pressure on the vacant land within the City (the ‘land bank’) to accommodate growth. Since 1999 the amount of vacant land which is not under appeal has reduced by approximately 37% (from 1272 ha to 801 ha).

It does not necessary follow that this reduction in the amount of vacant land reduces the City Plan’s effectiveness. It is expected that following the 1999 release of green field land (i.e. undeveloped land generally on the edge of the City) and brown field land (i.e. developed land where the density of development can increase or urban land use change), that this land bank will be drawn down. Further, from an urban consolidation perspective decreasing the land bank may actually increase the City Plan’s effectiveness by constraining the size of the urban area. However, there may be consequences of this. These cannot be determined from the data available for this evaluation, but relate to the potential decentralisation of growth into the Greater Christchurch.

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71 See for example Volume 2, Part 6, Introduction
72 Source: CCC, Urban Growth Indicator Sheets, September 2009
area, and possible increases in the cost of land, both altering the efficiency of the City Plan. Both these matters are likely to be resolved through the Proposed Change 1 process.

5.2.4.2 Urban consolidation and compact urban area

Urban consolidation and a compact urban form relate to the size of the urban area of Christchurch and the population densities within that urban area.

Since 2001 overall population densities within the urban area of Christchurch have increased. This is in response to population increasing at a faster rate that the amount of residentially zoned land. Figure 5 shows the amount of residentially zoned land per person from the estimated usually resident population has decreased from approximately 432 m$^2$ in 2001 to 391 m$^2$ in 2009.

<table>
<thead>
<tr>
<th>Location of New Residential Units since 1991 by Area Unit</th>
<th>Location of New Residential Dwellings since 1991 by Area Unit</th>
</tr>
</thead>
</table>

Figure 6: New Multi-Unit and Apartment Residential Building Consents (left) and Dwellings (right) (1991 – 2009)

From the building consent data (see Figure 6$^{73}$), a distinct pattern of residential development is apparent. In general terms, new residential (multi-unit development and apartments) units are located around the centre city and specific nodes. In contrast, traditional dwellings are being located in greater numbers towards the periphery of the urban area of the City. This largely reflects the development pattern anticipated within the City Plan.

In absolute terms, since 2000 a greater proportion of residential development occurred on new development sites rather than within existing urban areas (redeveloped sites and added units). This trend is not

$^{73}$ Source: CCC, Urban Growth Indicator Sheets, December 2009

Figure 7: Type of Sites used for Residential Building Consents 1986-2009
consistent on a year by year basis. Towards the end of the period (2007-2008) the pattern was reversed. This is shown in Figure 774.

Therefore:

1. Residential development is resulting in increased density of development within the total urban area of the City.

2. Within the urban area, a majority of the new units are being located near the centre city or at defined nodes, whereas a majority of the dwellings are being located towards the periphery of the city or in new development areas.

Overall, the City Plan is effective in accommodating urban growth with a primary emphasis on consolidation.

5.2.4.3 Central City

The Central City is to be the principal focus for commercial, administration, employment, cultural and tourism activities.

Table 2 shows that between 2000 and 2008 the commercial floor space in the Central City commercial zones remained largely the same (a 4% increase over the eight years). In a similar period the number of business and employees within the Four Avenues75 gradually increased, although the year by year change is not linear. However, more importantly, the proportion of businesses and employees within the four avenues consistently decreased on a year by year basis.

<table>
<thead>
<tr>
<th>Year</th>
<th>Four Aves</th>
<th>CHCH</th>
<th>Four Aves as % of CHCH Total</th>
<th>Four Aves</th>
<th>CHCH</th>
<th>Four Aves as % of Christchurch Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>2000</td>
<td>5,634</td>
<td>28,906</td>
<td>19.5</td>
<td>45,420</td>
<td>156,380</td>
<td>29.0</td>
</tr>
<tr>
<td>2001</td>
<td>5,580</td>
<td>28,476</td>
<td>19.6</td>
<td>49,550</td>
<td>163,630</td>
<td>30.3</td>
</tr>
<tr>
<td>2002</td>
<td>5,615</td>
<td>28,684</td>
<td>19.6</td>
<td>47,840</td>
<td>163,470</td>
<td>29.3</td>
</tr>
<tr>
<td>2003</td>
<td>5,750</td>
<td>30,005</td>
<td>19.2</td>
<td>49,910</td>
<td>170,040</td>
<td>29.4</td>
</tr>
<tr>
<td>2004</td>
<td>5,976</td>
<td>32,781</td>
<td>18.2</td>
<td>51,130</td>
<td>178,850</td>
<td>28.6</td>
</tr>
<tr>
<td>2005</td>
<td>6,098</td>
<td>34,709</td>
<td>17.6</td>
<td>52,750</td>
<td>185,830</td>
<td>28.4</td>
</tr>
<tr>
<td>2006</td>
<td>6,136</td>
<td>36,259</td>
<td>16.9</td>
<td>52,260</td>
<td>188,310</td>
<td>27.8</td>
</tr>
<tr>
<td>2007</td>
<td>6,214</td>
<td>37,258</td>
<td>16.7</td>
<td>51,430</td>
<td>189,560</td>
<td>27.1</td>
</tr>
<tr>
<td>2008</td>
<td>6,139</td>
<td>37,825</td>
<td>16.2</td>
<td>51,630</td>
<td>194,190</td>
<td>26.6</td>
</tr>
<tr>
<td>2009</td>
<td>6,107</td>
<td>38,013</td>
<td>16.1</td>
<td>50,620</td>
<td>188,980</td>
<td>26.8</td>
</tr>
</tbody>
</table>

Table 2: Businesses and Employees within the Centre City (four avenues)

With the exception of public administration and utility services, the proportion of different types of businesses within the four avenues, compared with Christchurch as a whole, decreased76. However, this does not neatly correspond to the overall employee decrease77 in the Central City. Within the Central City the health, education, accommodation/food, professional and administration workforces proportionally increased between 2000 and 2009, in contrast to the decrease in the other business sectors.

74 Source: CCC, Urban Growth Indicator Sheets, January 2009.
75 An approximation of the Central City.
76 Central City Business, CCC Central Business District Reporting Sheet, February 2010.
77 Central City workforce, CCC Central Business District Reporting Sheet, February 2010.
In 2006, the usual resident population within the four avenues was approximately 2% of the City's population. Using this as a reference, between 1999 and 2010 a similar proportion (~2.5%) of residential dwellings and units were approved within the four Avenues, when compared with the rest of the urban area of the City. Therefore, the role of the central city as a place to reside is largely unchanged.

Information in the City Council’s Central City Revitalisation Strategy also assists in understanding the changing role of the Central City. From the Strategy:

- In recent years, only 15% of planned new office space is in the Central City (pg. 12)
- There is approximately 260,000 m² of retail floor space in the central City and 500,000 m² in the remainder of Christchurch (pg. 13)
- 4070 hotel beds, or 60% of Christchurch’s total nightly accommodation, are located in the Central City (pg. 15)
- 66% of residents participate in Central City festivals and events (pg 21).

Overall, there are a number of different trends within the Central City, with different underlying drivers. The City Plan can only control land use, which is only one of the influences. The strength of that influence is not clear from the available data. To fully achieve the objective of the City Plan with respect to the Central City requires a variety of other methods to be used to influence these trends, such as those set out in the City Council’s Revitalisation Strategy.

With respect to land use:

1. The City Centre is the focus for tourism and cultural activities, but the influence of the City Plan to achieving this is unknown.

2. The City Centre’s role as the principle focus for commercial and administration businesses, and overall employment, is diminishing. What cannot be determined is whether this results in it no longer being the ‘principal focus’ for these activities and what influence the City Plan may have. Therefore, again its effectiveness is unknown.

5.2.4.4 Suburban centres and industrial activities

In terms of suburban centres and industrial development, between 2000 and 2010, there was little change in the zoning pattern for these activities.

Between 2000 and 2009 on average the amount of vacant industrial land developed each year is approximately 22 ha (ranging between 30.7 ha and 7.2ha). At the end of June 2009, excluding the Special Purpose (Airport) Zone, approximately 330ha of vacant industrial land existed. The location of this land is shown in Figure 10.

Overall, across the City there is less than 1% change in the area of business zones resulting in little strategic change in zoning pattern.

However, there has been considerable commercial development outside of the Central City. This has occurred largely within the existing zones, or adjacent to these within living zones. Suburban centres have become larger, and received considerable reinvestment.

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78 Central City population, CCC Central Business District Reporting Sheet, November 2007.
79 From Central City Revitalisation Strategy Stage 2 (CCC, 2006).
80 City Plan Monitoring, Urban Growth, Indicator Reporting Sheet, November 2009.
Therefore, with the modernisation and increasing role of the suburban centres, the services, and hence proximity to those services, is also increasing. To this extent, the City Plan has resulted in a land use pattern that is effective if considered on this basis alone. However, when considered in a wider framework, including the role of the centre city, its effectiveness is questionable.

5.2.4.5 Peripheral urban growth

Peripheral urban growth is to be of a scale and character consistent with the primary emphasis of urban consolidation; avoids, remedies or mitigates its effects on a number of listed natural and physical resources; and which makes efficient use of infrastructure. This is implemented through the City Plan as part of zoning land from rural to urban.

Between 1999 (post release of City Plan decisions) and 2009 approximately 174 ha of land was rezoned from rural to some form of residential purposes. Figure 8 shows the land rezoned in 1999 in dark green. This occurred as a result of submissions to the proposed City Plan.

All this land is attached to the urban area, is not within the Christchurch International Airport 50 dBA Ldn noise contour, and is distributed over a number of locations.

The location of development in terms of, and its connection to, the transport network is typically a central consideration before the approval of new urban development areas. This assists to achieve the integrated management and sustainable transport outcomes sought within the City Plan. However, this influence is largely limited to ensuring the development of appropriate transport infrastructure in order to manage localised (sub-city scale) impacts of the development and provide opportunities for walking, cycling and passenger transport. Wider drives also have a direct influence in terms of the function of the road network and whether the opportunities provided for walking, cycling passenger

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Figure 8: Location of Land Zoned from Rural to Urban 1999 - 2009

Figure 9: Location of Vacant Industrial Land at 2009 (source: CCC, Urban Growth Indicator Sheets, October 2009)

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81 Source: CCC, Urban Growth Indicator Sheets, November 2009.
transport are realised. These include land transport funding choices, and social preferences and behaviour.

Putting this together, the City Plan is effective in controlling peripheral urban growth at urban densities to achieve a primary emphasis of urban consolidation. Individual processes enquired into the appropriateness of the zoning and determined that it is more appropriate it be zoned urban rather than rural.

5.2.5 Efficiency

Determining the efficiency of the management of urban development is very difficult at this strategic level. The City Plan can only control land use change. While it can use other methods to achieve the outcomes being sought, these largely rely on other statutory processes that are independent of the Resource Management Act, such as the Local Government Act. Putting to one side the efficiency of the different zones which are examined elsewhere in this report, in effect, it comes down to an assessment of whether:

1. The City Plan provides an appropriate amount of land at suitable locations for urban growth.

2. If it does not, whether the (public or private) plan change mechanism is efficient in remedying this situation.

The evidence is the residential land bank is reducing. We recollect that this is now of a size that leads to concerns during the land use development cycle. However, we note significant public\textsuperscript{82} and private\textsuperscript{83} plan changes are in process. Further, this issue is being grappled within Proposed Change 1 to the Canterbury Regional Policy Statement. Given the information we have at hand, we cannot draw any firmer conclusions of the efficiency of the City Plan on this matter.

\textsuperscript{82} Including Awatea

\textsuperscript{83} Including Wigram and Prestons Road
### 5.2.6 Summary of Effectiveness and Efficiency

The effectiveness and efficiency of City Plan policies, rules, or other methods in achieving its objectives is summarised in Table 3.

<table>
<thead>
<tr>
<th>Objective</th>
<th>Effectiveness</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>4.1 Form</td>
<td>High</td>
<td>The City’s distinctive form and recognisable form is maintained</td>
</tr>
<tr>
<td>4.2 Amenity</td>
<td>High</td>
<td>City’s natural and physical elements are recognised</td>
</tr>
<tr>
<td>6.1 Urban Consolidation</td>
<td>High</td>
<td>Increased density of development occurring within urban area of City.</td>
</tr>
<tr>
<td>6.2 Business activity</td>
<td>Unknown, but</td>
<td>Reduced primacy of the Central City as principal focus for commercial,</td>
</tr>
<tr>
<td>and urban growth</td>
<td>likely to be</td>
<td>administration activities.</td>
</tr>
<tr>
<td></td>
<td>medium</td>
<td></td>
</tr>
<tr>
<td>6.3 Peripheral urban</td>
<td>High</td>
<td>Urban growth occurring at locations and densities that achieve urban</td>
</tr>
<tr>
<td>growth</td>
<td></td>
<td>consolidation.</td>
</tr>
<tr>
<td>7.1 Sustainable</td>
<td>Medium</td>
<td>City Plan has limited influence at achieving sustainable transport system, except for ensuring new development is designed to facilitate this outcome.</td>
</tr>
<tr>
<td>transport system</td>
<td></td>
<td></td>
</tr>
<tr>
<td>7.2 Road network</td>
<td>Medium</td>
<td>City Plan has limited influence at achieving efficient and effective network, except for ensuring new development is located, and connects to, the road network in an appropriate way.</td>
</tr>
<tr>
<td>7.3 Public transport</td>
<td>Medium</td>
<td>City Plan has limited influence at providing public transport, except for ensuring new development is designed to facilitate this outcome.</td>
</tr>
<tr>
<td>7.4 Cyclists</td>
<td>Medium</td>
<td>City Plan has limited influence at providing for safe movement of cyclists, except for ensuring new development is designed to facilitate this outcome.</td>
</tr>
</tbody>
</table>

**Table 3: Summary of Effectiveness and Efficiency of the Urban Growth Group**

Resulting from this evaluation, it is recommended that the role of the City Plan in controlling land uses within, and which impact on, the Centre City is reconsidered as part of the review.
5.2.7 Addendum: Summary of the City Plan for the Urban Growth Group

<table>
<thead>
<tr>
<th>Objectives</th>
<th>Key Provisions</th>
</tr>
</thead>
</table>
5.3 Christchurch International Airport

5.3.1 Summary

The primary focus of the City Plan with respect to the Christchurch International Airport is to enable it to operate and further develop in a safe manner, without constraint by curfew, while controlling Airport noise. Christchurch International Airport Limited (CIAL) has a designation included in the City Plan for Airport Purposes over the Airport and the surrounding land. Provision is made for an airport related business hub (Special Purpose (Airport) Zone). Further, Airport sensitive activities are controlled in the adjoining Rural 5 Zone, largely by limiting the density of development so that it does not affect the operation of the Airport.

The City Plan, together with the designation, is highly effective in facilitating the operation and development of the Airport a safe manner without constraint by curfew. The 50 dBA airport noise contour (this contour denotes the future area within which noise levels are likely to normally exceed the 50 dBA Ldn sound level measurement resulting from the operation of aircraft in and around the Airport) is now well established following successive challenges in various RMA forums and contexts. While noise sensitive (generally residential) activities have established within the 50 dBA airport noise contour, this has occurred at the agreed locations (within the existing Living zones) or at relatively low densities in the Rural 5 Zone. No systemic undermining of the approach in the City Plan to the management of these activities is occurring. There is evidence of early resource consent applications being declined for unanticipated activities which may be the reason for the low level of development pressure experienced in the Rural 5 Zone.

The Special Purpose (Airport) Zone only effectively controls that development not undertaken by CIAL under its designation powers. This is because when CIAL exercises its designation, the provisions in the Special Purpose (Airport) Zone have no effect. When the zone provisions are relevant, a mixed result is produced. Land use outcomes expected, being a hub of business activities clearly associated with the operation and associated functions of the Airport and aviation, dominate. However, commercial activities with a relatively weak association with the Airport are being established through individual resource consent processes.

It is recommended that:

1. The role, purpose and need for the Special Purpose (Airport) Zone are reconsidered. In particular, this should include reviewing whether activities within this zone should be limited to those with a clear relationship with the airport, and how to best implement the outcome of this consideration.

2. The appropriateness of the generic transport rule thresholds for the Special Purpose (Airport) Zone are reviewed to determine if resource consent processes can be avoided.

3. The appropriateness of the protection of groundwater focus within the Special Purpose (Airport) Zone is reconsidered to remove duplication with Environment Canterbury’s Christchurch Groundwater protection regional plan provisions.
5.3.2 Introduction

The Christchurch International Airport Group covers those parts of the City Plan that relate to the Christchurch International Airport.

Christchurch International Airport (the Airport) is the main international and national airport in the South Island. It receives over 5.9 million passengers a year. In 2007, the Airport contributed 7.2% of Canterbury’s GDP and employed 8.8% of Canterbury’s (full time equivalent) workforce.84

This Group is made up of land within the 50dBa Ldn airport noise contour (See Figure 10). This contour denotes the future area within which noise levels are likely to normally exceed the 50 dBA Ldn sound level measurement resulting from the operation of aircraft in and around the Airport. Primarily this consists of the following City Plan areas:

1. Special Purposes (Airport) Zone.

2. The Christchurch International Airport Limited (CIAL) Airport Purposes Designation (covering approximately 750ha of land).

3. Land within the Rural 5 (Airport Influences) Zone, but only in relation to the airport protection function of this zone.

Figure 10: Christchurch International Airport group

The primary City Plan Transport objective is an efficient, safe and sustainable transport system in the City which provides for ease of accessibility people and goods. In summary, the City Plan seeks the following outcomes for these locations:

1. Christchurch International Airport is able to operate and further development in a safe manner and without constraint by curfew, while controlling the noise from the Airport.

2. The continued development of a hub of business activities clearly associated with the operation and functions of the Airport and aviation (Special Purposes (Airport) Zone). Business activities are anticipated to occur within a high noise environment, be high traffic generators, have specific hazardous substances management with respect to groundwater, and primarily manage amenity values in relation to surrounding land, not within the zone itself.

In this section: the outcomes from interviews with key City Council staff are recorded; using these interviews, available information and site visits, effectiveness and then efficiency is considered; a summary of the main findings and recommendations are set out; and finally an addendum is included summarising the relevant City Plan provisions.

5.3.3 Interviews with City Council Staff

We interviewed key staff from plan policy and plan administration. The focus of the interviews centred around four matters:

1. Noise sensitive activities occurring within the Rural 5 Zone which may influence the Airport.

2. Within the Special Purpose (Airport) Zone:
   a. Level of non-airport related activities occurring.
   b. Changes in the airport related business character.
   c. Changes in built form and intensity of development.

3. Land use impact upon continuing airport operations.

4. Workability of parts of the City Plan.

5.3.3.1 Noise sensitive activities in the Rural 5 Zone

There is a high level of interest from landowners and potential land developers for the establishment of non-rural activities. This is a result of land being: close proximity to central city, good access to the north and south of the city as well as to the Central City; proximity to the airport; and the high level of take up of land in the nearby Business 6 Zone.

While a number of above activities were established by way of resource consent application such activities were not opposed by CIAL as these were not viewed as ‘noise sensitive activities’ and did not pose a threat to a curfew on airport operations. Noise sensitive activities such as residential activity, cafes or restaurant seeking to establish in close proximity to the airport were strongly opposed by CIAL shaping the type of non-rural activities occurring that have established. Examples of such activities established in the zone include quarrying activities, vehicle storage and contractors’ yards.

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85 Volume 2, Section 7.
86 McLeans Island Road, Pound Road.
87 Harewood Road, McLeans Island Road.
88 Pound Road.
Overall, the majority of land remained used for low level animal grazing and ‘life style’ living as opposed to primary production. This zone is currently in a transition or ‘holding’ phase and more pressure will be brought to bear at the edges once land within the Special Purpose (Airport) Zone is fully developed.

5.3.3.2 Special Purpose (Airport) Zone

Within the Special Purpose (Airport) Zone are a range of established airport related commercial activities. Further, a number of significantly sized non-airport related activities are also present, establishing through the resource consent process\textsuperscript{89}. This is creating a perception that the location is suitable for general commercial activity area as opposed to a business area associated with the operation and function of the airport and aviation.

This issue will be exacerbated by a large area of undeveloped land to the south\textsuperscript{90} of the airport which is being prepared for development. This will make available a considerable area of land for airport related activities. Resource consents have already been approved for non-airport related activities\textsuperscript{91} within this area and CIAL has signalled it anticipates future uses being based around office development and possibly a supermarket.

A number of significant non-airport related activities are establishing within this zone. The majority are established using the designation powers of CIAL. The number of resource consents derived from the resource consent data-base was discussed, and initially Staff considered that this number overrepresented the use of the consent process itself\textsuperscript{92}. This trend is placing increasing pressure for this area to be recognised and developed for general commercial activity.

The commercial character associated with airport related business activities is well established and in accord with expected outcomes. There was no pressure for residential, recreational, community based or rural activities to establish in this area. However, the character of the commercial activity is changing from those commercial activities clearly associated with the operation and function of the airport\textsuperscript{93} to those of a more general commercial nature\textsuperscript{94}.

The bulk and location rules are appropriate for the establishment of large commercial buildings with associated areas of car parking, landscaping and outdoor storage and result in the achievement of the anticipated built form.

5.3.3.3 Land use impact upon continuing airport operations

Overall, the City Plan rules provide an appropriate level of protection for the continuing operation of the airport. CIAL is actively involved in the resource consent process particularly where noise sensitive activities seek to establish in close proximity to the airport.

5.3.3.4 City Plan implementation

For the Special Purpose (Airport) Zone, the Outline Development Plan process enables the CIAL to undertake development that by-pass or avoids the application of City Plan rules. This process limits Councils ability to control the effects of activities and has the effect of undermining the outcome sought in the City Plan. The Outline Development Plan process is viewed as a rubber stamping exercise. The activity based rule\textsuperscript{95} enabling a range of commercial activities is problematic in the

\textsuperscript{89} Examples: Recall New Zealand, Russley Road. NZPost Mail Centre, Orchard Road.
\textsuperscript{90} Bounded by Grays Road, Avonhead Road, Russley Road.
\textsuperscript{91} Recall New Zealand, Russley Road.
\textsuperscript{92} Examples: Recall New Zealand, Russley Road. NZPost Mail Centre, Orchard Road.
\textsuperscript{93} Example: Vehicle and product storage, product distribution, aircraft service and maintenance.
\textsuperscript{94} Example: Administration offices, service related businesses such as vehicle cleaning, WOF station, Tyre Shop.
\textsuperscript{95} Part 8, Rule 3.3.3 - Activities within Airport Zone
current effects based plan through the common application of the permitted baseline test for non-airport related commercial activities. Further, there are few landowners who could be affected by such activities. The activity based rule does not have a strong policy basis therefore making the declining of such activities difficult. Additional areas of concern with City Plan rules included car parking\textsuperscript{96} and outdoor advertising\textsuperscript{97}.

In the Rural 5 Zone, for activities requiring resource consent between the 55dBA and 65dBA contour lines, the majority of resource consent applications are for road scene, separation from neighbours and site coverage, which do not affect the Airport. For activities inside 50 dBA contour, the aircraft noise exposure rule\textsuperscript{98} is highly effective. Compliance is being achieved through the project information memorandum and building consent processes.

5.3.4 Effectiveness

The effectiveness of the City Plan is determined by how well it controls land use in order to achieve; the safe operation of the Airport without constraint by curfew, the development of an airport related business hub, and the continued primary production in the Rural 5 Zone.

5.3.4.1 Operation of the Airport

Christchurch International Airport continues to operate without curfew. CIAAL has the commercial confidence to invest in significant redevelopment and expansion of its airport operations.

Outline development plans were approved in relation to the Airport Purpose designation 22 times, including the proposed new domestic terminal building and new four storey carpark with office space. To put this in context, approximately 42%\textsuperscript{99} of the development proposals reflected in the resource consent database were achieved under the designation provisions in RMA, rather than rule framework within the City Plan. This indicates that for core airport activities controlled by CIAAL, it has the ability to achieve its particular operation and development aspirations for the Airport.

For the 2008 calendar year the CIAAL Airport noise monitoring report\textsuperscript{100} demonstrates that noise from aircraft operations in 2008 was approximately 3 - 4 decibels below the limit and hence comfortably complied\textsuperscript{101}. The calculated noise contours from this report are reproduced in Figure 11.

\begin{figure}[h]
\centering
\includegraphics[width=\textwidth]{figure11.png}
\caption{Noise from Christchurch International Airport}
\end{figure}

\begin{footnotesize}
\textsuperscript{96} There is no category for airport and airport related activities in Part 13 Transport, Table 1b – Minimum parking required in all zones.
\textsuperscript{97} Large frontages enable very large areas of advertising to establish as of right.
\textsuperscript{98} Part 4, Rule 3.4.2 - Aircraft noise exposure.
\textsuperscript{99} Fifty three developments can be identified from the resource consent data-base once subdivisions, certificates, consent variations and unknown entries are removed.
\textsuperscript{100} Noise Monitoring Report in relation to Volume 3, Part 11, Rule 1.3.5 of the Christchurch City Plan.
\textsuperscript{101} Christchurch International Airport 2008 Aircraft Operations Noise Monitoring Report, pg. 10 of 19.
\end{footnotesize}
The 50 dBA airport noise contour (this contour denotes the future area within which noise levels are likely to normally exceed the 50 dBA Ldn sound level measurement resulting from the operation of aircraft in and around the Airport) is now well established following successive challenges in various RMA forums and contexts.\(^{102}\)

Residential (noise sensitive) development is continuing within the 50 dBA Ldn airport noise contour. Approximately 530 new dwellings received building consent between 2000 and 2010. The bulk of these consented dwellings occurred in locations where such development is provided for in the City Plan, being within existing Living Zones, with approximately 60 being located in the Rural 5 Zone. There is a distinctive temporal pattern to the consented dwellings in the Rural 5 Zone, with approximately 57% receiving consent between 2000 and 2003. The conclusion is the effectiveness of the City Plan has increased over time. Key resource consent decisions refusing development have established precedent, influencing landowners’ perception of the possible likely success of similar development applications.

Within the 50 dBA Ldn airport noise contour only 6 non-compliances\(^{103}\) were identified for breaches of the minimum site size rule in rural zones, all of which were granted. This number may understate the potential for new dwellings at higher density than anticipated by the City Plan in this area, as in the same period an analysis of change in land parcel size show 36 new land parcels were created between the size of 1ha and 4ha.

The building consent records show approximately 80 new dwellings were approved between the 55 and 65 dBA Ldn airport noise contours. There are 3 or less non-compliance with the airport noise insulation rule recorded in the resource consent data-base, all within the rural zone.\(^{104}\)

5.3.4.2 Airport business hub

The purpose of the Special Purpose (Airport) Zone is to facilitate the development of a hub of business activities relating to the operation or associated function of the airport.

In 2010 the Council’s rating data-base shows that land within the Special Purpose (Airport) Zone is predominately used for industrial or commercial (77%) purposes, with small amounts of rural (7%) and recreation (7%) land. The remaining land uses are mixed with only one property is identified as being used for residential purposes.

Forty eight building consents were granted for other than dwellings of an estimated value of in excess of $40,000 between 2000 and 2010 in the Special Purpose (Airport) Zone. In the same period 12 demolition consents were granted. These consents cover both airport and related activities. Both types of building consents show a relatively consistent year on year number pattern.

The resource consent data shows that of the 53 developments which required land use consent between 2000 and 2010\(^{105}\), all applications were granted. As shown in Table 4, the greatest proportion of consents

<table>
<thead>
<tr>
<th>Area of compliance</th>
<th>Number of proposals</th>
<th>% of proposals</th>
</tr>
</thead>
<tbody>
<tr>
<td>Transport</td>
<td>11</td>
<td>35</td>
</tr>
<tr>
<td>SP Airport zone rules</td>
<td>6</td>
<td>19</td>
</tr>
<tr>
<td>Hazardous substances</td>
<td>6</td>
<td>19</td>
</tr>
<tr>
<td>Outdoor advertising</td>
<td>4</td>
<td>13</td>
</tr>
<tr>
<td>Utilities</td>
<td>3</td>
<td>10</td>
</tr>
<tr>
<td>Miscellaneous</td>
<td>3</td>
<td>10</td>
</tr>
</tbody>
</table>

Table 4: Different Land Use Non-compliances 2000-

\(^{102}\) Local hearings and the Environment Court, including for individual resource consent applications, the City Plan, Waimakariri and Selwyn district plans and Proposed Change 1 to the CRPS.

\(^{103}\) Non-compliance code RUMIN.

\(^{104}\) Non-compliance code RUAIR, there is no entries for LIAIR. It is noted that there are a considerable number of entries (approximately 35% (of 410 entries) with no non-compliance code entry.

\(^{105}\) This excludes subdivision consent and the use of designations.
were required because of the transport rules (approximately 35%) followed by the Special Zone rules (19%) and hazardous substances rules (19%).

For transport breaches, all the proposals are coded as breaching the high traffic generation rule[^106], transport generation rule for either vehicle per day (250) or car park number (25), with nine of the eleven breaching with respect to car parking numbers.

The resource consent data-base does not easily allow consideration of the land use activities which have been established between 2000 and 2010 in the Special Purpose Airport Zone. Of the six proposals that may not of complied with the Special Purpose Airport Zone rules, none of the descriptions in the resource consent data-base indicate activities which are noise sensitive (e.g. residences) or the type of activities that are anticipated to occur within the zone[^107].

A visual inspection of the Special Purposes Airport Zone confirmed the strong commercial characteristic of the development occurring. However, it is difficult to associate a number of these commercial activities directly with the airport and therefore the type of activities indicated by the City Plan rule[^108]. Picture 1 depicts an example of this.

Further, as a result of the generic coding of non-compliances, there is limited information available as to the bulk, location and street scene rules, and whether proposals are being granted resource consent to breach these. In addition, the information does not allow the evaluation of whether development achieved using designation powers is taking into account the city Plan rules on these matters.

Finally, turning to hazardous substances and Christchurch groundwater, six proposals were granted resource consent. Of these, the descriptions in the resource consent data-base indicate that three clearly relate to aviation activities, with one yet to be established. Of the remaining two, one relates to a car rental activity and the purpose of the other cannot be determined. The land use changes in relation to hazardous substances occurring as a permitted activity cannot be determined from the information at hand. However, the special Purpose Airport Zone is in the most ‘enabling’ group for permitted amounts of hazardous substances[^109].

[^106]: Volume 3, Part 13, Rule 2.3.8.
[^107]: Volume 3, Part 89, Rule 3.3.3.
[^108]: Volume 3, Part 8, Rule 3.3.3.
5.3.5 Efficiency

5.3.5.1 Special Purpose Airport Zone

The efficiency of the Special Purpose Airport Zone is influenced by the Airport Designation of CIAL. As identified earlier, approximately 42% of the development proposals reflected in the resource consent data-base were achieved under the designation provisions in RMA, rather than rule framework within the City Plan. The efficiency of this resource management control is determined by the Act, not the City Plan. Therefore, the efficiency of the City Plan in relation to the operation and development of the Airport by CIAL is largely neutral as its rules do not control this form of development.  

With respect to those controls on land use that do have effect, Table 5 shows the majority of resource consent applications were processed non-notified, and all applications were granted in some form. This indicates those non-compliances were considered to have insignificant effects on the environment for the purposes of determining the process the resource consent application was to follow, or the City Plan had already determined that public notification was not required. It is therefore not surprising that largely all such applications were granted.

<table>
<thead>
<tr>
<th>Process</th>
<th>Granted</th>
<th>Declined</th>
<th>Not known</th>
<th>TOTAL</th>
</tr>
</thead>
<tbody>
<tr>
<td>Non notified</td>
<td>59</td>
<td>0</td>
<td>1</td>
<td>60</td>
</tr>
<tr>
<td>Service</td>
<td>1</td>
<td>0</td>
<td>0</td>
<td>1</td>
</tr>
<tr>
<td>Notified</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Not known</td>
<td>21(^{113})</td>
<td>0</td>
<td>2</td>
<td>23</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>81</strong></td>
<td>0</td>
<td><strong>3</strong></td>
<td><strong>84</strong></td>
</tr>
</tbody>
</table>

Table 5: SP (Airport) Zone Resource Consents Processes by Outcome 2000 - 2010\(^{114}\)

It is not surprising that Table 6 does not show any process differentiation between the different standards (development, community and critical) in the City Plan. However, it does demonstrate that applicants choose to breach the development and community standards more frequently than the critical standards.

<table>
<thead>
<tr>
<th></th>
<th>Controlled</th>
<th>Limited discretionary</th>
<th>Discretionary</th>
<th>Non complying</th>
<th>Unknown</th>
</tr>
</thead>
<tbody>
<tr>
<td>Non notified</td>
<td>5</td>
<td>29</td>
<td>7</td>
<td>12</td>
<td>-</td>
</tr>
<tr>
<td>Service</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Notified</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Unknown</td>
<td>-</td>
<td>1</td>
<td>-</td>
<td>-</td>
<td>1</td>
</tr>
</tbody>
</table>

Table 6: SP (Airport) Zone Resource Consent Activity Status by Process 2000-2010\(^{115}\)

\(^{110}\) Fifty three developments can be identified from the resource consent data-base once subdivisions, certificates, consent variations and unknown entries are removed.

\(^{111}\) An alternate view point is that the efficiency of the City Plan provisions is less than those of the designation provisions in the Act as CIAL chooses to use the provisions of the RMA to achieve the desired City Plan outcome.

\(^{112}\) Which it can only do so for controlled and restricted discretionary activities, which represent 2240 and 12390 non-compliances respectively.

\(^{113}\) Largely outline plans associated with the Airport Purposes designation.

\(^{114}\) Subdivision consents have largely been excluded from this table.

\(^{115}\) Subdivision consents have largely been excluded from this table.
5.3.5.2 General comments

Within the Special Purpose Airport Zone provisions it is stated that protecting Christchurch Groundwater is one of the anticipated environment results expected of the implementation of the City Plan. Environment Canterbury has moved to exercise its functions for the purpose of controlling land use to achieve this outcome116. It is reasonably likely to expect that this variation will become operative in 2010. Depending on its operative form, the city Council may wish to consider reviewing the City Plan provisions on this matter to avoid inefficiencies associated with duplication of control for the same purpose.

5.3.6 Summary of Effectiveness and Efficiency

The effectiveness and efficiency of City Plan policies, rules, or other methods in achieving its objectives is summarised in Table 7.

<table>
<thead>
<tr>
<th>Objective</th>
<th>Effectiveness</th>
<th>Efficiency</th>
</tr>
</thead>
<tbody>
<tr>
<td>6.3</td>
<td>High</td>
<td>Residential development occurring in a manner that is not impacting upon the safe operation of the Airport without constraint by curfew.</td>
</tr>
<tr>
<td>7.7</td>
<td>High</td>
<td>Transport safety of people and good between Airport and City retained.</td>
</tr>
<tr>
<td>7.8</td>
<td>High</td>
<td>Transport links between Airport and City retained.</td>
</tr>
<tr>
<td>10.3</td>
<td>High</td>
<td>Permitted and approved activities are not impacting upon the airport related amenity in Special Purpose Airport Zone. Limited number of persons exposed to aircraft noise.</td>
</tr>
<tr>
<td>12.1</td>
<td>Medium</td>
<td>Business activity is occurring which meets economic needs, but is blurring the distinction of the airport related hub.</td>
</tr>
<tr>
<td>13.3</td>
<td>High</td>
<td>Airport continues to operate in a manner without constraint by curfew.</td>
</tr>
<tr>
<td>14.5</td>
<td>High</td>
<td>Noise sensitive activities are not establishing.</td>
</tr>
</tbody>
</table>

Table 7: Summary for the Christchurch International Airport Group

Resulting from this evaluation, it is recommended that:

1. The role, purpose and need for the Special Purpose (Airport) Zone are reconsidered. In particular, this should include reviewing whether activities within this zone should be limited to those with a clear relationship with the airport, and how to best implement the outcome of this consideration.

2. The appropriateness of the generic transport rule thresholds for the Special Purpose (Airport) Zone are reviewed to determine if resource consent processes can be avoided.

3. The appropriate of the protection of groundwater focus within the Special Purpose (Airport) Zone is reconsidered to remove duplication with Environment Canterbury’s Christchurch Groundwater protection regional plan provisions.

116 Variation 6 to the Proposed Canterbury Natural Resources Regional Plan.
### 5.3.7 Addendum: Summary of the City Plan for the Christchurch International Airport Group

<table>
<thead>
<tr>
<th>Objectives</th>
<th>Key Provisions</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Urban Growth Objective</strong></td>
<td>Continued unrestricted, effective and efficient operation and growth of operations at Christchurch International Airport.</td>
</tr>
<tr>
<td>Urban development patterns that promote sustainable resource management.</td>
<td>1. Protection of future residents from noise</td>
</tr>
<tr>
<td><strong>Transport Objective</strong></td>
<td>2. Safe air corridors for aircraft</td>
</tr>
<tr>
<td>An efficient, safe and sustainable transport system in the City which provides for ease of accessibility people and goods.</td>
<td>3. Limitation of residents exposure to aircraft noise</td>
</tr>
<tr>
<td><strong>Subdivision and Development Objective</strong></td>
<td>4.</td>
</tr>
<tr>
<td>That the values and functioning of natural and physical resources are maintained when the process of land subdivision and/or development takes place, recognising anticipated land use activities.</td>
<td><strong>Zone description and purpose</strong></td>
</tr>
<tr>
<td><strong>Business Objective</strong></td>
<td>Development clearly associated with operations and sufficient function of the airport and aviation (Special Purpose (Airport) zone).</td>
</tr>
<tr>
<td>A distribution, and diverse range, of business environments which meet the social and economic needs of the wider community, while avoiding, remediating or mitigating the potential adverse effects of their activities within the immediate area, and on the broader surrounding environment.</td>
<td><strong>Zone AERS</strong></td>
</tr>
<tr>
<td><strong>Rural Objective</strong></td>
<td>Special purposes (Airport) zone</td>
</tr>
<tr>
<td>The sustained potential of land, soil, water and infrastructural resources in the rural area to support life and to meet reasonably foreseeable future rural and urban needs.</td>
<td>1. Development and intensification of building and airport support activities</td>
</tr>
<tr>
<td><strong>Open Space Objective</strong></td>
<td>2. High noise impacts</td>
</tr>
<tr>
<td>Quality open space and a range of recreational opportunities in the City.</td>
<td>3. Relatively high levels of traffic generation</td>
</tr>
<tr>
<td><strong>Specific objectives</strong></td>
<td>4. High standards of amenity and landscaping around the each of the zone and along major roads</td>
</tr>
<tr>
<td>6.3 Peripheral urban development of a scale and character consistent with a primary emphasis on urban consolidation; which avoids, remedies or mitigates adverse impacts on water, versatile soils, or significant amenity values and other natural resources; and which makes efficient use of physical infrastructure.</td>
<td>5. Containment of any hazardous substances</td>
</tr>
<tr>
<td>7.7 The maintenance and improvement of transport safety throughout the City.</td>
<td><strong>Policy areas</strong></td>
</tr>
<tr>
<td>7.8 Recognition of the need for regional, national and international links within the City and provision for those links.</td>
<td>1. Airport operations</td>
</tr>
<tr>
<td>10.3 That the amenities of the built environment be maintained or enhanced through the subdivision process, and that the operation of physical infrastructure, and the cost of its provision, not the adverse affected by subdivision proposals.</td>
<td>2. Airport services</td>
</tr>
<tr>
<td>12.1 A distribution, scale and form of business activity which meets the economic needs of businesses, provides the community with convenient access to goods, services and opportunities for social interaction, and which:</td>
<td>3. Air and rail safety</td>
</tr>
<tr>
<td>(a) is able to be efficiently serviced by infrastructure, including water, effluent disposal and roading;</td>
<td>4. Roading and services</td>
</tr>
<tr>
<td>(b) encourages in appropriate circumstances:</td>
<td>5. Management of business activity</td>
</tr>
<tr>
<td>• co-location of community services and facilities within the central city and district centres;</td>
<td>6. Distribution of commercial activity</td>
</tr>
<tr>
<td>• consolidation of residential development around selected consolidation focal points;</td>
<td>7. Distribution of industrial activity</td>
</tr>
<tr>
<td>• accessibility, by a variety of modes of</td>
<td>8. Building development</td>
</tr>
<tr>
<td></td>
<td>9. Land use patterns and expectations</td>
</tr>
<tr>
<td></td>
<td>10. Rural intensive farming</td>
</tr>
<tr>
<td></td>
<td>11. Rural dwelling densities</td>
</tr>
<tr>
<td></td>
<td>12. International airport operations</td>
</tr>
<tr>
<td></td>
<td>13. Bird strike issues</td>
</tr>
</tbody>
</table>
transport, to centres providing a wide range of public and private services and facilities; and

(c) manages the adverse effects of business activities on the environment, including:

- maintaining or improving the safety and efficiency of the road network and related systems for all users (including public transport, pedestrians and cyclists), and minimising unnecessary trip generation;
- maintaining the amenity of residential and other sensitive environments (including local roads);
- ensuring the function, vitality and amenity of those existing centres that provide a wide range of public and private services and facilities to the community will not be significantly affected by new retail activity; and
- minimising contamination, pollution, odour, hazardous substances, noise and glare.

14.5 To have regard to the operations of the Christchurch International Airport when considering development within Open Space zones.
5.4 Coastal Environment

5.4.1 Summary

The coastal environment is that part of the City significantly influenced by coastal processes. For this group, the focus is on those City Plan zones which recognise this – the Conservation 1A and Rural 1 zones. Both these zones seek to protect the natural and human values of the coastal environment, manage the effects of land use, including relating to coastal hazard management.

The Canterbury Regional Coastal Environment Plan also controls land uses for reasons of coastal hazards within the coastal area. In addition, for proposals that fall within the Coastal Marine Area\(^\text{117}\), it is the primary regulator. There is overlap in the direct management of the natural values of the coastal environment, particularly in circumstances which both agencies require resource consent.

The City Plan is of high effectiveness in the Conservation 1A zoned area. There has been little change in land use. What has occurred largely relates to community and recreation activity or historic land uses.

The City Plan is of medium effectiveness in the Rural 1 zoned area. Overall, this area remains a low density rural environment which has experienced a low level of change since 2000. However, there are three specific locations which form an exception to this - Waitikiri Drive, Lower Styx Road, and Blue Lagoon Drive/Shammys Place. The residential character of these areas is no longer in keeping with the anticipated Rural 1 Zone outcomes. There are unique and different circumstances associated with all three areas.

The efficiency of the Conservation 1A and Rural 1 zones is difficult to judge because of the overall low level of activity. Therefore, efficiency is largely unchanged.

It is recommended that:

1. The respective roles of Environment Canterbury and the City Council is reviewed in order to determine with overlap in regulation of land use can be reduced.

2. The appropriateness of Waitikiri Drive, parts of Lower Styx Road, and Blue Lagoon Drive/Shammys Place, areas remaining zoned Rural 1 is reviewed.

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\(^{117}\) Coastal marine area means the foreshore, seabed, and coastal water, and the air space above the water—

(a) Of which the seaward boundary is the outer limits of the territorial sea:

(b) Of which the landward boundary is the line of mean high water springs, except that where that line crosses a river, the landward boundary at that point shall be whichever is the lesser of—

(i) One kilometre upstream from the mouth of the river; or

(ii) The point upstream that is calculated by multiplying the width of the river mouth by 5.

(Section 2 of the RMA)
5.4.2 Introduction

The Coastal Environment Group relates to those parts of the City Plan which provide for the management of the coastal environment (see Figure 12).

This Group is made up of two different City Plan areas, being:

1. Conservation 1A (Coastal Margins) Zone. The Coastal 1A Zone is located in the coastal dunes and margins. It stretches (not continuously) from the Waimakariri River mouth to approximately Boulder Bay (Godley Head).

2. Rural 1 (Coastal) Zone. The Rural 1 Zone is located in that part of the rural area of the City which is strongly influenced by the coastal processes.

The primary City Plan coastal objectives relate to the:

1. Natural environment, being maintenance and enhancement of the quality of natural resources and their ability to meet the needs of present and future generations118.

2. Rural environment, being the sustained potential of land, soil, water and infrastructural resources in the rural area to support life and to meet reasonably foreseeable future rural and urban needs119.

In summary, the City Plan seeks the following outcomes for these locations:

1. Protection of the coastal environment, particularly significant natural flora and fauna.

2. Maintenance and enhancement of public access to the coast.

3. The management of coastal hazards.

4. In the Conservation 1A Zone, the protection of the natural character, integrity, functioning and resilience of coastal margin.

5. In the Rural 1 Zone, the low intensity rural uses, including forestry, with an overall low density of building and residential activity, resulting in the maintenance of the predominant open visual characteristics of the area.

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118 Volume 2, Section 2.
119 Volume 2, Section 13.
At the outset it is noted that the coastal environment is the subject of dual management under the RMA. Environment Canterbury has prepared the Canterbury Regional Coastal Environment Plan (operative 30 November 2005). It identifies a number of areas of significant or high natural values in Christchurch City\(^{120}\), defines coastal hazards areas in Christchurch City, and includes rules in relation to coastal water quality, activities and occupation in the coastal marine area and land uses with the identified coastal hazard areas.

In this section the outcomes from interviews with key City Council staff are recorded, effectiveness and then efficiency is considered, a summary of the key findings and recommendations is provided, and finally an addendum is included summarising the relevant City Plan provisions.

### 5.4.3 Interviews with City Council Staff

We interviewed key staff from plan policy and plan administration. The focus of the interviews centred around five matters:

1. The level of activities (rural or otherwise) occurring in the coastal environment and their impact on associated natural values.
2. The level of non-rural activities in the Rural 1 Zone and the effect on primary focus of maintaining low density rural land uses.
3. Impact of development on natural, open character of the coastal environment.
4. Maintaining and enhancing public access.
5. Workability of parts of the City Plan.

#### 5.4.3.1 Land use activities in the Conservation 1A Zone

Much of the coastal land is City Council owned with very small areas in private ownership. Consequently, very few activities have established. Examples of note include redevelopment of two restaurants in Sumner. However, these have been established for some time and are not recent developments. Consequently, there has been very little change or impact on the natural values associated with the coastal environment.

In addition to Council land ownership, Environment Canterbury performs an important role as regulator through its granting of global consents to manage activities within coastal dunes namely; dune height, tracks across dunes and vegetation management on dune. Environment Canterbury’s consenting processes creates a ‘belts and braces’ approach to managing the effects of activities in the coastal environment which, in turn, maintains the natural values in the Conservation 1A Zone.

There have been inquiries regarding the development of both rural (forestry) and small scale tourist related commercial activities, such as food stalls and souvenir sales within the coastal environment, but nothing of substance has eventuated. Given the level of Council land ownership, there is very little pressure for development of land within the Conservation 1A Zone.

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\(^{120}\) For example: Waimakariri River mouth and Brooklands Lagoon, Heathcote and Avon Estuary/Ihutai, Scarborough Cliffs and Godley Head, and the Christchurch foreshore.
5.4.3.2 Land use Activities in the Rural 1 Zone

A large area of land in the Rural 1 Zone is owned by the Selwyn Plantation Board and remains in forestry. The forestry area is subject to a Management Plan which limits the ability for this area to be used for activities other than forestry and recreation. Consequently, there is very little change or impact on the natural values associated with this part of the coastal environment.

Some historical land subdivision for residential activity occurred in this zone. These are generally small developments, being extensions to existing urban development. In addition, some environmental compensation and/or large reserve areas was offered to Council through the subdivision approval process. These residential subdivisions, and resulting land uses, do not detrimentally impact upon the overall low density characteristics of the Rural 1 Zone.

5.4.3.3 Impact upon the character of the coastal environment

While the coastal environment has generally retained its open and natural characteristics, it is significantly modified. Much of the coastal area is subject to some form of rock protection works. Further, a number of historical and illegal structures have established within the Conservation 1A Zone. These impact upon the natural qualities associated with the coastal environment. However, the extent of these structures within the coastal environment is considered relatively minor and overall the integrity of the natural and open visual character of the coastal environment remains intact.

5.4.3.4 Public access

The City Plan’s role in maintaining and enhancing public access is relatively minor and not particularly influential. Other mechanisms outside of City Plan zone rules are considered more effective and meaningful. The main instruments to ensuring public access are through Council land ownership and land acquired through the subdivision process and being effectively managed through the reserves management plan process.

5.4.3.5 City Plan implementation

Given Council’s significant ownership of land in the coastal environment, the role of City Plan rules in managing the coastal resource is secondary. City Plan rules are complimentary to other mechanisms and act as ‘belts and braces’ in managing the coastal environment. There is a question around the necessity for rules in the respective Conservation 1A and Rural 1 Zones.

Both the City Plan and Environment Canterbury’s Regional Coastal Environment Plan regulate activities in the coastal environment. There are a number of anomalies and little correlation between the two planning documents. For example, in some locations, the coastal hazard line on the relevant City Plan maps does not match the hazard zone boundaries shown on the coastal hazard zone maps in the Coastal Environment Plan. The City Plan should align more closely and pragmatically with the Regional Coastal Environment Plan.

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121 Bottle Lake Forest.
122 Waitikiri Drive, Lower Styx Road, Blue Lagoon/Shammys Road.
123 Surf Clubs, Sumner Restaurants, The Brighton Pier.
124 Private jetties, walkways generally for the purpose of serving private properties.
126 Identified as Hazard line 1 on City Planning Maps, B Series.
5.4.4 Effectiveness

The effectiveness of the City Plan is determined by how well it controls land use in order to achieve; the protection of the natural values and facilitation of public access in the Conservation 1A Zone, and the continued low intensity land (generally rural) uses in the Rural 1 Zone.

5.4.4.1 Conservation 1A Zone

The Conservation 1A Zone provides for the protection of the natural values of the coastal margin and seeks to facilitate public access.

As of 2010, the predominant activities occurring in this zone are conservation, recreation and community based\textsuperscript{128}. There is a largely historic small area of residential properties located at the tip of South Brighton which partly fall within this zone. Picture 2 shows a typical example of the Conservation 1A Zone.

Little significant land use activity has occurred within this zone since 2000. By reference to the building consent data-base, no dwellings occurred, and only two building consents were granted for non-residential building work exceeding $40,000 in estimated value – one of these was for a public recreation facility and the other to a tree nursery\textsuperscript{129}.

Between 2000 and 2010 eleven land use consents were received and all granted. Ten of these related to conservation, recreation and community facilities, two to alterations to existing buildings, two to utility infrastructure, two to new dwellings and one to a new tree nursery. Overall, with the exception of the dwellings\textsuperscript{130}, this represents a level and type of consent activity that would be anticipated in this zone. Recognising that the City Council controls a considerable portion of the land in this zone, this represents an opportunity to increase the efficiency of the City Plan by avoiding unnecessary duplication.

With respect to public access, staff are of the view that the City Plan has a relatively small influence. The City Plan’s role is limited to the taking of land for esplanade reserves and strips and access strips in accordance with Volume 3, Part 14, Appendix 1 and by using the environmental compensation provisions. While these provisions may be used infrequently, they remain important.

\textsuperscript{128} Based on the use data from the rating data-base, at least 58%. A further 31% is categorised as largely unimproved.

\textsuperscript{129} Marine Parade and Charlesworth Street respectively.

\textsuperscript{130} These may be a result of coding errors in the resource consent data-base. Both were granted in the 2004/2005 period. No building consent for new dwellings show in this zone.
5.4.4.2 Rural 1 Zone

The purpose of the Rural 1 Zone is to maintain low intensity rural uses, including forestry, with an overall low density of building and residential activity.

In 2010, land use within the Rural 1 Zone is consistent with the outcomes anticipated for this zone, being forestry, unimproved (11%), general rural use, recreation and conservation. This is summarised in Figure 13.

The total area of land used for predominately residential purposes is very small (4% made up of 86 properties). However, spatially these are concentrated in three main areas – on the west side of Waitikiri Drive, on the west side of Lower Styx Road, and in the Blue Lagoon Drive/Shammys Place area. The changes in land parcel size analysis indicate that all three areas have largely developed since 2000. This is reinforced by the building consent data-base, with 82% (46) of the building consents for new dwellings occurring in these locations. The resource consent data-base indicates a similar pattern of activity, with a large majority of entries relating to the subdivision and land use non-compliances for the development located at Waitikiri Drive, Lower Styx Road, and the Blue Lagoon Drive/Shammys Place.

Discussions with staff confirmed all three areas have unique sets of circumstances associated with them. Further, in relation to the Lower Styx Road development, the environmental compensation policy was a factor in the decision making. All these areas have a character that is more akin to the adjoining living zones, than the Rural 1 Zone. Picture 3 shows an example of this.

Outside of these three locations, there is an overall low level of building activity, with only a further ten new dwellings and three non-residential building consents of an estimated value of greater than $40,000 being granted. Of these non-residential building consents, two relate to recreation activities.

131 In this instance this data-base needs to be treated with caution, as 31% (32) have no non-compliance entered. A further 39% (30) have a non-compliance code entered relating to another zone within the City Plan, but which however appear with street addresses within the rural 1 Zone.
5.4.5 Efficiency

The overall level of activity within the Conservation 1A and Rural 1 zones is too small to enable a full evaluation of the efficiency of the City Plan rules to be undertaken. A similar pattern occurs in these locations as across many other parts of the City Plan. That is, a high proportion of the land use consent applications are processed without public notification and granted. However, three subdivision applications on Lower Styx Road were publicly notified, and ultimately granted. Given the outcomes being sought from these subdivisions are not an anticipated outcome within this zone, these three processes indicate issues with the original zoning pattern. Reducing the overlap with Environment Canterbury’s regulation provides an opportunity to increase the efficiency of the City Plan rules.

5.4.6 Summary of Effectiveness and Efficiency

The effectiveness and efficiency of City Plan policies, rules, or other methods in achieving its objectives is summarised in Table 8.

<table>
<thead>
<tr>
<th>Objective</th>
<th>Effectiveness</th>
<th>Efficiency</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.2 Water</td>
<td>Low/Medium</td>
<td>Environment Canterbury is the primary authority for water quality and quantity. The City Plan controls land use type and intensification and provision of new esplanade reserves and strips.</td>
</tr>
<tr>
<td>2.4 Natural features and habitats</td>
<td>Medium/High</td>
<td>Land use type and change in the coastal environment is appropriate, but Environment Canterbury also an influential regulatory body. There are isolated areas that may be more appropriately zoned for other purposes</td>
</tr>
<tr>
<td>2.6 Coastal environment</td>
<td>Medium/High</td>
<td>Environment Canterbury is the primary authority for this matter. The City Plan controls land use type and intensification.</td>
</tr>
<tr>
<td>4.1 Form</td>
<td>Medium/High</td>
<td></td>
</tr>
<tr>
<td>5.1 Maori and their resources</td>
<td>Unknown</td>
<td>This can only be determined through consultation with tangata whenua</td>
</tr>
<tr>
<td>10.2 Subdivision and natural hazards</td>
<td>Unknown</td>
<td>The resource consent data does not allow this to be evaluated</td>
</tr>
<tr>
<td>13.1 Rural land and soil resource</td>
<td>Medium</td>
<td>Limited land use change has occurred, but where it has it resulted in residential or lifestyle areas. Rural production is limited and being replaced by lifestyle activities.</td>
</tr>
<tr>
<td>13.2 Water resources</td>
<td>Medium</td>
<td>Environment Canterbury is the primary authority for this matter. The City Plan controls land use type and intensification.</td>
</tr>
<tr>
<td>14.1 (Open Space) Provision and diversity</td>
<td>Medium</td>
<td>The City Plan reflects existing open space. New open space is largely acquired outside Resource Management Act processes</td>
</tr>
</tbody>
</table>

Table 8: Summary of Effectiveness and Efficiency of the Coastal Group

Resulting from this evaluation, to increase effectiveness and efficiency, we recommend that:

1. The respective roles of Environment Canterbury and the City Council are reviewed in order to determine whether overlap in regulation of land use can be reduced.

2. The appropriateness of Waitikiri Drive, parts of Lower Styx Road, and Blue Lagoon Drive/Shammys Place areas remaining zoned Rural 1 is reviewed.
5.4.7 Addendum: Summary of the City Plan for the Coastal Group

<table>
<thead>
<tr>
<th>Objectives</th>
<th>Key Provisions</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Natural Environment Objective</strong></td>
<td>1. Protect conservation values, recreational opportunities and public access.</td>
</tr>
<tr>
<td>Maintenance and enhancement of the quality of natural resources and their ability to meet the needs of present and future generations.</td>
<td>2. Retention of open landscape character</td>
</tr>
<tr>
<td><strong>City Identity Objective</strong></td>
<td>3. Quality of natural habitats, wildlife and ecosystems</td>
</tr>
<tr>
<td>A distinctive city where form, amenity and heritage values are maintained and enhanced.</td>
<td>4. Personal safety and property damage from natural hazards</td>
</tr>
<tr>
<td><strong>Tangata Whenua Objective</strong></td>
<td>5. Stability of coastal environment</td>
</tr>
<tr>
<td>The management of the City’s natural and physical resources, taking into account the principles of the Treaty of Waitangi.</td>
<td>6. Avoid adverse effects on water quality</td>
</tr>
<tr>
<td><strong>Subdivision and Development Objective</strong></td>
<td>7. Recognition of value to Tangata Whenua</td>
</tr>
<tr>
<td>That the values and functioning of natural and physical resources are maintained when the process of land subdivision and/or development takes place, recognising anticipated land use activities.</td>
<td><strong>Zone description and purpose</strong></td>
</tr>
<tr>
<td><strong>Rural Objective</strong></td>
<td>Rural 1 (Coastal) Zone</td>
</tr>
<tr>
<td>The sustained potential of land, soil, water and infrastructural resources in the rural area to support life and to meet reasonably foreseeable future rural and urban needs.</td>
<td>Natural resources are strongly influenced by the coastal environment with soils subject to risk from erosion. Accordingly, forestry activities are encouraged. Bottle Lake Plantation and the Burwood Landfill are important features.</td>
</tr>
<tr>
<td><strong>Recreation and Open Space Objective</strong></td>
<td>Conservation 1A (Coastal margins) Zone</td>
</tr>
<tr>
<td>Quality open space and a range of recreational opportunities in the City.</td>
<td>Recognise and protect areas of significant natural flora and fauna, and within these areas been subject to adverse effects of inappropriate use or development, particularly disturbance of the land surface and of vegetation.</td>
</tr>
<tr>
<td><strong>Specific objectives</strong></td>
<td><strong>Zone AERS</strong></td>
</tr>
<tr>
<td>2.2 Maintenance and enhancement of the quality and availability of the City’s water resources, and of the natural and cultural values and public accessibility of waterways and their margins.</td>
<td>Rural 1 (Coastal) Zone</td>
</tr>
<tr>
<td>2.4 The protection and enhancement of key elements and processes comprising the City’s natural environment.</td>
<td>1. Recognition and protection of the coastal environment</td>
</tr>
<tr>
<td>2.6 Preservation of the natural character of the coast, including coastal processes, habitat, as, and associated amenity and cultural values; and the maintenance of the stability of the coastline consistent with the retention of these values.</td>
<td>2. Protection of the operational requirements of forestry and waste management</td>
</tr>
<tr>
<td>4.1 The maintenance and enhancement of natural and physical features and characteristics contributing to the distinctive form of the City.</td>
<td>3. Recognition of existing residential, recreation or camping activities</td>
</tr>
<tr>
<td>4.2 A pleasant and attractive City</td>
<td>4. Maintenance of predominant visual characteristics</td>
</tr>
<tr>
<td>5.1 To recognise the importance of, and provide for, the relationship of Maori, and their culture and traditions with ancestral lands, water, sites, wahi tapu and other taonga.</td>
<td>5. Soil stability</td>
</tr>
<tr>
<td>10.2 That significant natural features and archaeological sites be recognised and protected at the time of considering applications for, and through the process of, land of subdivision and/or land use development, recognising likely subsequent land use practices.</td>
<td>6. Low density of building and residential activity</td>
</tr>
<tr>
<td>13.1 (a) That the rural land and soil resource be managed to:</td>
<td>Conservation 1A (Coastal margins) Zone</td>
</tr>
<tr>
<td>• enable rural resources to continue to be used for a variety of rural activities while recognising the operational needs and the potential environmental effects of such activities;</td>
<td>1. Integrity, functioning and resilience of coastal margin</td>
</tr>
<tr>
<td>• provide scope for the appropriate establishment or extension of urban activities; and</td>
<td>2. Conservation and enhancement of significant areas</td>
</tr>
<tr>
<td>• retain the stability and character of rural soils, and the life supporting capacity of the</td>
<td>3. Recognition of coastal hazards</td>
</tr>
<tr>
<td></td>
<td>4. Maintenance and enhancement of public access to the coast</td>
</tr>
</tbody>
</table>

Policy areas

1. Esplanade reserves
2. Ecosystems and habitats
3. Natural and amenity values
4. Coastal activities
5. Coastal development
6. Use of the margins
7. Water quality
8. Coastal stability
9. Rocky coastlines and headlands
10. Estuaries, waterways and wetlands
11. Coastal environment
12. Water
13. Traditional resources
14. Natural features and habitats awareness
15. Public space
16. Natural features, ecosystems and archaeological sites
17. Waterway margin access
18. Surface waters
19. Convenience and accessibility
13.2 Management of land use activities to protect the quality and availability of both surface water and ground water on the rural area of the City.

14.1 (a) Open spaces and recreational facilities that are equitably distributed and conveniently located throughout the City.
(b) Diversity in the type and size of open spaces and recreational facilities to meet local, district, regional and nationwide needs.
5.5 Education and Hospitals

5.5.1 Summary

Education and hospitals group relates to those parts of the City Plan which provide for the schools, the tertiary education facilities, and a significant number of public and private hospital facilities. This Group is made up of three different City Plan areas being: Cultural 3 (Schools) Zone; Cultural 4 (Tertiary education) Zone; and Special Purposes (Hospital) Zone. The purpose of these zones is to provide for these activities while controlling their effects on the surrounding environment.

Overall the three zones are effective in providing for these activities, with education and health activities dominating. However, development occurring between 2000 and 2010 has resulted in sites being used for other new land uses.

In all three zones, the ‘overlay’ technique used to control the effects of other unrelated activities occurring within them is practicable. The effectiveness of this technique is reliant on the specification of the appropriate underlying zone. The underlying zoning is appropriate in the context of the wider environment.

From an efficiency perspective, there is evidence that a number of the development and community standards used are resulting in resource consent processes where the effects on the environment are judged to be minor. While this evaluation cannot be definitive as to the degree to which these processes allow the City Plan objectives to be advanced, from the evidence it can be tentatively concluded that in a number of instances these standards may be overly onerous and these thresholds warrant reconsideration.

In relation to the Cultural 3 Zone, this is not effective when the school is designated by the Minister of Education and the development is being undertaken on behalf of the Minister. This is because the Minister has typically used designation powers to provide for the development. However, given this zone applies to other schools for which designation powers are not currently available, addressing this effectiveness issue is not considered as necessary as it would result in differential treatment for similar activities within the City Plan. Further, it does not result in City Plan efficiency issues for the Minister or other parties, including the City Council.

It is recommended that:

1. The need for the Cultural 3 Zone for land which is subject to designations for education purposes is reconsidered in order to reduce the complexity of the City Plan.

2. Consideration is given to enabling the use of school facilities for community-based non-education activities (e.g. neighbourhood churches, meetings of community groups).

3. The purpose of the bulk, location and landscaping provisions, including rules, are reviewed to ensure they are achievable for large scale institutions and to reduce the number of non-notified resource consents, particularly for tertiary education facilities and large hospitals.

4. The zone boundaries are reviewed and updated in locations where a new land use has established that is not anticipated by the current zoning. Examples include: the Cultural 3 Zone at Briggs Road and Chaddeson Lane, and the Special Purposes (Hospital) Zone at Templeton, Sunnnyside and (old) Christchurch’s women’s hospitals.
5.5.2 Introduction

The Education and Hospitals Group relates to those parts of the City Plan which provide for the schools, the tertiary education facilities, and a significant number of public and private hospital facilities (See Figure 14).

This Group is made up of three different City Plan areas, being:

1. Cultural 3 (Schools) Zone. This zone includes public and private primary, intermediate, secondary and composite schools in the City. Within the City Plan it is noted that the Council does not support the continued designation of state schools and considers that this zone makes adequate provision for these schools.

2. Cultural 4 (Tertiary education) Zone. This zone provides for the facilities of University of Canterbury, Christchurch College of Education and Christchurch Polytechnic.

3. Special Purposes (Hospital) Zone. This zone applies to existing facilities and infrastructure associated with hospitals. It covers all the significant public and private hospitals within the City, with 24 individual hospitals being included within it.

The primary City Plan community facilities and identity objective is facilities which meet community needs and enhance opportunities for community participation.\(^{132}\)

In summary, the City Plan seeks the following outcomes for these locations:

1. In the Cultural 3 Zone, the use and development of existing schools, including as multi-purpose facilities, in a manner which reflects the surrounding environment.

2. In the Cultural 4 Zone, the use and development of the statutory education facilities in a manner which reflects the existing environment.

3. In the Special Purpose (Hospital) Zone, the use and development of these hospital facilities in a manner which is compatible with the surrounding environment. With respect to state schools, it also seeks a discontinuation of the use of designation powers by of the Minister of Education.

\(^{132}\) Volume 2, Section 9.
The overall development activity within the education and hospital group falls into one of two categories. The first is that type of development the zones were established to provide for – education (Cultural 3 and 4 zones) and health (Special Purposes (Hospital) Zone). The second is that development which occurs because the provider does not control and/or need some or all of the land zoned for that purpose. The second type of development is controlled by 'underlying' zone rules (i.e. Living 1 Zone) which reflect the surrounding zone pattern. In this circumstance the underlying zone is subject to evaluation in other groups and is not taken further. The evaluation in this group focuses on the type of development the zones are established to provide for, with checks being made that the second group of development is not compromising the purpose of these zones.

The purpose of this evaluation is to consider in detail examples of zones within the City Plan designed to control the adverse effects on the environment of the site specific land uses. There are a number of other zones which fulfil a similar purpose for different facilities. These are largely included in the 'other facilities' group. It is intended that, where relevant, the findings of this evaluation can be applied to these other facilities.

In this section the outcomes from interviews with key City Council staff are recorded, effectiveness and then efficiency is considered, a summary of the key findings and recommendations is provided, and finally an addendum is included summarising the relevant City Plan provisions.

### 5.5.3 Interviews with City Council Staff

We interviewed key staff from plan policy and plan administration. The focus of the interviews centred around three matters:

1. The nature and type of land use activities establishing within the respective groupings.
2. Impact of land use development on the character of neighbourhoods.
3. Workability of parts of the City Plan.

#### 5.5.3.1 Land use activities

Generally activities within this group are establishing in accordance with what is anticipated and expected. Public schools are using their designation powers\(^\text{133}\) to establish a range of educational activities and facilities by way of the outline development plan process. Outline development plans are generally in alignment with the City Plan bulk and location rules, but often not car-parking rules. Having both City Plan rules and designation process applying to public schools is inefficient for them. Where developments comply with City Plan rules, they are required to apply for an outline development plan approval regardless. For private schools, the City Plan rules were necessary as such schools did not have Requiring Authority status.

For Cultural 3 (Schools) Zone, there is increasing use of school facilities for community groups, sport and social club activities occurring outside of school hours. This is seen as a means of generating additional income for schools. Currently the City Plan does not recognise or provide for non-education activities to be undertaken on school sites. Most are occurring without resource consent. The City Plan is ‘out of step’ with changing community demand for facilities. This has resulted in a number of complaints from adjoining residential neighbours regarding hours of operation, noise and traffic movements. This is making increasing demands on Council to investigate and undertake enforcement action. City Plan rules do not adequately manage the changing demand of use of Cultural 3 zoned land.

\(^{133}\) A full discussion on designations is found in the Narrative Group Chapter in the ‘Designations’ section.
For Special Purpose (Hospital), there is increasing pressure and demand for the establishment of specialist elderly care facilities. This is seen as a departure from general hospital care for which the Special Purpose Zone was established to provide.

5.5.3.2 Impact on neighbourhood character

Private schools, tertiary institutions and hospitals, often constrained by land ownership, are focussing on consolidating activities to their respective sites. On the whole, character within the respective sites is being retained. However, increasing demand for facilities and resources has resulted in an intensity of built form and activity perceived to be more intense than what City Plan anticipates. In response to increasing demand for facilities and resources, there is increasing pressure to expand on adjoining living zone properties resulting in the need for resource consent applications. Where written approvals of adjoining affected persons have been obtained, applications are approved as a matter of course. This is the situation for the majority of resource consent applications.

Overall, character and amenity at the interface of education and health facilities with neighbouring residential properties was being maintained primarily due to mitigation measures adopted in resource consent applications such as landscaping, screening and building and colour treatment.

5.5.3.3 City Plan implementation

A number of resource consents sought to reduce landscaping. This did not result in a degrading of street scene or interface with the Living Zone(s). Often such applications are supported with detailed landscaping plans designed to mitigate a reduction in landscaped area. Further, to achieve high level and quality of appearance, schools and institutions have caretakers and/or grounds people on staff thereby ensuring landscaping is maintained to a high standard.

For sites where an activity ceases, the City Plan states the underlying zone shall apply to future uses. This is a satisfactory approach to managing future land uses as it provides clarity and certainty as to future expectations for that site.

5.5.4 Effectiveness

The effectiveness of the City Plan is determined by how well it controls land use in order to achieve and provide for the use and development of these facilities while controlling the adverse effects on the surrounding environment.

5.5.4.1 Cultural 3 Zone

The Cultural 3 Zone provides for the use and development of public and private schools.

As summarised in Figure 15, in 2010 the Council’s rating data-base shows that land use within the Cultural 3 Zone is consistent with the outcomes anticipated for this zone, being education (91%). There is limited evidence from this data-base of these sites being multi-purpose, with only a small amount of land used for related activities such as community (3%) and

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134 St Bedes College, St Georges Hospital, Southern Cross Hospital recently expanded by way of resource consent application.
recreation (1%). However, this is likely an understatement of the multi-use of the education asset of these sites for other purposes.

This is reinforced by the building consent information. Between 2000 and 2010, 183 building consents for non-dwelling activities\textsuperscript{135} were granted. Of these, only four of these do not clearly relate to education activities.

Further, while 57 building consents for 84 new dwellings were approved between 2000 and 2010 within the Cultural 3 Zone, these can be explained on a site-by-site basis. Two sites are no longer used for schools (Briggs Road (24 building consents) and Chaddeson Lane (12 building consents)). For the remainder, building consents relate to land on the fringe of the schools activity\textsuperscript{136} no longer required for school purposes.

For the Cultural 3 Zone, the City Plan rules work as an overlay. Where the development is for education activities, the specific Cultural 3 Zone rules apply. Where the development does not, one of the many other zones in the City Plan apply, depending on that listed in the ‘list of schools’ tables\textsuperscript{137}. In relation to the Cultural 3 Zone specific rules, there are 52 different proposals with non-compliances listed, all of which were granted. Of these, 79% (41) related to the bulk and location rules and 7 (13%) to noise from pre-schools. With respect to the general rules in the City Plan that also apply to education activities, there were 56 transport non-compliances, all of which were granted. Forty seven (84%) relate to education activities, often pre-schools. While there are other resource consent non-compliances that relate to education activities, there is no observable pattern.

From field observations schools are not having a significant effect on the surrounding environment. As schools increase in size, their built form becomes more noticeable in the wider environment, but this is offset by open space. It is not clear whether this offset is a result of the City Plan or Ministry of Education school planning and designation process. Picture 4 is a typical example of a school entrance in a living neighbourhood.

The designation powers were used extensively between 2000 and 2010 to provide for development. From the resource consent data-base it is estimated that outline development plans were lodged, or waivers sought approximately 500 times, and often multiple times as single schools. This is strong indication that where there is a designation in place and the requiring authority (Minister of Education) is undertaking development, the designation powers under the RMA are being used, rather than the Cultural 3 zone provisions. In these circumstances, the Cultural 3 Zone has no direct influence on the land use outcome.

Therefore, overall, the Cultural 3 Zone:

1. Is not effective when the school is designated by the Minster of Education, nor is it effective in discouraging the use of the designation powers held by the Minister.

\textsuperscript{135}activities with an estimated value of $40,000 or greater.

\textsuperscript{136}The main areas are: McClintock Lane (St Thomas), Hei Hei Road (Hornby Primary School), Stoneycroft Lane (St Beradettes Schools), Main North Road (St Bedes College).

\textsuperscript{137}Volume 3, Part 7, Rule 3.6.
2. Is effective when controlling education activities at other schools, though there is evidence that the bulk and location, and transport controls may be overly onus.

3. Is applied in a number of locations which is no longer appropriate, or where the boundaries of the Zone need to be refined to reflect current non-education activity development patterns.

5.5.4.2 Cultural 4 Zone

The purpose of the Cultural 4 Zone is to provide for the use and development of the tertiary education facilities in a manner which reflects the existing environment.

As summarised in Figure 16, in 2010 the Council’s rating data-base shows that land use within the Cultural 4 Zone is consistent with the outcomes anticipated for this zone, being education (96%). This is likely a reflection of the land ownership pattern within the Cultural 4 Zone, being primarily by or on behalf of tertiary institutions.

This is reinforced by the building consent information. Between 2000 and 2010, 20 building consents for non-dwelling activities were granted, all of which relate to tertiary education activities. Further, only two building consents for dwellings occurred in this zone in the same time period.

From the resource consent data-base it can be seen that 30 properties were subject to resource consent process between 2001 and 2010, all of which were granted. Twenty different resource consents were applied for non-compliances with specific Cultural 4 Zone rules relating to tertiary education and research activities. Of these, 10 (50%) relate to the bulk and location rules and eight (40%) to the landscaping rules. In addition, two of these proposals required consent for non-compliances with the transport rules. Finally, a further three tertiary education and research activities required resource consent as a result of transport rules non-compliances.

From field observation, the tertiary facilities include significant buildings and traffic generation. This is appropriate to the institution, but influences the wider environment, and therefore affects the character of that environment. Given the scale of these activities, this will always be the case. The significance of the built form dominance of the activity is dependent on the type of surrounding environment, and for Canterbury University the management of open space and landscaping on its sites. For Canterbury University this reduces its interface impacts. City Council staff confirm these field observations.

Overall, the Cultural 4 Zone is largely effective in providing for the development of tertiary education and research activities. By their character and scale, they cannot reflect the character of any adjoining living areas. This influence can only be managed, not avoided. From an institution view point there is some evidence that bulk and location, and landscaping, rules may be overly onus as consents are being granted for non-compliances. However, this highlights the tension with the
objective relating to reflecting the existing character of the surrounding environment when this is a living environment.

5.5.4.3 Special Purposes (Hospital) Zone

The purpose of the Special Purposes (Hospital) Zone is to provide for the use and development of these hospital facilities in a manner which is compatible with the surrounding environment.

As summarised in Figure 17, in 2010 the Council’s rating data-base shows that land use within the Special Purposes (Hospital) Zone is consistent with the outcomes anticipated for this zone, being health (84%). There are areas other (9%) and residential land (4%), suggesting further development opportunities for hospital purposes within this zone.

This is reinforced by the building consent information. Between 2000 and 2010, 28 building consents for non-dwelling\textsuperscript{139} were granted. Only five of these do not clearly relate to hospital activities, with four relating to education and one to a community centre.

In the same period, 72 building consents for 93 dwellings were granted between 2000 and 2010. However, these are explained by the closure of Sunnyside and (old) Christchurch women’s hospitals. Seventy building consents relate to the Sunnyside site. It is noted that as part of the redevelopment of that site, heritage buildings listed in the City Pan were demolished.

Seventy five different properties in the Special Purposes (Hospital) Zone were subject to resource consent applications between 2000 and 2010. The resource consent data-base records only one consent being refused being in relation to the removal of a protected tree. In addition, Christchurch Hospital was designated for that purpose under the Transitional City Plan and this designation was used up until the point in time when the Transitional District Plan was no longer being implemented. This designation was used a number of times to undertake redevelopment work, including the construction of Christchurch Women’s Hospital.

Non-hospital development is occurring in the Special Purposes (Hospital) Zone. Eighty eight resource consents were granted for non-hospital activities with an estimated value of $40,000 or greater.

\textsuperscript{139}activities with an estimated value of $40,000 or greater
development between 2000 and 2010. Sixty seven of these were treated non-notified, one by way of limited notification and seven by public notification, with the remainder not being specified. Consents are being required for a variety of reasons. In 19 instances, the activity status is recorded as being non-complying.

From the description field in the resource consent data-base, the Special Purpose (Hospital) Zone is being used to meet the widening needs of elderly persons care, ranging from relatively independent accommodation through to full hospital services. Field collaboration supports staff view that this is occurring in some circumstances through expansions onto adjoin living zoned sites. This indicates that the existing zone boundaries may no longer be appropriate in some circumstances.

Field observations shows that the Special Purposes (Hospital) Zones that this zone is providing for two types of hospitals. The fully fledged hospitals of significant built scale\textsuperscript{140}, and the more specialist hospitals with a lower intensity built form\textsuperscript{141}. These two types have very different environmental outcomes. Picture 5 shows an example of a fully-fledged hospital.

It is also noted that Plan Change 23 sought to remove the Special Purposes (Hospital) Zone from the Templeton site. While this was declined because the form of zoning sought, it does not overcome the issue that the zone no longer reflects the land ownership and use.

Overall, the Special Purpose (Hospital) Zone:

1. Is effective when controlling hospital activities, although there is evidence that a number of the development and community standards may be resulting in unnecessary resource consent processes.

2. Is applied at Sunnyside, (old) Christchurch Women’s and Templeton which is no longer appropriate. There may be other sites in a similar position.

3. May need to be expanded to reflect encroachment of Hospital activities onto adjoin site.

5.5.5 Efficiency

The land use consent applications were all granted for those which an outcome is recorded in the resource consent data-base. Table 9 shows that a large majority of resource was processed on a non-notified basis. This indicates those non-compliances were considered (largely during the study period) to have insignificant effects on the environment for the purposes of determining the process the resource consent application was to follow, or the City Plan had already determined that public notification was not required.

<table>
<thead>
<tr>
<th>Process</th>
<th>Outcome</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Cultural 3</td>
</tr>
<tr>
<td>Non notified</td>
<td>21</td>
</tr>
<tr>
<td>Service</td>
<td>2</td>
</tr>
<tr>
<td>Notified</td>
<td>3</td>
</tr>
<tr>
<td>Not known</td>
<td>0</td>
</tr>
</tbody>
</table>

Table 9: Education and Hospital Group Resource Consent Process Count 2000 - 2010\textsuperscript{142}

Due to the influence of the designation data, for this group, the form of the resource consent data-base means we have limited confidence in performing further analysis of the activity status and

\textsuperscript{140} For example, Southern Cross, Christchurch Public, Princess Margaret, St Georges.

\textsuperscript{141} Parklands, Nurse Maud.

\textsuperscript{142} Subdivision consents have largely been excluded from this table.
processes. However, only applications that are recorded as being a non-complying activity were publicly notified. Within this category, more non-complying activities were treated as non-notified applications than publicly notified applications.

In totality between the education and hospital group, the rule thresholds are resulting in a significant number of resource consent applications where the effects on the environment appear to be considered minor in the specific circumstances.

The efficiency of the Cultural 3 Zone is influenced by the Minster of Education’s use of designations. As identified earlier, typically development of those sites was achieved under the designation provisions in RMA, rather than rule framework within the City Plan. The efficiency of this resource management control is determined by the Act, not the City Plan. Therefore, the efficiency of the City Plan in relation to the operation and development of these sites is largely neutral as its rules do not control this form of development.

### 5.5.6 Summary of Effectiveness and Efficiency

The effectiveness and efficiency of City Plan policies, rules, or other methods in achieving its objectives is summarised in Table 10.

<table>
<thead>
<tr>
<th>Objective</th>
<th>Effectiveness</th>
<th>Efficiency</th>
</tr>
</thead>
<tbody>
<tr>
<td>9.1</td>
<td>Low to Medium</td>
<td>Reduced (significant number of resource consents and sites being subject to designation provisions)</td>
</tr>
<tr>
<td>9.2</td>
<td>High</td>
<td>Provision of education and large scale health facilities is achieved.</td>
</tr>
</tbody>
</table>

Table 10: Summary of Effectiveness and Efficiency of the Education and Hospital Group

Resulting from this evaluation, to increase effectiveness and efficiency, we recommend that:

1. The need for the Cultural 3 Zone for land which is subject to designations for education purposes is reconsidered in order to reduce the complexity of the City Plan.

2. Consideration is given to enabling the use of school facilities for community-based non-education activities (e.g. neighbourhood churches, meetings of community groups).

3. The purpose of the bulk, location and landscaping provisions, including rules, are reviewed to ensure they are achievable for large scale institutions and to reduce the number of non-notified resource consents, particularly for tertiary education facilities and large hospitals.

4. The zone boundaries are reviewed and updated in locations where a new land use has established that is not anticipated by the current zoning. Examples include: the Cultural 3 Zone at Briggs Road and Chaddeson Lane, and the Special Purposes (Hospital) Zone at Templeton, Sunnyside and (old) Christchurch’s women’s hospitals.
### 5.5.7 Addendum: Summary of the City Plan for the Education and Hospital Group

<table>
<thead>
<tr>
<th>Objectives</th>
<th>Key Provisions</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Community facilities and identity objective</strong></td>
<td><strong>Key AERS</strong></td>
</tr>
<tr>
<td>Facilities which meet community needs and enhance opportunities for community participation.</td>
<td>1. Metropolitan community facilities principally located within the central city and major suburban centres.</td>
</tr>
<tr>
<td><strong>Specific objective</strong></td>
<td>2. Continued operation and growth of education facilities</td>
</tr>
<tr>
<td>9.1 Provision for accessible community facilities to meet educational, spiritual, health, and other local needs.</td>
<td>3. Maintenance and protection of amenity values</td>
</tr>
<tr>
<td>9.2 The provision of community facilities which serve metropolitan needs for educational, cultural and specialised services.</td>
<td></td>
</tr>
</tbody>
</table>
5.6 Industrial

5.6.1 Summary

The primary focus of the City Plan for the industrial group is to provide for industry, warehousing and service related land uses, with high traffic generation volumes. There is provision for retail, offices and residents. The expected amenity values of the industrial areas reflect the type of land uses and their age. Gradual improvement of the amenity values of older areas is sought, with new areas having high standard of amenity values. Specific focus is provided on the interface of the industrial areas with surrounding, particularly living, zones with the amenity values (e.g. pleasantness, aesthetic coherence) of the surrounding areas to be protected.

The City Plan is effective in maintaining the overall dominance of industry. Warehousing and service related activities are high. Field observations identify that retail activities can dominate in specific locations, particularly in the Business 4 Zone. This is the subject of the now operative Variation 86. This variation continues to provide for new retail activities. There is limited evidence of non-compliances with the City Plan resulting in unanticipated amenity values.

The control of the effects of activities in industrial areas on the surrounding environment, particularly the living environment, is effective. There is no evidence of systemic non-compliances of the key city Plan rules or the activities within these industrial areas are encroaching upon the adjoining zones.

The City Plan is of reduced efficiency as:

1. A high proportion of development is requiring resource consent, which are typically granted on a non-notified basis.

2. Non-compliances with the transport related rules are by far the most common non-compliance resulting in resource consent applications. Given that the City Plan recognises activities in the industrial areas as being high traffic generating, the efficiency of these rules is questionable.

It is recommended that:

1. The amenity values and characteristics of individual business zones be reviewed and clearly defined to provide a clear distinction between different amenity values expected in the business zones, and between industrial areas of different ages.

2. Transport related rules are reviewed to reduce the number of non-notified resource consent applications by better reflecting the traffic environment anticipated in the Industrial areas.

3. Individual rules relating to bulk and location of structures are reviewed to reduce the number of non-notified resource consent applications.

4. Consideration is given to the appropriateness of ‘live and work’ development within the industrial areas to ensure that these areas can effectively be used for industrial activities.

5. Zone boundaries are reviewed and updated to reflect changes in land use that are better managed through an adjoining zone. One example is Westpark at Wairakei Road.
5.6.2 Introduction

The industrial area incorporates the majority of the areas of Christchurch City where industry and service activities are provided for (See Figure 18).

The industrial area is made up of a number of areas zoned in the City Plan for industry and service land uses (see Figure 18). It is made up of the Business 3, 3B, 4, 4P, 4T, 5 and 7 zones\textsuperscript{143}.

The primary City Plan business objective is to provide opportunities for a diverse and prosperous business environment, while avoiding, remedying or mitigating the adverse effects of business activities.\textsuperscript{144} In summary, the City Plan seeks the following outcomes for these locations:

1. The predominant land use is industry, warehousing and service related, with high traffic generating characteristics. There is limited provision for retail, offices and residents.

2. The amenity values reflect the land uses provided for and the age of the areas. With the exception of the Business 4P and 4T zones, the areas provide for high density and scale of development. Gradual improvement of the amenity values of the older areas is sought, with new areas having high standard of amenity values.

3. Specific focus is provided on the interface of the industrial areas with surrounding zones, particularly living, with the amenity values of the surrounding land uses to be protected.

Variation 86 was made operative on 16 November 2009. This variation dealt with the distribution of retail within the City. Consequently, it affects the industrial group, particularly the Business 3B and 4 zones. In short, through this variation more stringent controls on retail activities were introduced into the City Plan in the Business 3B and 4 Zones, while still providing for a level of retailing as a permitted activity.

While this variation was publicly notified in August 2004, it is unlikely to have significantly influenced the implementation of the City Plan until it was beyond challenge in late 2009. Consequently, the information presented below which relates to retail distribution largely evaluates the City Plan before Variation 86, and therefore conclusions on the effectiveness and efficiency of the City Plan in relation to retail distribution must be treated with caution.

\textsuperscript{143}Business 3 (Inner City Industrial), Business 3B (Inner City Industrial Buffer), Business 4 (Suburban Industrial), Business 4P (Suburban Industrial Produce Park), Business 4T (Suburban Industrial Technology Park), Business 5 (General Industrial), Business 6 (Rural Industrial), Business 7 (Wilmer’s Road).

\textsuperscript{144}Volume 2, Section 12.
In this section the context for the evaluation is described, the outcomes from interviews with key City Council staff are recorded, effectiveness and then efficiency is considered, a summary of the key findings and recommendations is provided, and finally an addendum is included summarising the relevant City Plan provisions.

5.6.3 Context for the Evaluation

An overview of the contextual information relating to the suburban living area is provided in Table 11.

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>No.</td>
<td>%</td>
<td>No.</td>
</tr>
<tr>
<td>North west</td>
<td>94</td>
<td>9</td>
<td>53</td>
</tr>
<tr>
<td>North east</td>
<td>25</td>
<td>3</td>
<td>1</td>
</tr>
<tr>
<td>South east</td>
<td>148</td>
<td>15</td>
<td>1</td>
</tr>
<tr>
<td>South west</td>
<td>495</td>
<td>50</td>
<td>2</td>
</tr>
<tr>
<td>Port Hills</td>
<td>65</td>
<td>6</td>
<td>0</td>
</tr>
<tr>
<td>Inner city</td>
<td>170</td>
<td>17</td>
<td>1</td>
</tr>
<tr>
<td>TOTAL</td>
<td>997</td>
<td>100</td>
<td>58</td>
</tr>
</tbody>
</table>

Table 11: Contextual Information for the Industrial Group

From this table it is observed:

1. Non-residential development activity occurred within the industrial areas, with half of this activity being concentrated in the south west, followed by lower levels of activity in the south east and inner city.

2. Overall, there are low levels of new dwellings being consented. The anomalous result is that 53 dwellings (91%) were located in the north-west.

3. The pattern of resource consents largely followed that of the non-residential building consents, except for a higher proportion of consents occurred in the inner city and a lower proportion in the south west than would be predicted.

4. The overall number of resource consents is higher than would be expected from the building consent record. This may be explained by; the selection of the $40,000 building value threshold, land use changes not requiring building consent (i.e. within existing structures) and that lower values developments requiring resource consent.

Industrial land is constantly being developed within the City (see Figure 19). On average 22 hectare of industrial land is developed per year (2000 to 2009) with the rate of development ranging from 7 ha (2009) to 31 ha (2009). As of June 2009, there was 300 ha of vacant industrial land, with significant areas being located in Islington, Hornby, Wigram, and Chaney's.

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145 The number are likely to represent an under count as in some instances a building consent provides for multiple dwellings.
146 The number are likely to represent an under count as in some instances a building consent provides for multiple dwellings.
In the period 2000 to 2010, a further 86 ha of new industrial zoned land was included in the City Plan in three locations\textsuperscript{149}, and a further 24 ha changed its form of industrial zone at two locations. To place this in context, in 2001 there was approximately 2100 ha of land in the industrial group.

5.6.4 Interviews with City Council Staff

We interviewed key staff from plan policy and plan administration. The focus of the interviews centred around four matters:

1. The effect of non-industrial activities on the objective of providing for industry, warehousing and services related land uses, with high traffic generating characteristics.
2. Changes in industrial character.
3. The interface between the industrial areas and surrounding living areas.
4. Workability of parts of the City Plan.

5.6.4.1 Activity

With regards to non-industrial activities, decisions to Variation 86 to the City Plan enabled the opportunity for a range of non-industrial activities to establish. In particular, the establishment of stand-alone retail activity and residential apartment type activity generally located above an ’industrial’ unit being prominent development. An example of residential activity establishing in the industrial area is the Ferrymead Towers for apartment living in the Business 4 Zone. While the City Plan anticipates and provides for limited residential activity in industrial areas, insufficient provision is made for reverse sensitivity effects on residential properties from industrial activities.

There remains concern that Variation 86 will not result in sufficient limitation of retail in the Industrial areas. Retail activities are still provided for, subject to meeting different floor area thresholds. This threshold approach is unlikely to be effective.

There is increasing ‘blurring’ between commercial activities and industrial activities within the Industrial Group. The City Plan does not provide adequate guidance or clarity of definition as to what are ‘appropriate’ industrial activities. For example; the relationship between storage of material, wholesale display and showrooms. While being quite different and distinct activities they are currently defined as ‘industrial activity’\textsuperscript{150} in the City Plan. This can result in enforcement and plan administration difficulties and inconsistency.

While Variation 86 went some way to addressing concerns regarding the development of stand-alone retail activity and clarification around activities, it has not effectively stopped the development of

\textsuperscript{149} Two of which were zoned ‘special purpose’.

\textsuperscript{150} Industrial Activity means the manufacturing, assembly, packaging, wholesaling or storage of products or the processing of raw materials and other ancillary activities.
retail activity in the Industrial area. There is little pressure for non-industrial development in the older, established industrial zones (B3, B3B, and B5) but significant pressure for non-industrial development in newer or unique industrial zones such as the Business 4, 4T and 4P Zones.

5.6.4.2 **Industrial character and amenity**

Anticipated industrial character remained relatively unchanged or static in older, established Industrial areas (B3, B5, B6 Zones) having larger sites, large and/or single buildings, areas designated for storage of raw materials, single tenancy centred on manufacturing. However, the character associated with newer or unique industrial zones (B4, 4T and 4P Zones) appears to be shifting. Factors contributing to the character shift centre on the provision of large car parking areas, outdoor advertising, multiple tenants in multiple buildings, and increasing number of smaller tenancies. This has resulted in a character change different to that anticipated for industrial zones being a change primarily from the manufacturing, assembly, and packaging in favour of office, retail, display and service related activities.

5.6.4.3 **Interface**

Aside from the newly introduced rules associated with Variation 86, the bulk and location rules are viewed as being tested, tried and proven. City Plan rules seeking to protect amenity values are generally complied with, particularly when new buildings or business activities establish. However, over time, due to poor on-site maintenance and management, amenity values associated with an industrial site deteriorate resulting in significantly eroded environmental outcomes. This is an enforcement and plan monitoring issue rather than a City Plan rule efficiency or effectiveness issue.

There is no pressure for industrial activities to ‘spill over’ or expand onto residential land. This is due to the availability and supply of industrial land in the City.

5.6.4.4 **City Plan implementation**

The bulk and location rules are appropriate to achieving the outcomes anticipated in industrial areas. City Plan rules are viewed as being liberal and permissive. The majority of bulk and location rules are development or community standards with few critical standards. Where resource consents are required, the combination of permissive approach and activity status results in applications being processed on a non-notified basis.

Some ‘fine tuning’ to existing rules would improve their effectiveness including: outdoor storage, requirement for landscaping, outdoor advertising and traffic related non-compliances. For outdoor storage, landscaping and outdoor advertising, monitoring their compliance and enforcement was seen as being problematic. The definition of what is appropriate landscaping is poorly defined. With regards to traffic related non-compliances (car parking and traffic generation) there is a disconnection between the current car parking requirements and the expectation that activities in industrial zones generate higher traffic volumes. Some traffic related rules are overly detailed and pedantic. There is an inconsistency between the Building Act and the City Plan regarding the provision of disabled car parking. Current transport rules are not properly directed towards the needs of the Industrial Zones.

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151 Rule 5.2.6 – Visual Amenity, Rule 5.2.7 – Landscape Area.
5.6.5 Effectiveness

The effectiveness of the City Plan is determined by how well it controls development in order to achieve land use, amenity value and interface outcomes.

5.6.5.1 Activity

Within the industrial area the predominant land use anticipated within the City Plan is related to industrial, warehousing and service. Retail and offices are typically only anticipated if they are of a moderate scale. Residences are only anticipated if they are ancillary to the predominant land use on a site.

Table 12 summarises the land use information in 2010 from the Council’s rating data-base. This provides an indication to the existing pattern of land uses within the industrial group. Industrial land is dominant. However, there is a significant component of offices, retail and residential land uses. With the exception of the Industrial 6 and 7 zones, these are located within all the industrial zones, and throughout the City.

With respect those building consents entered as new dwellings\(^{152}\), the building consent data-base shows a different picture, with only 58 dwellings being consented between 2000 and 2010, and of these 53 are located in the north west of the City. A large proportion of these consents were granted in the 2007 and 2008 period.

However, this is an anomalous result being a residential subdivision of land zoned Business 4 that adjoins existing residential development on three sides.\(^{153}\) This is supported by the resource consent data. The three key non-compliance categories relating of offices, retail and residential all have very few entries\(^{154}\).

Field observations show the residential building consent data can be explained by one development, being Westpark located at Wairakei Road. It is also noted that examples of ‘live and

<table>
<thead>
<tr>
<th>Land Use</th>
<th>Area (ha) (rounded)</th>
<th>No. of properties</th>
</tr>
</thead>
<tbody>
<tr>
<td>Industrial</td>
<td>1485</td>
<td>5870</td>
</tr>
<tr>
<td>Offices</td>
<td>37</td>
<td>343</td>
</tr>
<tr>
<td>Retail (All)</td>
<td>27</td>
<td>145</td>
</tr>
<tr>
<td>Other commercial (motor vehicle sales etc)</td>
<td>52</td>
<td>252</td>
</tr>
<tr>
<td>Residential</td>
<td>30</td>
<td>263</td>
</tr>
<tr>
<td>Largely vacant, unimproved or improved for some residential</td>
<td>97</td>
<td>395</td>
</tr>
<tr>
<td>Remainder</td>
<td>92</td>
<td>104</td>
</tr>
</tbody>
</table>

Table 12: Land Use in the Industrial Group

\(^{152}\) Noting that in a number of instances dwellings ancillary to other activities are including in the explanation of a building consent that is coded for other than dwellings.

\(^{153}\) Westpark Subdivision, Wairakei Road.

\(^{154}\) BUOFF, BURET, BURES.

\(^{155}\) 23, 35 and 10 respectively, all of which were granted.
work\textsuperscript{156} industrial units were observed, which were not accounted for in the data, such as at Acheron Drive (See Picture 6). It is well recognised that land use activities with environmental expectations that are incompatible with industrial areas can limit the use of those areas for industrial activities.

The resource consent data does not account for the observable pattern of retail development which is occurring in the industrial areas of the City. Two examples are Blenheim Road and Ferry Road Business 4 Zones. Picture 7 shows a typical example of the retail orientated development which has occurred. These areas have the same characteristics as those found in the Suburban Commercial areas. This brings into question the effectiveness of the current zone at these locations.

The explanation of this situation is the permissive and liberal manner in which the City Plan rules for retail were framed. Prior to Variation 86, retail activities and ancillary products could establish as of right provided they were an approved listed activity\textsuperscript{157} or on a site used to produce, process or store goods, comprised of up to 20\% net floor area.

Finally, the City Plan expects that the land uses in the industrial area will be high traffic generators. To a large extent this is reflected in the resource consent data-base, with 57\% (~1700) of the listed non-compliances relating to traffic matters. Of these approximately 1 in 5 (370) relates to the key traffic generation rule in the City Plan\textsuperscript{158}.

5.6.5.2 \textbf{Character and amenity values}

Within the industrial area development is anticipated to be of high density and scale. Two different approaches to amenity values are found in the City Plan. For those areas which are long standing industrial locations, amenity values are to gradually improve. For the more recent industrial areas a high standard of amenity values is expected.

The primary City Plan control of amenity values is in the form of rules controlling site density, open space, street scene, separation, recession planes, visual amenity and landscaping. Of these only landscaping (14\% or 406 non-compliances) and street scene (6\%}

\textsuperscript{156} Typically, industrial floor space at ground level and residential living space on the first floor.
\textsuperscript{157} 30 activities were listed.
\textsuperscript{158} Volume 3, Part 13, Rule 2.3.8
or 164 non-compliances) form a meaningful proportion of the listed non-compliances in the resource consent data-base. No resource consents for any of these amenity value non-compliances are listed in the resource consent data-base as being refused.

Our field observations indicate that the amenity values associated with long standing industrial locations remains unchanged with little sign of improvement (see Picture 8). The lack of landscaping is more noticeable by its absence within this group. This is reflective of minimal development and redevelopment occurring in these zones. More recent industrial areas, in particular the B4T and B4P Zones show a markedly higher standard of amenity, in particular the provision of landscaping toward the road frontage. Picture 9 is a typical example of a development in the B4T Zone.

We note the staff’s view that the amenity values of the industrial areas are changing, particularly when new areas are established. On 15 May 2010 the City Council notified a plan change\textsuperscript{159} to an area of Business 7 land which included a specific design and amenity rule requiring resource consent be obtained by all new buildings and additions to existing buildings with the Council’s discretion limited to design and amenity of the site and development. The section 32 report associated with this change suggests this is to \textit{achieve a better quality environment and higher amenity values than in other existing Business 7 Zones in the city}.\textsuperscript{160} From this it is understood that the Council is concerned with effectiveness of the amenity value controls in the City Plan, at least in relation to the Business 7 Zone. Council staff are currently investigating urban design and appearance options to achieve quality design outcomes in the range of zones across the Central City (within the Four Avenues) and Business 2 Zones. It is anticipated this investigation work will form part of a future plan change\textsuperscript{161}.

Overall, while the City Plan does anticipate new areas will have a higher standard of amenity values, based on the field collaboration, we are not clear that the type of amenity values resulting are consistent with the overall purpose of these zones, being closer to those expected from a more commercially orientated environment. The City Plan would benefit from being clearer on the distinction between the different amenity values expected in the business zones.

5.6.5.3 Interface

The City Plan specifically controls the interface between industrial zones and Living Zones. While this interface is partly managed through the location of specific zones – by using the Business 4 Zone as a buffer between the Business 5 and living zones – there are specific separation and recession plane rules.

\textsuperscript{159} Plan Change 5.
\textsuperscript{160} \url{http://resources.ccc.govt.nz/files/PlanChange5-Notification-Section32assessmentfinal.pdf}, pages 26 and 27.
\textsuperscript{161} Plan Change 56 - Central City and Business 2 Zones – Urban design.
With respect to these two matters the resource consent data-base shows 39 and 17 non-compliances respectively, each representing less than 1% of the total listed non-compliances. All the non-compliances were granted. There is no obvious development type, location or zone pattern in relation to the non-compliance suggesting an effectiveness issue.

In order to understand whether industrial activities were encroaching into areas adjoining the business zones, the resource consent non-compliances within a 50m buffer of the industrial zones were considered. There is no significant evidence of land uses better suited to the industrial areas 'spilling out' into the adjoining zones. Our field observations confirm the above data.

5.6.6 Efficiency

Between 2000 and 2010 there were approximately 1000 building consents for non-residential building in excess of $40,000 and new dwellings. This compares with 1700 properties subject to resources consents in this period. While these numbers are not strictly comparable, they indicate that a significant proportion of development is requiring resource consent.

From Table 13, 44% (1695) of the non-compliances relate to the transport rules in the City Plan. Of these, closer scrutiny shows that approximately one third of these relate to car-parking non-compliances (disabilities, location, number and gradient), one in five to the traffic generation thresholds, and one tenth relate to access, one tenth to queuing space and one tenth to cycle parking.

This number of resource consents in relation to the transport rules appears high. The predominately land uses in the industrial areas are transport related, so it is expected that transport effects will be part of these environments. The non-compliances were typically granted on a non-notified basis (See Table 14). Therefore, it is probable that the transport rule thresholds are too stringent for the industrial areas, suggesting the rules are not efficient.

<table>
<thead>
<tr>
<th>Rules</th>
<th>TOTAL</th>
</tr>
</thead>
<tbody>
<tr>
<td>Business</td>
<td>805</td>
</tr>
<tr>
<td>Transport</td>
<td>1695</td>
</tr>
<tr>
<td>Heritage &amp; amenity</td>
<td>180</td>
</tr>
<tr>
<td>Health and Safety</td>
<td>69</td>
</tr>
<tr>
<td>Waterways</td>
<td>110</td>
</tr>
<tr>
<td>Other</td>
<td>134</td>
</tr>
<tr>
<td>Unknown</td>
<td>903</td>
</tr>
</tbody>
</table>

Table 13: Non-compliance areas for the Industrial Group

This number of resource consents in relation to the transport rules appears high. The predominately land uses in the industrial areas are transport related, so it is expected that transport effects will be part of these environments. The non-compliances were typically granted on a non-notified basis (See Table 14). Therefore, it is probable that the transport rule thresholds are too stringent for the industrial areas, suggesting the rules are not efficient.

<table>
<thead>
<tr>
<th>Process</th>
<th>Granted</th>
<th>Declined</th>
<th>Not known</th>
<th>TOTAL</th>
</tr>
</thead>
<tbody>
<tr>
<td>Non notified</td>
<td>3693</td>
<td>2</td>
<td>21</td>
<td>3716</td>
</tr>
<tr>
<td>Notified</td>
<td>14</td>
<td>4</td>
<td>0</td>
<td>18</td>
</tr>
<tr>
<td>Not known</td>
<td>60</td>
<td>0</td>
<td>52</td>
<td>112</td>
</tr>
<tr>
<td>Total</td>
<td>3787</td>
<td>6</td>
<td>73</td>
<td>3866</td>
</tr>
</tbody>
</table>

Table 14: Industrial Group Resource Consent Non-compliance by Process by Outcome 2000 - 2010

The resource consent process used and the outcome of that process are also indicators of efficiency. Table 15 summarises this for all resource consent non-compliances across the Industrial Group.

---

162 Using Resource Consent Non-compliance codes relating to transport and non-residential activities are indicators.
163 The totals in this table do not match the totals in the previous table due to the way the data is managed. This does not affect the conclusions drawn.
164 Subdivision consents have largely been excluded from this table.
The non-notified row is significant suggesting the rule thresholds may be too stringent. This is further discussion in the chapter on 'Efficiency at the City Plan Level'. Of the notified/declined cell, 3 of these relate to proposed retail developments.

Given this, it is not surprising that Table 15 does not show any process differentiation between the different standards (development, community and critical) in the City Plan. However, what it does demonstrate is that applicants choose to breach the development and community standards more frequently than the critical standards.

<table>
<thead>
<tr>
<th></th>
<th>Controlled</th>
<th>Limited discretionary</th>
<th>Discretionary</th>
<th>Non complying</th>
<th>Unknown</th>
</tr>
</thead>
<tbody>
<tr>
<td>Non notified</td>
<td>438</td>
<td>2282</td>
<td>577</td>
<td>358</td>
<td>32</td>
</tr>
<tr>
<td>Service</td>
<td>-</td>
<td>0</td>
<td>18</td>
<td>2</td>
<td>0</td>
</tr>
<tr>
<td>Notified</td>
<td>-</td>
<td>5</td>
<td>4</td>
<td>8</td>
<td>0</td>
</tr>
<tr>
<td>Unknown</td>
<td>-</td>
<td>37</td>
<td>38</td>
<td>14</td>
<td>19</td>
</tr>
<tr>
<td>TOTAL</td>
<td>438</td>
<td>2324</td>
<td>637</td>
<td>382</td>
<td>51</td>
</tr>
</tbody>
</table>

Table 15: Industrial group resource consent activity status by process count 2000 - 2010

Overall, from the data it can be observed that a significant proportion of the resource consents required were for matters other than to manage meaningful adverse effects on the environment. This draws into question these rule thresholds.

5.6.7 Summary of Effectiveness and Efficiency

The effectiveness and efficiency of City Plan policies, rules, or other methods in achieving its objectives is summarised in Table 16.

<table>
<thead>
<tr>
<th>Objective</th>
<th>Effectiveness</th>
<th>Efficiency</th>
</tr>
</thead>
<tbody>
<tr>
<td>4.4 Outdoor advertising</td>
<td>Medium/High</td>
<td>Signs becoming more prevalent in the industrial environment, particularly at the interface with residential areas and viewed from public places. Reduced (Limited pressure for land use change however significant number of resource consent applications, particularly regarding traffic matters)</td>
</tr>
<tr>
<td>12.1 Distribution of Business Activity</td>
<td>Medium</td>
<td>Industrial activities are distributed throughout the City meeting community needs. However, significant areas of retail activities are also occurring in industrial locations.</td>
</tr>
<tr>
<td>12.10 Role of Industrial Areas</td>
<td>Medium/High</td>
<td>While an overall dominance of industrial activity in industrial areas persists, there is a notable prominence of retail activity in some locations</td>
</tr>
<tr>
<td>12.11 Amenity and effects of Industrial Areas</td>
<td>Medium</td>
<td>City Plan had limited effect at improving visual amenity and street environment.</td>
</tr>
</tbody>
</table>

Table 16: Summary of Effectiveness and Efficiency of the Industrial Group

165 Subdivision consents have largely been excluded from this table.
Resulting from this evaluation, to increase effectiveness and efficiency, we recommend that:

1. The amenity values and characteristics of individual business zones be reviewed and clearly defined to provide a clear distinction between different amenity values expected in the business zones, and between industrial areas of different ages.

2. Transport related rules are reviewed to reduce the number of non-notified resource consent applications by better reflecting the traffic environment anticipated in the Industrial areas.

3. Individual rules relating to bulk and location of structures are reviewed to reduce the number of non-notified resource consents.

4. Consideration is given to the appropriateness of ‘live and work’ development within the industrial areas to ensure that these areas can effectively be used for industrial activities.

5. Zone boundaries are reviewed and updated to reflect changes in land use that are better managed through an adjoining zone. One example is Westpark at Wairakei Road.
## 5.6.8 Addendum: Summary of the City Plan for the Industrial Group

<table>
<thead>
<tr>
<th>Key Provisions</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>City identity objective</strong></td>
<td>A distinctive city we formed, amenity and heritage values are maintained and enhanced.</td>
</tr>
<tr>
<td><strong>Business Objective</strong></td>
<td>A distribution, and diverse range, of business environments which meet the social and economic needs of the wider community, while avoiding, remedying or mitigating the potential adverse effects of their activities within the immediate area, and on the broader surrounding environment.</td>
</tr>
<tr>
<td><strong>Specific objectives</strong></td>
<td></td>
</tr>
<tr>
<td>4.4 The provision for outdoor advertisements, whether temporary or otherwise, that does not detract from amenity values, does not have a detrimental impact upon natural and built heritage values, nor cause potential danger to public safety.</td>
<td></td>
</tr>
<tr>
<td>12.1 A distribution, scale and form of business activity which meets the economic needs of businesses, provides the community with convenient access to goods, services and opportunities for social interaction, and which:</td>
<td></td>
</tr>
<tr>
<td>(a) is able to be efficiently serviced by infrastructure, including water, effluent disposal and roading;</td>
<td></td>
</tr>
<tr>
<td>(b) encourages in appropriate circumstances:</td>
<td></td>
</tr>
<tr>
<td>• co-location of community services and facilities within the central city and district centres;</td>
<td></td>
</tr>
<tr>
<td>• consolidation of residential development around selected consolidation focal points;</td>
<td></td>
</tr>
<tr>
<td>• accessibility, by a variety of modes of transport, to centres providing a wide range of public and private services and facilities; and</td>
<td></td>
</tr>
<tr>
<td>(c) manages the adverse effects of business activities on the environment, including:</td>
<td></td>
</tr>
<tr>
<td>• maintaining or improving the safety and efficiency of the road network and related systems for all users (including public transport, pedestrians and cyclists), and minimising unnecessary trip generation;</td>
<td></td>
</tr>
<tr>
<td>• maintaining the amenity of residential and other sensitive environments (including local roads);</td>
<td></td>
</tr>
<tr>
<td>• ensuring the function, vitality and amenity of those existing centres that provide a wide range of public and private services and facilities to the community will not be significantly affected by new retail activity; and</td>
<td></td>
</tr>
<tr>
<td>• minimising contamination, pollution, odour, hazardous substances, noise and glare.</td>
<td></td>
</tr>
<tr>
<td>12.10 A wide range of industrial areas which accommodate a diversity of appropriate business activities, where adverse effects are avoided, remedied or mitigated.</td>
<td></td>
</tr>
<tr>
<td>12.11 A standard of amenity in industrial areas recognising their location and function, whilst avoiding, remedying or mitigating the adverse effects resulting from activity and development in these areas.</td>
<td></td>
</tr>
</tbody>
</table>

| **Key AERS** |  |
| 1. Location of industrial areas sensitive of surrounding living environments in relation to amenity. |  |
| 2. A wide range of industrial and service activities |  |
| 3. Limitation on retail and residential activities |  |
| 4. High standards of visual amenity within new industrial areas and gradual improvement in older areas |  |
| 5. Avoidance of nuisance |  |
| 6. Effective outdoor advertising that maintains amenity values and avoids adverse cumulative effects |  |

### Zone description and purpose

| Business 3 | Covers older industrial areas near the central city dominated by light industry, warehousing, service industries and includes range of long established industries on small sites. Purpose is to maintain existing industrial employment opportunities while progressively enhancing amenity standards. |
| Business 3B | Provision of a transitional buffer between B3 Zone and medium density inner city housing areas. Activities include small-scale light manufacturing, service and repair industry, warehousing and various community activities. |
| Business 4 | Covers light industrial and servicing areas generally adjoining suburban living areas. Intended to serve as buffer zone between the Living zones and B5. Purpose is to provide for light industry, warehousing and service industries, and some commercial activities such as offices. Retailing is restricted. |
| Business 4P and 4T | Historically established Industrial Park having low density and emphasis on open space and landscape treatment will stop further development for business and industrial purposes. |
| Business 5 | Characterized by wide range of light and heavy industry, processing and warehousing. A lower level of environmental outcomes is anticipated in reflection of its location and character. |
| Business 6 | Zone applies to 2 large areas of land in rural locations. Zone is considered suitable for space extensive “dry” industries which would be constrained in a normal suburban industrial setting and incompatible with any surrounding residential activities. |
| Business 7 | Characteristic of a rural industrial area, with the potential for further development for business and industrial purposes. Land uses and subdivision is considered suitable for space intensive, high effects, “dry” industries. However, development is limited due to a number of constraints. |
### Policy areas
1. Management of the business activity
2. Distribution of commercial activity
3. Distribution of industrial activity
4. Cumulative effects of commercial activity
5. A range of activities
6. Residential activities
7. Amenity improvement
8. Environmental constraints
9. Adverse effects
10. Rezoning
11. Buffers
12. High amenity industrial areas
13. Amenity values
14. Traffic safety and health

### Zone AERS

#### Business 3
1. Diverse range of industrial and service activities
2. Visual dominance of built environment
3. A range of industrial and service activities
4. High-density and scale of buildings
5. High levels of traffic generation
6. Visually mixed environment with predominantly industrial character
7. Limited residential occupation
8. Limited retail activity
9. Limited office activities.

#### Business 3B
1. High density of small scale buildings on small sites
2. High levels of traffic generation
3. Landscaping along road frontages
4. Lower noise levels at boundary of a Living zones
5. Adverse effects controlled at the boundary of Living zones

#### Business 4
1. Diverse range of light industrial activities
2. High density and scale of industrial buildings
3. High levels of traffic generation
4. Noise outcomes limited at Living zone boundaries
5. Visually mixed environment with predominantly industrial character
6. Offices or residential accommodation on site frontages
7. Residential occupation confined to on site management or security

#### Business 4P and 4T
1. Development of a park like setting with extensive landscaping and visual amenity
2. Low density open appearance with limited site coverage
3. Street scene characterized by a large setbacks

#### Business 5
1. Diverse range of industrial and service activities
2. High building density and scale and large outdoor storage areas
3. High levels of light and heavy vehicle generation
4. High levels of noise outcomes
5. Distinctly industrial visual environment dominated by buildings and storage
6. Provision for gradual and permanent and enhancement of street scene character
7. Residential occupation confined to on site management or security
8. Storage and use of hazardous substances
9. Retailing activity limited

#### Business 6
1. Low building density and scale and large outdoor storage areas
2. Significant levels of traffic generation particularly heavy vehicles
3. Improved standards of visual amenity
4. Residential occupation confined to on site management or security
5. Limitations on discharges of trade waste and storage and handling of hazardous substances
6. Retailing activity limited

#### Business 7
1. A range of compatible industrial and service activities
2. Low densities of scale and building development
3. Frontage landscaping and increased setbacks
4. No residential activities
5. Limitations on discharge of trade wastes
6. Limitation on storage and handling of hazardous substances
7. High levels of noise outcomes.
5.7 Open Space and Recreation

5.7.1 Summary

Open space and recreation group consists of the Conservation 2 (Historic and garden city parks), Conservation 4 (Cemeteries), Open Space 1 (Neighbourhood Recreation and Open Space), Open Space 2 (District Recreation and Open Space) and Open Space 3A (McLeans Island) zones. The City Plan seeks the use and development of these parks and other recreational areas to provide open space and recreational opportunities within the City which reflects the role of this land within the City as park network and the presence of historic, botanical and other community values.

Since the City Plan became operative, the provision of new growth-related regional, gardens and heritage, sports and neighbourhood parks is now subject to the Council's Public Open Space Strategy 2010 to 2040 and Development Contribution Policy 2009 - 2019. As a result, the City Plan is no longer the instrument which determines the provision, distribution and diversity of new growth-related open space and recreation areas. Therefore, in this regard, the City Plan policies and methods are outdated and not effective.

Except for isolated areas associated with Johns/Wilkinsons roads (Conservation 4 Zone) and Ben Rarere Avenue in Wainoni Park (Open Space 2 Zone), the provisions of the City Plan are effective in managing the use and development of parks and other recreational areas for the purposes anticipated.

The rules triggers are resulting in a significant number of resource consent applications where the effects on the environment appear to be considered as minor in the specific circumstances, and for land use activities that one would expect to occur within the individual zones. As a consequence, it is possible that fine tuning the different rule thresholds may increase the efficiency of the City Plan.

It is recommended that:

1. Given the Council's Public Open Space Strategy 2010 to 2040 and Development Contribution Policy 2009 - 2019, the role of the City Plan in determining the provision, distribution and diversity of public open space and recreational areas resulting from changes in subdivision and land use is reconsidered, and the relevant policies and methods in the City Plan are reviewed and amended accordingly.

2. The zone boundaries are reviewed and updated to reflect changes in land use, including at Johns/Wilkinsons roads (Conservation 4 Zone) and Ben Rarere Avenue in Wainoni Park (Open Space 2 Zone).

3. The triggers associated with individual rules are reviewed to reduce the number of non-notified resource consents.

4. The Council investigate opportunities to reduce the number of resource consent applications largely required of itself by permitting the undertaking works and activities identified and which accord with the Reserves Act processes such as Reserve Management Plan.

5.7.2 Introduction

The Open Space and Recreation Group relates to those parts of the City Plan which provide for most of the parks and reserves in the City set aside primarily for recreation. They include areas where public use or organised recreation is the predominant activity, in contrast to land in conservation zones where natural or heritage values are predominant (see Figure 20).
This Group is made up of five different City Plan areas, being:

1. Conservation 2 (Historic and garden city parks) Zone. This zone incorporates the parks within the City which have historic structures and buildings or other importance scenic, educational, recreational and botanical values.

2. Conservation 4 (Cemeteries) Zone. This zone covers the cemeteries within the City, including crematoria and memorial gardens.

3. Open Space 1 (Neighbourhood Recreation and Open Space) Zone. Within this zone are neighbourhood parks.

4. Open Space 2 (District Recreation and Open Space) Zone. Within this zone are parks of a size that they provide for district recreation and open space, and include substantial recreation resources such as clubrooms, changing sheds and toilet facilities.

5. Open Space 3A (McLeans Island) Zone. This zone covers land owned by Environment Canterbury associated with the Waimakariri River.

The primary City Plan Recreation and Open Space Objective is to provide quality open space and a range of recreational opportunities in the City.

In summary, the City Plan seeks the following outcomes for these locations:

1. In the Conservation 2 Zone, the use, protection and development of the heritage, landscape, botanical, spiritual and recreational values of these parks.

2. In the Conservation 4 Zone, the provision of cemeteries to meet the community’s needs, their maintenance, and the recognition and protection of their cultural and heritage values.

3. In the Open Space 1 Zone, the provision of a network of small neighbourhood parks providing amenity, recreation opportunity and open space values, and enhancement of these values.

4. In Open Space 2 Zone, the provision of a network of district parks providing significant recreation opportunities enhancement of these opportunities.

5. In the Open Space 3A Zone, the development and use of the land at McLeans Island for a wider range of recreational purposes.
In summary, the City Plan seeks the use and development of these parks and other recreational areas to provide open space and recreational opportunities within the City which reflects the role of this land within the City is park network and the presence of historic, botanical and other community values.

The City Council has adopted its *Public Open Space Strategy 2010 to 2040*. This strategy sets out matters relating to the strategy for, quantum of, and location of new growth-related regional, gardens and heritage, sports and neighbourhood parks that will be required over this time period.

In this section the outcomes from interviews with key City Council staff are recorded, effectiveness and then efficiency is considered, a summary of the key findings and recommendations is provided, and finally an addendum is included summarising the relevant City Plan provisions.

### 5.7.3 Interviews with City Council Staff

We interviewed key staff from plan policy and plan administration. The focus of the interviews centred around two matters:

1. The extent to which non-open space/recreational activities are occurring and how this impacts upon character and amenity.

2. Workability of parts of the City Plan.

#### 5.7.3.1 Land use activities

Development and activities occurring within these areas are generally those expected and anticipated. Council ownership of the majority of the land is the primary reason for this. As a result, open space areas retain their open space characteristics, accessibility and use by the public and the continued use and enjoyment of buildings and facilities provided. Two examples\(^{166}\) of land being developed for residential purposes were noted. These are viewed as unique situations – one being a land swap and the other being surplus land. Overall, the City Plan is achieving the outcomes sought for this group.

#### 5.7.3.2 City Plan implementation

Overall the bulk and location rules are considered appropriate to achieving the outcomes anticipated. However, some 'fine tuning' to existing rules will improve their overall effectiveness, in particular the site coverage and impervious surface rules. As currently worded, any development having a building component will require resource consent. Activities\(^{167}\) generally anticipated and expected to establish in open space areas require resource consent applications. While such activities can be included and provided for through the Reserves Management Plan process, many of Council’s Reserves Management Plans have not been adopted under the Reserves Act or are out of date and in need of review. However, there is an opportunity to improve the relationship between the Reserves Act, the Reserve Management Plan process and land management controls in the City Plan. Currently, development on open space areas is controlled by way of resource consent application, as opposed to through a Reserves Management Plan process. This is considered the more expedient of the two processes available. More works and activities could be undertaken at the Management Plan level to reduce the number of resource consent applications.

Open space areas and road reserves are increasingly used for locating utilities. There is currently a Council policy to enable the establishment of telecommunication transmission facilities on Council owned reserves and road reserves. While applications for telecommunication facilities were generally

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\(^{166}\) Ben Rarere St – Open Space 2, Wilkinson Road – Conservation 4.

\(^{167}\) Public toilets, information kiosk.
looked upon favourably, it does give Council staff the opportunity to ensure some mitigation measures are put in place to minimise their potential adverse effects.

The number of applications for the pruning of protected trees on Council reserves is notable. Such applications are viewed as being little more than a rubber stamping exercise. Relaxing the rules, need for a consent or obtaining a global consent for such minor works is suggested.

The acquisition of new open space areas is primarily achieved through the subdivision process. This approach is appropriate to meet the City’s open space needs. For new open space areas created by the subdivision process, General Rule 2.9.2 requires that activities comply with the rules of the Open Space 1 Zone. This avoids the need for an immediate Plan Change, with the expectation that zoning maps will be updated at time of City Plan review. This is considered an effective interim method.

5.7.4 Effectiveness

The effectiveness of the City Plan is determined by how well controls land use in order to provide for the provision of, the use and protection of the city council park network, and the natural and physical resources in those parks.

Since the City Plan became operative, the provision of new growth-related regional gardens and heritage, sports and neighbourhood parks is now subject to the Council’s Development Contribution Policy 2009 - 2019. The City Plan was amended by Variation 91 to reflect this. This variation effectively deleted the rules within the City Plan relating to financial contributions on this matter. As a consequence, the City Plan no longer provides a mechanism to take or fund the new parks required as a result of land use development within the City.

The use of development contributions, instead of financial contributions, has dated or made redundant a number of the provisions within the City Plan. While development contributions, and the asset management strategies and policies that support these, can be viewed as ‘other methods’ in terms of the Resource Management Act 1991, the detail of the development contributions policy is largely a matter that the City Plan will not significantly influence. Consequently, those objectives and policies that relate to the ‘provision’, ‘distribution’ and ‘diversity’ of, and ‘contributions’ to, open space can no longer be effectively achieved or influenced by the City Plan. We recommend that these provisions are reviewed in light of this.

5.7.4.1 Conservation 2 Zone

The Conservation 2 Zone provides for the use, protection and development of the heritage, landscape, botanical, spiritual and recreational values of these parks.

As summarised in Figure 21, in 2010 the Council’s rating data-base shows that land use within the Conservation 2 Zone is consistent with the outcomes anticipated for this zone, being some form of conservation, community or recreation purpose (79%). A further 13% is used for

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169 For example, Objective 14.1
170 For example, Policies 14.1.1 to 14.1.4
multiple purposes, which is most likely a mix of these activities. The remainder of the land is largely used for rural purposes. There has been very little land use change that has required building consent. No new dwellings, one demolition, and no non-dwelling residential consent with an estimated value of in excess of $40,000, were granted building consent.

The resource consent data-base reinforces this finding. Between 2000 and 2010, the resource consent data includes 117 consents within the Conservation 2 Zone. Of these, approximately 71 (61%) relate to heritage, and 22 (19%) to protected tree, resources, all of which were granted. Typically the heritage related resource consents relate to alterations and maintenance of the heritage resource, or development occurring on the same site as the heritage resource. The protected tree consents are a mix of the removal, pruning and activities and works in close proximity, to the listed tree. Of the remainder of the consents, these largely relate to operation of the parks (i.e. public toilets) commercial activities occurring within the parks associated with the recreational use of those parks (i.e. kiosk), or advertising sign matters (i.e. bollards).

Field observations indicate that the buildings are compatible with the open space function of these areas. Often they are located on the external part of the site for functional reasons. Picture 10 is an example of the Conservation 2 Zone environment.

Overall the Conservation 2 Zone is effective in providing for use, protection and development heritage, landscape, botanical, spiritual and recreational values of these parks.

5.7.4.2 Conservation 4 Zone

The Conservation 4 Zone provides for the maintenance of cemeteries and the recognition and protection of the cultural and heritage values of these areas.

There are no relevant\textsuperscript{171} building consents granted between 2000 and 2010.

Between 2000 and 2010, the resource consent data-base includes five consents within the Conservation 4 Zone, all of which were granted. Three of these relate to signs at cemeteries. Two are associated with the same nine lot development at Johns/Wilkinsons roads. Field observations confirm this land is part way through the development process but is clearly separated from the crematorium, and will integrate with

\textsuperscript{171} For dwellings and non-dwellings with and estimated value of in excess of $40,000.
the adjoining residential development (see Picture 11). This indicates that the Conservation 4 Zone was not appropriate, but does not result in tension with the overall City Plan intended outcomes.

Overall from the information available the Conservation 4 Zone is effective in providing for use, protection and development of the cemeteries within it.

5.7.4.3 Open Space 1 Zone

The Open Space 1 Zone provides for small neighbourhood parks and the maintenance and enhancement of the amenity, recreation opportunity and open space values.

As summarised in Figure 22, in 2010 the Council’s rating data-base shows that land use within the Open Space 1 Zone is consistent with the outcomes anticipated for this zone, being some form of conservation, community or recreation purpose (82%). The remainder of the land is for a variety of purposes. There has been very little land use change that has required building consent. No new dwellings, and one non-dwelling residential consent with an estimated value of in excess of $40,000, were granted building consent.

The resource consent data-base reinforces this finding. Between 2000 and 2010, the resource consent data includes 37 consents within the Open Space 1 Zone. Of these, the large majority relate to the development of the park resources (18, 49%) or the management of trees (10, 27%). Five (14%) relate to utilities and the others to various one off matters. There is no evidence of a systematic pattern of new land uses being consented that would not be expected within the Open Space 1 Zone.

Field observations suggest that these areas are low scale neighbour reserves, often with low intensity recreational facilities such as children’s play areas, and the occasional public structure. Picture 12 is an example of an Open Space 1 Zone environment which has a public structure erected in it as a result of resource consent.

Therefore, overall the Open Space 1 Zone is effective in providing for small neighbourhood parks and the maintenance and enhancement of the amenity, recreation opportunity and open space values of these.
5.7.4.4 Open Space 2 Zone

The Open Space 2 Zone provides for the provision of a network of district parks providing significant recreation opportunities enhancement of these opportunities.

As summarised in Figure 23, in 2010 the Council’s rating data-base shows that land use within the Open Space 2 Zone is consistent with the outcomes anticipated for this zone, being some for conservation, community or recreation purpose (83%). The remainder of the land is for a variety of purposes.

The building consent data-bases show two matters of relevance. The first is that part of Wainoni Park has been developed for residential purposes. The second is that the small number (7) building consents for non-dwelling purposes with an estimated value of in excess of $40,000, all relate to recreation and community activities.

The resource consent data-base reinforces this finding. Between 2000 and 2010, the resource consent data includes 118 consents within the Open Space 2 Zone. Of these, the large majority relate to the development of the park resources, including changes to buildings and the provision of lighting. Only eight (7%) relate to utilities, one to the Wainoni Park residential development as identified from the building consents data-base, and a small number of the other miscellaneous matters. There is no evidence of a systematic pattern of new land uses being consented that would not be expected within the Open Space 2 Zone.

Field observation indicates that these areas are more developed for community and sports purposes, including associated buildings. There are isolated instances, such as Wainoni Park, where the edges of these open space areas have been developed for other purposes, often associated with a reconfiguration of the open space area. Picture 13 is a typical example of an Open Space 2 Zone environment.

Overall the Open Space 2 Zone is effective in providing for provision of a network of district parks providing significant recreation opportunities enhancement of these opportunities. However, the Zone boundary associated with Wainoni Park needs adjusting to reflect the residential development associated with Ben Rarere Avenue.
5.7.4.5 *Open Space 3A Zone*

The Open Space 3A Zone provides for the development and use of the land at McLeans Island for a wider range of recreational purposes.

McLeans Island has been subject to considerable development for passive and active recreation purposes. Environment Canterbury has developed the area as the first stage of developing a Waimakariri River Regional Park.

As summarised in Figure 24, in 2010 the Council’s rating data-base shows that 61% land use within the Open Space 3A Zone is consistent with the outcomes anticipated for this zone, being some form a conservation, community or recreation purpose. The remainder of the land is largely noted as ‘other uses or multiple uses’. Field observation indicates that this area has a wide variety of uses, with the appearance of privatisation of open space. There is a number of private, but community, orientated clubs with facilities in this area. These include kennel, golf, equestrian and vintage machinery clubs. However, we did not identify significant land uses occurring that would not be expected within this zone. Picture 14 is a typical example of the Open Space 3A Zone.

Only three relevant building consents were granted between 2000 and 2010. These all relate to activities expected within this zone, being for education, avairy and community purposes.

Between 2000 and 2010, the resource consent data-base includes ten consents within the Open Space 3A Zone, all of which were granted. These were for a mix of non-residential activities. There is no observable pattern of the type and location of consents.

Overall from the information available the Open Space 3A Zone is effective in providing for use, protection and development of recreation and open space resources associated with McLeans Island.

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173 For dwellings and non-dwellings with and estimated value of in excess of $40,000.
5.7.5 Efficiency

Within the open space and recreation group, the land use consent applications were all granted for those which an outcome is recorded in the resource consent data-base. Table 17 shows that a large majority of resource applications were processed on a non-notified basis. This is significant in that it indicates those non-compliances were considered (largely during the study period) to have insignificant effects on the environment for the purposes of determining the process the resource consent application was to follow, or the City Plan had already determined that public notification was not required.

<table>
<thead>
<tr>
<th>Process</th>
<th>Conservation 2</th>
<th>Conservation 4</th>
<th>Open Space 1</th>
<th>Open Space 2</th>
<th>Open Space 3A</th>
</tr>
</thead>
<tbody>
<tr>
<td>Non notified</td>
<td>108</td>
<td>5</td>
<td>36</td>
<td>111</td>
<td>9</td>
</tr>
<tr>
<td>Service</td>
<td>-</td>
<td>-</td>
<td>1</td>
<td>2</td>
<td>-</td>
</tr>
<tr>
<td>Notified</td>
<td>2</td>
<td>-</td>
<td>-</td>
<td>4</td>
<td>-</td>
</tr>
<tr>
<td>Not known</td>
<td>7</td>
<td>-</td>
<td>-</td>
<td>1</td>
<td>1</td>
</tr>
</tbody>
</table>

Table 17: Open Space and Recreation Group Resource Consent Processes 2000-2010\(^{174}\)

In totality, with the open space and recreation group, the rules triggers are resulting in a significant number of resource consent applications where the effects on the environment appear to be considered as minor in the specific circumstances. In particular, the bulk of the resource consents were for land use activities that you would expect to occur within the individual zones. As a consequence, it is possible that fine tuning the different rule thresholds, or placing greater reliance on other legislation to manage the public reserves, may increase the efficiency of the City Plan. This is particularly where the ownership of these areas is by a public agency.

There is no apparent pattern in the type\(^{175}\) of standard breached and the public notification of the resulting resource consent application.

5.7.6 Summary of Effectiveness and Efficiency

The effectiveness and efficiency of City Plan policies, rules, or other methods in achieving its objectives is summarised in Table 18.

<table>
<thead>
<tr>
<th>Objective</th>
<th>Effectiveness</th>
<th>Efficiency</th>
</tr>
</thead>
<tbody>
<tr>
<td>4.2 A pleasant and attractive City</td>
<td>High</td>
<td>Amenity values attributed to open space areas being recognised and protected. Reduced (Significant number of resource consent and the ability for other legislation to be more effective at achieving outcomes)</td>
</tr>
<tr>
<td>14.1 Provision and diversity</td>
<td>Medium</td>
<td>Through use of development contributions, provision and diversity of open space no longer influenced by City Plan.</td>
</tr>
<tr>
<td>14.2 Efficient and effective use</td>
<td>Low/Medium</td>
<td>Better use can be achieved through other mechanisms such as Management Plan.</td>
</tr>
<tr>
<td>14.3 Design and appearance</td>
<td>High</td>
<td>Facilities sympathetic to heritage, landscape, natural, cultural and scenic values.</td>
</tr>
<tr>
<td>14.4 Adverse environmental effects</td>
<td>High</td>
<td>Development occurring is not adversely impacting on amenity values</td>
</tr>
<tr>
<td>14.5 Airport operations</td>
<td>High</td>
<td>Open space areas do not impact upon the Christchurch International Airport operations.</td>
</tr>
</tbody>
</table>

Table 18: Summary of Effectiveness and Efficiency of the Open Space and Recreation Group

\(^{174}\) Subdivision consents have largely been excluded from this table.

\(^{175}\) i.e. development, community or critical.
Resulting from this evaluation, to increase effectiveness and efficiency, we recommend that:

1. Given the Council’s *Public Open Space Strategy 2010 to 2040* and *Development Contribution Policy 2009 - 2019*, the role of the City Plan in determining the provision, distribution and diversity of public open space and recreational areas resulting from changes in subdivision and land use is reconsidered, and the relevant policies and methods in the City Plan are reviewed and amended accordingly.

2. The zone boundaries are reviewed and updated to reflect changes in land use, including at Johns/Wilkinsons roads (Conservation 4 Zone) and Ben Rarere Avenue in Wainoni Park (Open Space 2 Zone).

3. The triggers associated with individual rules are reviewed to reduce the number of non-notified resource consents.

4. The Council investigate opportunities to reduce the number of resource consent applications largely required of itself by permitting the undertaking works and activities identified and which accord with the Reserves Act processes such as Reserve Management Plan.
### 5.7.7 Addendum: Summary of the City Plan for the Open Space and Recreation Group

<table>
<thead>
<tr>
<th>Objectives</th>
<th>Key Provisions</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>City Identity Objective</strong>&lt;br&gt;A pleasant and attractive City</td>
<td>Key AERS&lt;br&gt;1. Enhancement of amenity values&lt;br&gt;2. Increased amount of public open space and improved distribution&lt;br&gt;3. Convenient and accessible open space to users&lt;br&gt;4. Increased multiple use of open space</td>
</tr>
</tbody>
</table>
| **Recreation and open space Objective**<br>Quality open space and a range of recreationally opportunities in the City. | **Zone description and purpose**
| **Specific objectives** | **Open Space 1 (Neighbourhood Recreation and Open Space) Zone**<br>Maintenance of open space character, including not cluttered by facilities, while maintaining the role as a recreational area and visual open space for local neighbourhoods.<br>**Open Space 2 (District Recreation and Open Space) Zone**<br>Recognise those parks with substantial physical resources within them while maintaining open space and managing pressures of high public use.<br>**Open Space 3 (Metropolitan Facilities) Zone**<br>Recognise important metropolitan resources while protecting the surrounding environment from adverse effects of activities.<br>**Open Space 3A (McLeans Island) Zone**<br>Recognise the landholdings of the Canterbury Regional Council and the considerable visual amenity, conservation and recreational potential of this land.<br>**Conservation 1 (Natural, ecological and scenic parks) Zone**<br>Comprises public land of particular scenic, natural, habitat and ecological values. Importance for passive and generally informal recreation and land management must take into account impact of human activities of fragile ecological systems.<br>**Conservation 4 (Cemeteries)**<br>Cemeteries have important open space values. Zone provisions will maintain and enhance the open space and cultural values associated with these areas. |
| 4.2 To ensure the development and protection of the quality of public open spaces. | **Open Space 1 (Neighbourhood Recreation and Open Space) Zone**<br>Maintenance of open space character, including not cluttered by facilities, while maintaining the role as a recreational area and visual open space for local neighbourhoods. |
| **14.1**<br>(a) Open spaces and recreational facilities that are equitably distributed and conveniently located throughout the City.<br>(b) Diversity in the type and size of open spaces and recreational facilities to meet local, district, regional and nationwide needs. | **Open Space 2 (District Recreation and Open Space) Zone**<br>Recognise those parks with substantial physical resources within them while maintaining open space and managing pressures of high public use. |
| **14.2**<br>(a) The efficient and effective use of open space and recreational facilities in meeting the recreational needs of the community.<br>(b) Enhanced public awareness and enjoyment of the City's open spaces and recreational facilities. | **Open Space 3 (Metropolitan Facilities) Zone**<br>Recognise important metropolitan resources while protecting the surrounding environment from adverse effects of activities. |
| **14.3**<br>Open spaces and recreational facilities that are designed to be sympathetic to the scale and character of the surrounding environment, and to the particular characteristics of the area itself. | **Open Space 3A (McLeans Island) Zone**<br>Recognise the landholdings of the Canterbury Regional Council and the considerable visual amenity, conservation and recreational potential of this land. |
| **14.4**<br>That the establishment or development of open spaces and recreational facilities is undertaken in a manner which enables adverse effects on amenity values to be avoided, remedied or mitigated. | **Conservation 1 (Natural, ecological and scenic parks) Zone**<br>Comprises public land of particular scenic, natural, habitat and ecological values. Importance for passive and generally informal recreation and land management must take into account impact of human activities of fragile ecological systems. |
| **14.5**<br>Development within Open Space zones is of a scale and character consistent with the safe and efficient use and development of Christchurch International Airport. | **Conservation 4 (Cemeteries)**<br>Cemeteries have important open space values. Zone provisions will maintain and enhance the open space and cultural values associated with these areas. |
### Policy areas
1. Public open space
2. Areas of deficiency
3. Convenience and accessibility
4. Contributions from development and subdivision
5. Use of cash contributions
6. Existing open space
7. Large scale private facilities
8. Metropolitan recreational open space and facilities
9. Types
10. Diversity of environments
11. Green linkages
12. Surface waters
13. Surface and margins of rivers
14. Rural areas
15. Redevelopment of sites
16. Multiple use
17. Quality
18. Natural, cultural and scenic values
19. Garden City image identity
20. Indigenous vegetation
21. Relationship to the local area
22. Adverse effects
23. Local amenities
24. Open space character
25. International airport operations
26. Bird strike issues

### Zone AERS
#### Open Space 1 (Neighbourhood Recreation and Open Space) Zone
1. Network of small neighbourhood parks
2. Open space within walking distance of most suburban dwellings
3. Enhancement of the City’s amenities

#### Open Space 2 (District Recreation and Open Space) Zone
1. High level of public use
2. Provision of buildings and facilities to facilitate formal and informal recreation
3. System of large areas of public open space for recreation
4. Enhancement of the City’s amenities
5. Exclusion or mitigation of activities causing adverse effects on surrounding living zones
6. Maintenance and enhancement of ecological heritage sites

#### Open Space 3 (Metropolitan Facilities) Zone
1. Facilities and structures to enhance and facilitate indoor and outdoor/formal and informal recreation
2. Open space associated with major recreational facilities
3. Large scale buildings and facilities
4. Adequate facilities for city wide, regional and national events
5. Limitation of adverse effects as much as possible through the provision of landscaping various and associated techniques.

#### Open Space 3A (McLeans Island) Zone
1. Wide range of recreational activities and associated facilities
2. Buildings of a scale and density subservient to large-scale rural open spaces and substantial trees
3. Minimised risk from fire
4. Minimised risk from flooding
5. Management of bimetal effects

#### Conservation 1 (Natural, ecological and scenic parks) Zone
1. Control development and public use to ensure character remains substantially unchanged
2. Conservation and enhancement of ecological, scientific, landscape, botanical, cultural, heritage, functional values
3. Maintenance and enhancement of the City’s identity and character
4. Protection and enhancement of ecological heritage sites

#### Conservation 4 (Cemeteries)
1. Recognition and protection of land for its cultural and heritage value
2. Maintenance of cemeteries as peaceful areas of open space
3. Provision of adequate land to meet community needs
5.8 Rural Hills

5.8.1 Summary

The primary focus of the City Plan with respect to the Rural Hills area is to ensure that activities retain an open character, particularly in areas above the 160 metre contour. The Rural Hills group is made up of only one zone being the Rural Hills zone. The zone provisions do differentiate between the area above and below the 160 metre contour.

Parts of the Ports Hill area are also covered by the Summit Road (Canterbury) Protection Act 2001. This applies to ‘protected areas’ listed in that Act, generally being within the vicinity of Summit Road. It requires written consent is obtained from the Summit Road Protection Authority for certain actions on that land.

The Rural Hills Zone is effective in providing for the open space characteristics with a low density of buildings and development. Much of the area is managed and used in a combination of extensive pastoral grazing and as a recreation resource. The Christchurch City Council owns greater areas of land in the Port Hills area than when the City Plan was developed. This land is leased for grazing and has a network of tracks for recreational users. The Rural Hills area is highly valued for its environmental, open space, landscape, scenic, historic and recreation attributes.

The City Plan’s efficiency is unchanged.

It is recommended that:

1. The appropriateness of the zoning of the Rural Hills Zoned land owned by Christchurch City Council is reconsidered given that its primary focus is no longer solely on rural farming activities.

2. The change in management controls above and below the 160 metre contour is reconsidered as there is no discernable visible differentiation in the nature of development occurring within the zone between those parts above and below the 160 metre contour.

3. The dual administration approach between the Resource Management Act (City Plan) and the Summit Road (Canterbury) Protection Act 2001 (Summit Road Protection Authority) should be specifically considered to remove management duplication.
5.8.2 Introduction

The Rural Hills Zone relates to those parts of the city extending from Godley Head to the east to Old Tai Tapu Road in the west, and generally from the base to the crest of the Port Hills excluding those areas which are existing urban development areas (see Figure 25).

Visual amenity values are a core focus of the Port Hills Zone. It has outstanding natural features, open landscape and rural characteristics. Unique features that contrast these hills with the remainder of the plain on which the city is located, include large areas identified for their ecological heritage value comprising native flora and fauna, rocky outcrops, tussock land, an imposing skyline, and upper spurs largely free of visible buildings.

The zone recognises that the landscape values of the Port Hills are particularly important in the area east of Dyers Pass Road as this area forms the back drop to the City. The hills provide the location of significant recreational areas of public reserves, walking tracks and scenic drives. When the zone was established it was identified that forestry plantations have been established and apart from recreation, extensive pastoral farming is the dominant activity on much of the hills.

The primary City Identity and Rural objectives seek respectively a distinctive city where form, amenity and heritage values are maintained and enhanced and the sustained potential of land, soil, water and infrastructural resources in the rural area to support life and to meet reasonably foreseeable future rural and urban needs.

In summary, the City Plan seeks the following outcomes for these locations:

1. Maintenance of the open landscape character and quality of the visual amenities and protection of areas of outstanding natural features and landscapes.
2. Recognition of different character outcomes between the lower slopes (more development activity) and upper slopes and ridges (open character).
3. Protection of opportunities for public access and use.
4. Management of soil resource to reduce erosion and manage surface water drainage and possible effects on downstream river catchments.
5. Protection of natural vegetation, biodiversity, soil and landform associations.
6. Management of activities and buildings to minimise risk of fire damage.

Figure 25: Geographical Extent of the Rural Hills Group
Overall the primary focus of the zones is to maintain open space characteristics and protect natural values, rather than any productive rural use.

Some of the land within this group is within the area of land covered by the Summit Road (Canterbury) Protection Act 2001. The purpose of this Act is:

(a) to provide for the preservation and protection of the scenic amenity associated with the Summit Road and other roads, walkways, paths, and public open spaces within the protected land;

(b) to provide for the preservation and protection of natural amenities associated with land within the protected area;

(c) to provide for the improvement of facilities for the public enjoyment of the scenic amenity and the natural amenities\textsuperscript{176}.

The Act provides for the existence of the Summit Road Protection Authority\textsuperscript{177} and for the operation and duties of that Authority and committees, including addressing interactions with the Resource Management Act 1991. The Act controls actions within the defined protected areas, which can only be undertaken with the written consent of the Authority.

In this section the outcomes from interviews with key City Council staff are recorded, effectiveness and then efficiency is considered, a summary of the key findings and recommendations is provided, and finally an addendum is included summarising the relevant City Plan provisions.

### 5.8.3 Interviews with City Council Staff

We interviewed key staff from plan policy and plan administration. The focus of the interviews centred around five matters:

1. The effect of non-rural activities on the dominance of rural land use.
2. Changes in rural character relating to both the upper slopes (over 160m contour) and lower slopes (under 160m contour).
3. Changes in built form and intensity of rural activities.
4. Protection and maintenance of ecological, recreational and natural values.
5. Workability of parts of the City Plan.

#### 5.8.3.1 Rural land use

There are few non-rural activities establishing. While there were a noticeable number of inquiries regarding the establishment of exotic forestry\textsuperscript{178} over the past two years, this has not progressed to any application for resource consent\textsuperscript{179}.

Overall, there is little pressure for land use change. This was attributed to: the size of land parcels, Council land ownership, Council agreements with private land owners, and the impact of the Summit Road Protection Act on managing land use activities on the Port Hills.

\textsuperscript{176} Section 3 of the Summit Road (Canterbury) Protection Act 2001.

\textsuperscript{177} A committee of Christchurch City and Selwyn District councils.

\textsuperscript{178} In response to dairy conversations on plains, farmers looking for alternative site to establish exotic forestry lots.

\textsuperscript{179} Non-Complying Activity – Rule 2.5.10.
5.8.3.2 **Rural character**

There is little change in rural character. This is reflected in the few resource consents and limited extent of development (rural or otherwise) occurring. Where development of a non-rural nature (generally observed as being for residential purposes) is occurring, this is generally confined to areas where land zoned Living Hills immediately adjoins land zoned Rural Hills or where large blocks of land experience split zoning. This is not viewed as intruding into or eroding rural character.

5.8.3.3 **Built form**

There is little pressure for development to establish over and above current City Plan bulk and location rules. Low density built form anticipated in this zone is apparent and not under threat. This is not a factor of thresholds established in bulk and location rules being too restrictive but primarily a result of a non-complying activity status applying to more intense development, particularly where located above the 160m height contour.

5.8.3.4 **Protection and maintenance of ecological, recreational and natural values**

With regards to the protection and maintenance of ecological, recreational and natural values, these values are not under pressure or threat of degrading. The majority of these areas are currently owned by the Council or the Port Hills Trust Board. This being the case, deliberate land management practices and approaches ensure that ecological, recreational and natural values are maintained, and where possible, qualities and values improved. For those areas of land with ecological, recreational and natural values in private ownership, there is to be no noticeable change in the size, scale and quality of those values.

5.8.3.5 **City Plan implementation**

No particular issues, concerns or problem areas are identified regarding City Plan bulk and location rules.

5.8.4 **Effectiveness**

The effectiveness of the City Plan is determined by how well it controls land use in order to achieve and provide for the use and development of these activities while controlling the adverse effects on the surrounding environment.

5.8.4.1 **Land Use Activities**

Within the Rural Hills area, while a rural zone, the primary focus of activities is that they retain an open character, particularly above the 160 metre contour.

As summarised in Figure 26, in 2010 the Council’s rating data-base shows that 92% of land use within the Rural Hills Zone is rural. Residential activities account for 5% of the land area while all other uses are less than 2%. When looking at the type of rural activities

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180 Zone boundary not following a cadastral boundary but instead located through a property boundary.
181 Rule 2.5.4 Site coverage – Rural activities, Rule 2.5.5 Site coverage – Other activities.
occurring, the Agri-Base data identified that forestry is the largest non-pastoral use, with an area of just less than 650 hectares. All other uses are very small at less than 6 hectares overall.

Within the Port Hills the Christchurch City Council has purchased significant areas of land and is managing this as open space or for very low level farming. While a formal list of this land is not available, feedback from Council Officers identifies that it is a significant area including 300 hectares on Richmond Hill and 100 hectares on Mr Pleasant. Other areas of land on the Port Hills have also been purchased by Christchurch City Council but this land has been zoned Cultural 1 or identified as being reserves (including land in the Heathcote Valley). The Christchurch City Council management of this land is consistent with the objectives of the Rural Hills Zone. Much of the land is being made available for recreational use including walking and mountain biking activities. Picture 15 shows an example of the typical track activities associated with recreational use of the Rural Hills Zone.

The overall level of activity occurring within the Rural Hills Area is low. The total number of changes in parcel sizes from June 2000 to May 2010 is 73. In the Rural Hills Zone there is no evidence through the land use activities, the building consent data or the resource consent data that any change in parcel size is leading to different land use outcomes.

5.8.4.2 Rural Character

Overall, the rural character is that of open space with few buildings. The building consent and resource consent data identifies that the land use is for extensive activities. Only four building consents over a value of $40,000 were issued between 1990 and 2010. There are only two demolition consents issued. This shows that the character of the Rural Hills area is not being affected by increased building activity.

A greater number of resource consents have been processed showing a higher level of land use activity than building activity. The numbers represent a low level of activity compared to other areas in the City. Approximately 80 consent processes occurred. Of these,
approximately 20 occurred above the 160 metre contour. No resource consents above the 160 contour were declined and only one below the 160 metre contour was declined.

Above the 160 metre contour, of those applications with a non-compliance code entered three relate to waterways and two each for rural separation and rural site coverage. These numbers are small, so it is not possible to find any observable patterns of change. However, this low level of change accords with the City Plan objective of not seeking change in the character of the land above 160 metre height.

Below the 160m contour, most consent applications non-compliances (42%) are not categorised in the data-base. Of those that are, the greatest number of non compliances relate to waterways followed by vegetation clearance, site coverage and separation.

Observations from photos and field collaboration identify that there is no discernable differentiation between those parts of the Rural Hills Zone above and below the 160 metre contour. A clear differentiation between the Urban Zones and the Rural Hills zones is evident. However differentiation between above and below the 160 metre contour within the Rural Hills zone is not evident. Picture 16 is a typical example of the open character in the Rural Hills.

Field observations suggest that the non-compliances are not resulting in an observable effect on the open characteristics of the surrounding environment. Council staff interviews identified that most of the built form non-compliances are occurring in locations where there was a split Rural Hills and Living Zone. In these situations, the built form once established, appears as part of the Living Zone and does not detract from the open rural character.

5.8.4.3 **Built Form**

The City Plan rules for the Rural Hills are restrictive for the whole zone, especially above the 160 metre contour. Observations from staff and building and resource consent data confirm there is little building activity occurring in the Rural Hills Zone.

Field observations suggest that these non-compliances are not resulting in an observable effect on the surrounding environment. Non-compliances in built form are not changing the overall nature of the area.

5.8.4.4 **Other Matters**

The relationship of the City Plan and the Summit Road Protection Act should be considered. The Summit Road Protection Act provides for the Summit Road Protection Authority. This authority is made up of representatives of both Christchurch City Council and Selwyn District Council. The Act provides detail of how the Act interacts with the Resource Management Act.

Overall, the outcomes in the City Plan and the Act are consistent. However, there is duplication in the processes used to manage and administer this area. From an effectiveness perspective, it is important to consider the implications of the duplication and determine whether it is necessary or unnecessary.

Therefore, overall, the Rural Hills Areas:

1. Is effective in achieving an open space environment with little built form.
2. Is effective in retaining the current biodiversity and vegetation values.
3. Overall the zones function and level of use is more akin to a conservation zone rather than a rural zone.
4. Areas within the Rural Hills Zone owned by the Christchurch City Council may be more appropriately zoned as Open Space.

5. The differentiation in management approach above and below the 160 metre contour may be unnecessary.

6. Due to its spatial relationship and overlap with the area addressed by the Summit Road (Canterbury) Protection Act 2001 results in some duplication in the management and administration of this land.

5.8.5 Efficiency

Within the Rural Hills group there is only limited resource consent activity occurring. On the basis of the small numbers it is difficult to identify any particular trends or draw any firm conclusions from the data.

Overall, given the low number of consents occurring on a year by year basis it can be seen that the efficiency has not changed greatly from the time with City Plan was developed. There are no trends showing any particular pressure in activity type, process outcomes or location.

Just less than 100 resource consent and similar applications were processed for this area. Of the land use consent applications where an outcome is recorded in the resource consent data-base, only a single consent was declined. This was identified as being processed on a non-notified basis. Of those consents for which the consent process is categorised in the data-base, only three applications were publicly notified. One was discretionary activity, one a non-complying activity and one not for which the activity status was not specified.

Table 19 shows that a large majority of resource consent application were processes non-notified basis.

<table>
<thead>
<tr>
<th>Process</th>
<th>Activity Type</th>
<th>Controlled Activity</th>
<th>Discretionary Activity</th>
<th>Limited Discretionary</th>
<th>Non-Complying Activity</th>
</tr>
</thead>
<tbody>
<tr>
<td>Non-notified</td>
<td></td>
<td>12</td>
<td>23</td>
<td>15</td>
<td>24</td>
</tr>
<tr>
<td>Service</td>
<td></td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>Notified</td>
<td></td>
<td>1</td>
<td></td>
<td></td>
<td>1</td>
</tr>
</tbody>
</table>

Table 19: Rural Hills Group Resource Consent Processes 2000-2010\(^{182}\)

Table 20 shows similar information for that land in the Rural Hills Zone that falls above the 160m contour. All but one of the resource consent applications were treated as non-notified in this location.

<table>
<thead>
<tr>
<th>Process</th>
<th>Activity Type</th>
<th>Controlled Activity</th>
<th>Discretionary Activity</th>
<th>Limited Discretionary</th>
<th>Non-Complying Activity</th>
</tr>
</thead>
<tbody>
<tr>
<td>Non-notified</td>
<td></td>
<td>2</td>
<td>7</td>
<td>4</td>
<td>4</td>
</tr>
<tr>
<td>Service</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Notified</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>1</td>
</tr>
</tbody>
</table>

Table 20: Rural Hills above 160m Contour Group Resource Consent Processes 2000-2010\(^{183}\)

\(^{182}\) Subdivision consents have largely been excluded from this table.
While the data sets are small it can be seen that there is no particular pattern that indicates that non-complying activity applications are more likely to be notified.

Overall, within the Rural Hills group, the rules triggers are resulting in the majority of resource consent applications where the effects on the environment appear to be considered as minor in the specific circumstances. The overall level of activity is low and staff interviews indicate that the non-complying activity status is acting as a deterrent to applying for activities which may erode or reduce the open character of the Rural Hills.

### 5.8.6 Summary of Effectiveness and Efficiency

The effectiveness and efficiency of City Plan policies, rules, or other methods in achieving its objectives is summarised in Table 21.

<table>
<thead>
<tr>
<th>Objective</th>
<th>Effectiveness</th>
<th>Efficiency</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Outcome</strong></td>
<td><strong>Effectiveness</strong></td>
<td><strong>Comment</strong></td>
</tr>
<tr>
<td>2.1 Land and soil</td>
<td>High</td>
<td>The physical characteristics of land and soil is being maintained.</td>
</tr>
<tr>
<td>2.2 Water</td>
<td>High</td>
<td>The availability and quality of water resource is being maintained.</td>
</tr>
<tr>
<td>2.7 Port Hills</td>
<td>High</td>
<td>Distinctive landscape and characteristics of Port Hills are recognised and realised.</td>
</tr>
<tr>
<td>4.1 Form</td>
<td>High</td>
<td>Distinctive form and features of Port Hills are recognised and realised.</td>
</tr>
<tr>
<td>13.1 Rural land and soil resource</td>
<td>Medium</td>
<td>Land and soil resource not used for primary production however opportunity is not foreclosed.</td>
</tr>
<tr>
<td>13.2 Water resources</td>
<td>High</td>
<td>The availability and quality of water resource is being maintained.</td>
</tr>
<tr>
<td>13.3 Rural Infrastructure</td>
<td>High</td>
<td>Activities occurring do not impact on rural infrastructure.</td>
</tr>
<tr>
<td>13.4 Rural Amenity Values</td>
<td>High</td>
<td>Amenity values are maintained.</td>
</tr>
</tbody>
</table>

Unchanged (Limited pressure for land use change however uncertainty as to the appropriateness of a Rural zoning)

Table 21: Summary of Effectiveness and Efficiency of the Rural Hills Group

Resulting from this evaluation, to increase effectiveness and efficiency, we recommend that:

1. The appropriateness of the zoning of the Rural Hills Zoned land owned by Christchurch City Council is reconsidered given that its primary focus is no longer solely on rural farming activities.

2. The change in management controls above and below the 160 metre contour is reconsidered as there is no discernable visible differentiation in the nature of development occurring within the zone between those parts above and below the 160 metre contour.

3. The dual administration approach between the Resource Management Act (City Plan) and the Summit Road (Canterbury) Protection Act 2001 (Summit Road Protection Authority) should be specifically considered to remove management duplication.

---

183 Subdivision consents have largely been excluded from this table.
## 5.8.7 Addendum: Summary of the City Plan for the Rural Hills Group

### Objectives

<table>
<thead>
<tr>
<th>Natural Environment Objective</th>
<th>Key Provisions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Maintenance and enhancement of the quality of natural resources and their ability to meet the needs of present and future generations.</td>
<td><strong>Key AERS</strong></td>
</tr>
<tr>
<td><strong>City Identity Objective</strong></td>
<td><strong>Volume 2: Section 2 Natural Environment</strong></td>
</tr>
<tr>
<td>A distinctive city where form, amenity and heritage values are maintained and enhanced.</td>
<td>1. Maintenance of soil resource</td>
</tr>
<tr>
<td><strong>Rural Objective</strong></td>
<td>2. Retain soil stability and versatility</td>
</tr>
<tr>
<td>The sustained potential of land, soil, water and infrastructural resources in the rural area to support life and to meet reasonably foreseeable future rural and urban needs.</td>
<td>3. Maintain water quality</td>
</tr>
<tr>
<td><strong>Specific objectives</strong></td>
<td>4. Visual contrast between urban and rural areas</td>
</tr>
<tr>
<td>2.1 To maintain and enhance those physical, chemical and biological characteristics of land and soils, and the ecosystems they contain, in a way that best enables them to support life and provide for community needs.</td>
<td>5. Uniformly consistent landscape</td>
</tr>
<tr>
<td>2.2 Maintenance and enhancement of the quality and availability of the City’s water resources, and of the natural and cultural values and public accessibility of waterways and their margins.</td>
<td>6. Limited building development</td>
</tr>
<tr>
<td>2.7 Maintenance and enhancement of the distinctive landscape and natural characteristics of the Port Hills.</td>
<td>7. Indigenous re-vegetation</td>
</tr>
<tr>
<td>4.1 The maintenance and enhancement of natural and physical features and characteristics contributing to the distinctive form of the City.</td>
<td>8. Reductions in soil erosion</td>
</tr>
<tr>
<td>13.1 (a) That the rural land and soil resource be managed to:</td>
<td>9. Continued pastoral farming</td>
</tr>
<tr>
<td>• enable rural resources to continue to be used for a variety of rural activities while recognising the operational needs and the potential environmental effects of such activities;</td>
<td>10. Recreational opportunities</td>
</tr>
<tr>
<td>• provide scope for the appropriate establishment or extension of urban activities; and</td>
<td>11. Maintenance of character</td>
</tr>
<tr>
<td>• retain the stability and character of rural soils, and the life supporting capacity of the soil resource, including the potential for primary production, and to safeguard natural values.</td>
<td>12. Preservation of scenic amenities and skyline of Port Hills.</td>
</tr>
<tr>
<td>(b) That the open space character and low density built form which distinguish the rural area be maintained and enhanced.</td>
<td></td>
</tr>
<tr>
<td>13.2 Management of land use activities to protect the quality and availability of both surface and groundwater in the rural area of the City.</td>
<td></td>
</tr>
<tr>
<td>13.3 That infrastructure in the rural area be:</td>
<td><strong>Volume 2: Section 13 Rural</strong></td>
</tr>
<tr>
<td>• maintained to provide for the safe and efficient operation of activities in rural areas; and</td>
<td>1. Protection of Versatile soil</td>
</tr>
<tr>
<td>• established or improved which enables soil, water and air qualities to be maintained and enhanced, and impacts on amenity values to be minimised.</td>
<td>2. Protection of rural natural, ecological, landscape values</td>
</tr>
<tr>
<td>13.4 That over the rural area as a whole, rural amenity values, including visual character, heritage values, cultural and recreational opportunities are maintained and whenever possible enhanced, and adverse effects on activities are recognised and controlled.</td>
<td>3. Maintenance of open rural character, natural features and amenity values</td>
</tr>
<tr>
<td></td>
<td>4. Retention of services and infrastructure</td>
</tr>
<tr>
<td></td>
<td>5. Maintain soil and water quality and quantity</td>
</tr>
<tr>
<td></td>
<td>6. Maintain Christchurch airport operation</td>
</tr>
<tr>
<td></td>
<td>7. Compatible building patterns and densities</td>
</tr>
</tbody>
</table>

### Zone description and purpose

Recognition of outstanding natural feature and landscape values, grassland areas of ecological significance, control of erosion and soil instability, and provision of significant recreational opportunities.

### Zone AERS

1. Maintenance of open landscaped character and quality
2. Potential change on the lower slopes while maintaining open character of upper slopes and ridges
3. Public access to and views from the Port Hills
4. Reduce erosion and instability
5. Minimise effects upon downstream river catchments
6. Protection and enhancement of natural vegetation, soil and landforms
7. Conservation and enhancement of natural biodiversity
8. Minimise risk of fire

<table>
<thead>
<tr>
<th>Policy areas</th>
<th>12. Non-rural activities</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Structures and development</td>
<td>13. Building coverage</td>
</tr>
<tr>
<td>2. Rural/urban boundary</td>
<td>14. Rural dwelling densities</td>
</tr>
<tr>
<td>3. Indigenous vegetation</td>
<td>15. Excavation and filling</td>
</tr>
<tr>
<td>5. Recreational activity</td>
<td>17. Effluent disposal</td>
</tr>
<tr>
<td>8. Surface water</td>
<td>20. Natural and landscape values</td>
</tr>
<tr>
<td>10. Land use patterns and expectations</td>
<td>22. Fire risk</td>
</tr>
</tbody>
</table>

---

**FINAL: 28 January 2011**
5.9 Rural Plains

5.9.1 Summary

The primary focus of the City Plan with respect to the Rural Plains area is to provide for the sustained potential of land, soil, water and infrastructural resources to support life and meet reasonably foreseeable future rural and urban needs.

The Rural Plains Group relates to those parts of the City that provides for rural activities. It is made up of a number of zones being; Rural 2, Rural 3, Rural 4, Rural 5, Rural 6 and the Rural 7 Zones. The primary focus of the Rural 2, 3, 4, 5 and 7 zones is on the productive potential of the land. The Rural 6 focus is on maintaining the grasslands.

Overall, the zones are effective in providing for the characteristics of building in relation to the open space and scale of development. A low building density and a low scale and intensity of development is sought. Field observations indicate that the Rural 7 zone is the most insensitively developed of the Rural Plains group. As a trend, this is consistent with the Plan provisions which provide a greater intensity of development in the Rural 7 Zone over the other zones.

The key characteristic that is not evident is traditional productive use (i.e. farming as the predominate activity) of land in the Rural Plains Group. Overall, the trend and observations indicate that less productive use of this land is being made as a greater focus is provided for lifestyle housing. This land use, while not achieving one of the core objectives, does not entirely foreclose productive use as the land is still available for that use. Overall this key objective may not be achieved as a result of the development occurring between 2000 and 2010.

From an efficiency perspective, there is evidence that a number of the development and community standards used are resulting in resource consent processes where the effects on the environment are judged to be minor. While this evaluation cannot be definitive as to the degree to which these processes allow the City Plan objectives to be advanced, it can be tentatively concluded that in a number of instances, these standards may be overly onerous.

It is recommended that:

1. The continued relevance and appropriateness of productive potential of land and soil being the primary objective for rural zones is reviewed.

2. The overriding land use management purpose of these areas is reconsidered in light of the approach in Change 1 to the Regional Policy statement. Some of the areas within the Rural Plains group are within the urban limits and some are outside.

3. The City Plan better express what elements of the character and amenity of the areas outside of the urban limits are to be managed to provide greater clarity of the outcome expected.

4. The individual threshold relating to the bulk and location rules are reviewed to reduce the number of non-notified resource consent applications, and improve the certainty in the Plan. This includes: clarity around appropriate buildings and activities within the zone, changing the use of farm buildings to accommodate commercial activities, limitations applying to impervious services, family flats and rural selling places. The rural settling place rule serves little or no purpose.
5.9.2 Introduction

The Rural Plains Group relates to those parts of the City that has rural activities as the core focus (See Figure 27). The Rural Hills Group is made up of a number of rural zones which have a geographical focus. The group is made up of:

1. Rural 2 (Templeton-Halswell) Zone. This zone surrounds separately zoned urban areas of Templeton and Halswell, and adjoins the residential areas at Kennedy's Bush and Westmorland. Large areas of land are owned by health authorities and the Justice Department. In addition, there are two motorsport facilities located within this zone.

2. Rural 3 (Styx/Marshland) Zone. This zone is located in the north west area of the City and includes the majority of the Styx River catchment. The zone contains large areas of versatile soils. The zone surrounds the northern edge of the urban area and is identified as being potentially subject to pressures for urban expansion, particularly in the western part of the zone. Similar to the Rural 2 Zone, the main purpose of this zone is the maintenance of primary production.

3. Rural 4 (Waimakariri). This zone covers that part of the City immediately to the south of its boundary with the Waimakariri River. It covers areas from the City’s western boundary with Selwyn District to the Northern motorway and the margins of the Waimakariri River.

4. Rural 5 (Airport Influences). This zone surrounds most of Christchurch International Airport and extends to include the majority of that area within the 50 dBA Ldn airport noise contour. The zone also contains areas particularly subject to height restrictions relating to the aircraft approach slopes to airport runways. The zone's purpose is primarily the continuation of primary production while managing land use activities to avoid compromising airport operations and development.

5. Rural 6 (Grasslands). This zone covers a large area located west of the Christchurch International Airport. Most of the land is in the ownership of the Canterbury Regional Council. This zone contains extensive areas with ecological and open space landscape values. It is identified that the zone is suitable for the current use of extensive pastoral farming as well as for recreational activities. The protection of vegetation within this zone is considered important.

\[106\] This contour denotes the area within which noise levels are likely to normally exceed the 50 dBA Ldn sound level measurement resulting from the operation of aircraft in and around the airport.
6. Rural 7 (Port Hills Intensive Farming). The zone covers the Avoca and Horotane Valleys. These areas are recognised as being unique rural areas within the City and while having productive agricultural potential, the existing subdivision pattern of small section sizes is recognised.

The primary focus of these zones is the sustained potential of land, soil, water and infrastructural resources to support life and meet reasonably foreseeable future rural and urban needs. With the exception of the Rural 6 (Grasslands) Zone, the Rural Plains Group of zones has a focus on primary production. The Rural 2, 3 and 5 zones have significant areas occurring over the main Christchurch-West Melton groundwater recharge area where there are particular concerns regarding potential contamination by discharges from land use activities in the area. The Rural 4 zone, due to its soils, has more limited potential for agriculture or cultural activities. As well as primary production, this zone is recognised as being suitable for recreation activities and a defined floodplain management purpose.

The primary City Plan Rural objective is the sustained potential of land, soil, water and infrastructural resources in the rural area to support life and to meet reasonably foreseeable future rural and urban needs. In summary, the City Plan seeks the following outcomes for these locations:

1. Rural land uses utilising rural resources for primary production.
2. Except for the Rural 6 zone, generally smaller allotments with a low building density and a low scale and intensity of development.
3. Retention and protection of least modified areas of rural plains grasslands as indigenous plant habitat.
4. The sustainable management of groundwater.
5. Minimum traffic generation about some limited provision for rural retailing.

Overall, the primary focus of the zones, other than the Rural 6 zone, is the land being used for primary productive purposes. Within the Rural 6 zone the core focus is on protecting the ecological values and maintaining the open space characteristics.

Proposed Change 1 to the Canterbury Regional Policy Statement defines urban limits and hence rural areas within Christchurch City. This will influence the management of the existing rural areas going forward.

In this section the outcomes from interviews with key City Council staff are recorded, effectiveness and then efficiency is considered, a summary of the key findings and recommendations is provided, and finally an addendum is included summarising the relevant City Plan provisions.

**5.9.3 Interviews with City Council Staff**

We interviewed key staff from plan policy and plan administration. The focus of the interviews centred around five matters:

1. The effect of non-rural activities on the dominance of rural land use with a particular focus on primary production.
2. Changes in rural character.
3. Changes in built form and intensity of rural activities.
4. Protection and maintenance of land with ecological, recreational and natural values.
5. Workability of parts of the City Plan.
5.9.3.1 Rural land use

While a focus on continuing primary production is anticipated by the City Plan, this is not occurring. Land parcels are being utilised as large ‘lifestyle blocks’ primarily used as large landscaped gardens or (at best) for animal grazing rather than being put to primary production use, particularly in locations close to the existing urban edge. Areas where primary production of land is still occurring appear to be located further away from the city edge where land parcels were a larger size and soil quality remained highly versatile. For the majority of sites, the opportunity or ability for primary production in the future was not foreclosed. It has simply not been taken up by landowners.

Intensification of residential activities is further facilitated by the City Plan provision\textsuperscript{185} enabling the establishment of family flats. Once established, the second unit is being used for purposes other than providing for the housing needs of family members, namely rental accommodation, small offices or retailing space.

This trend towards intensifying the residential component associated with lifestyle blocks is resulting in increasing pressure for rural land on the urban fringe to be rezoned for urban purposes. This is represented by the increasing number of private plan changes currently being sought.

5.9.3.2 Rural character and amenity

Rural character is changing over time. Historically, section sizes were larger and there was less land fragmentation. Dwellings were smaller and accessory buildings were generally open structures housing farm equipment. Currently, large dwellings on small sections and fully enclosed accessory buildings used primarily for the storage of domestic goods and property as opposed to the storage of farming equipment. This has resulted in an increased sense of land size reduction and increased land fragmentation.

This has resulted in a character and amenity change including; increased area devoted to domestic landscaping and gardens, increasing use of solid fencing along road frontages and at vehicle access, increasing presence of impervious surfacing for driveways and around dwellings, increasing use of farm buildings for non-rural purposes, including use of accessory buildings and property for storage of domestic equipment and machinery. A number of rural properties do not appear to be used for rural activities.

The rural character in the Rural 5 Zone is under pressure. This is generally areas that immediately adjoin and to the north, south, and of the Special Purpose (Airport) Zone. Rural 5 Zone land to the south of the Special Purpose (Airport) Zone retains its open, low density rural character however staff anticipate this area to be subject to increasing development pressure for non-rural activities as new development establishes within the southern portion of the Special purpose (Airport) Zone.

Overall, the City Plan does not express clearly or in fine enough detail what elements of the rural character and amenity are required to be managed and maintained. This is problematic at time of resource consent applications for non-rural activities.\textsuperscript{186}

5.9.3.3 Built form

Development is rural areas is tending to become more rural ‘life style’ in appearance. However, the distinction between an open, low density rural environment and an intensive, higher density urban built environment is still present. This distinction is coming under pressure from the increasing demand for storage buildings and impervious surfaces serving the domestic components of rural

\textsuperscript{185} Part 4, Rule 2.3.4 Family Flats – Rural activities.
\textsuperscript{186} For example, storage units along Marshland Road where it was successfully argued that primary production was not foreclosed and buildings had similar size, appearance as farm buildings.
Evaluating the effectiveness and efficiency of the Christchurch City Plan

lifestyle living, as opposed to any rural components being undertaken on a property. The current City Plan bulk and location rules are unable to address the changing effects of ‘life style’ built form that is occurring.

Further pressure on the rural environment is occurring from structures being constructed without the necessary building and/or resource consent where such development is away from public view. The increasing appearance on road frontages of signage is also having a noticeable impact on the rural environment. However, this is primarily as a plan enforcement issue as opposed to a rule threshold consideration.

5.9.3.4 Protection and maintenance of ecological, recreational and natural values

With regards to the protection and maintenance of ecological, recreational and natural values, these values are not under pressure or threat of degrading. For those areas of land with ecological, recreational and natural values in private ownership, there to be no noticeable change in the size, scale and quality of those values. City Plan rules provide an appropriate level of protection for ecological, recreational and natural values located on the rural plains.

5.9.3.5 City Plan implementation

The bulk and location rules are appropriate to achieving the outcomes anticipated in the Rural Plains environment. However, some ‘fine tuning’ to existing rules would improve their effectiveness including; buildings associated with non-rural (residential) activities, changing use of farm buildings to house commercial activities such as cafes and restaurants, impervious surfaces, family flats and rural selling places. The rural selling place rule serves little or no purpose.

5.9.4 Effectiveness

The effectiveness of the City Plan is determined by how well it controls land use in order to achieve and provide for the use and development of these activities while controlling the adverse effects on the surrounding environment.

5.9.4.1 Rural Land Use

Within the Rural Plains area the primary land use anticipated is rural activities.

As summarised in Figure 28, in 2010 the Council’s rating data-base shows that land within the Rural Plains Group has 34% of the land area being used in a manner consistent with the outcomes anticipated for this zone, being rural. The dominant land use with both the greatest physical area and the greatest number of activities within the group is the ‘other category’. This accounts for 57% of the land within the zone. Most of this category of land use is ‘largely vacant, unimproved or improved for some residential’. Therefore, this land, while not used for productive rural purposes it does have open rural characteristics consistent with the Rural Plains area.

The overall impression is that this land is used as life-style blocks irrespective of site size. A number of these uses are occurring on either sites of long established size less than the minimum site areas in the City Plan or on sites which meet the current
minimum site size. Picture 17 is a typical example of this. The next largest use in terms of both the overall level of activity (21%) of all activities) and the area utilised (4%) is residential activities.

The overall level of activity occurring within the Rural Plains Area is moderate to low – the total number of changes in parcel sizes from June 2000 to May 2010 is just over 680.

The overall number of residential building consents for the same period is 263. The activity occurring is reasonably evenly distributed between the North East, North West, and South West areas. The amount of activity within the Port Hills area is much less (8 residential building consents). Over 40% of all residential building consent activity is occurring in the Rural 3 Zone, with 28% in the Rural 2 Zone, and 22% in the Rural 5 Zone Only 70 commercial building consents have been issued in the Rural Plains area.

The distribution by urban growth area is similar to that for residential building consents. On a zone basis 83% are occurring in the Rural 2, 3 and 5 zones.

Table 22 summarises the building consent information for the Rural 5 Zone. The overall level of building activity is generally low, and where it did occur it is within the 4ha proportion of the Rural 5 Zone. With respect to the new dwellings in the 4ha proportion of the Rural 5 Zone, there is a distinctive temporal pattern. Thirty of the dwellings (55%) were consented in the period 2000 to 2003.

<table>
<thead>
<tr>
<th></th>
<th>Rural 5: 4ha (No.)</th>
<th>Rural 5: 20ha (No.)</th>
</tr>
</thead>
<tbody>
<tr>
<td>New dwellings consented</td>
<td>55</td>
<td>3</td>
</tr>
<tr>
<td>Building consents for non dwellings of an estimated value of &gt;$40,000</td>
<td>13</td>
<td>2</td>
</tr>
</tbody>
</table>

Table 22: Building Consents between 2000 - 2010

The subdivision standards seek to retain lots of a size which retains their productive potential. The key focus of changes in parcel sizes is within the Rural 2 and Rural 3 Zones. These zones have an identified minimum size of 4 hectares. When looking at the changes in lot sizes within the Rural 2 and 3 Zones, over 50% in the Rural 2 and 77% in the Rural 3 zones resulted in parcel changes of 4 hectares or less. For the Rural 7 zone the minimum is 2 hectares. All of the changes in parcel sizes within this zone between 2000 and 2010 resulted in parcels of 2 hectares or less. The Rural 5 Zone provides for two different densities of development, being a minimum site size of 4 ha east or south of the Airport and 20 ha west or north of the Airport 187. The different densities largely relate to soil versatility 188. With respect to parcel size changes in these areas over 70% of all changes within the 4ha area and 75% of all changes in the 20ha area are below the minimum size in each.

188 Volume 3, Part 4, Section 5.1.13.
Overall, there is some limited intensification occurring within the Rural 2, 3 and 5 zones which are generally those areas identified as being suitable for productive rural uses. However, the intensification is not actually occurring to enhance the productive capacity of the area. This is reinforced through the interviews with staff and field collaborations.

5.9.4.2 Rural Character

Overall, the rural character is one of a dominance of open space over building. Generally, the land use data from the rating data-base referred to in the previous section identifies that while there is some rural use occurring, there is a predominance of open space over buildings.

The greatest number of resource consents has been obtained for rural separation (10% of consents), rural site coverage (10%), minimum density on a rural site (5%) and road setback (4%). These consent types are consistently the highest number of consents across the Rural 2, Rural 3, Rural 4, Rural 5 and Rural 7 Zones. These non-compliances frequently occurred in combination with other non-compliances as part of a single resource consent application. None of the applications for these non-compliances were refused.

Overall the numbers of consents are quite low and do not show a distinct pattern that would indicate that some of the standards are not achieving the rural character. Observations from photos show that rural characteristics such as open space, low density of buildings and vegetation remain evident across all zones. Character is also retained as a result of the use of shelterbelts and new landscaping undertaken at the time of the establishment of the dwelling. Picture 18 depicts a typical example of this. However, there is an increasing trend towards urban elements encroaching into the rural environment such as increased hard surfacing, number and location of accessory buildings and presence of infrastructure services such as footpaths, street lighting and similar. This is more evident in some zones than others, such as in the Rural 7 Zone, whereas such development is not as evident in the Rural 6 Zone.

There is more resource consent activity occurring than building consents, although the level of activity is still relatively low.

Future rural character will be influenced by Proposed Change 1 to the Canterbury Regional Policy Statement. Areas within the Rural Plains are within the defined urban limits included with Change 1. For these areas, retaining rural zoning into the future is unlikely. Consequently, the focus of the City Plan is to manage the transition to urban land uses for these areas. A further implication is that Change 1 defines rural activities to include residential activities on land over 4ha. This blurs the distinction between life-style land uses and rural productive land uses. This has implications for the City Plan’s rural productive focus.
5.9.4.3 Built Form

The City Plan rules manage the overall quantum of built form that can occur on a site. Consents have been processed for 81 different consent codes, although a significant proportion (67 of the 81) have less than 10 consents in each class. On the basis of such small numbers, it is not possible to distinguish particular patterns.

Field observations suggest that these non-compliances are not resulting in an observable effect on the surrounding environment, in terms of the overall density of building in open space. However it is changing the overall use of the land for productive activities.

Therefore, overall, the Rural Plains Areas:

1. Is not effective in achieving productive capability of the land.
2. Is effective in achieving an open space character with a dominance of open space over buildings.
3. As such the overall objectives core focus on productive potential may not be the most appropriate given the outcomes being achieved.

5.9.5 Efficiency

Within the Rural Plains group there is a greater level of activity of resource consent activity occurring than building consents, although the level of activity is still relatively low. Just over 980 resource consents were processed for this area. Of these approximately 95% were recorded as granted and only 2% were recorded as declined. Forty percent of all resource consents were for non-complying activities. The remaining outcomes were unspecified.

Table 23 shows that a large majority of resource consent application were processed on a non-notified basis. This is significant in that it indicates those non-compliances were considered (largely during the study period) to have insignificant effects on the environment for the purposes of determining the process the resource consent application was to follow, or the City Plan had already determined that public notification was not required.

<table>
<thead>
<tr>
<th>Process</th>
<th>Activity Type</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Controlled Activity</td>
</tr>
<tr>
<td>Non-notified</td>
<td>72</td>
</tr>
<tr>
<td>Service</td>
<td></td>
</tr>
<tr>
<td>Notified</td>
<td>1</td>
</tr>
<tr>
<td>Not known</td>
<td>1</td>
</tr>
</tbody>
</table>

Table 23: Rural Plains group resource consent processes 2000-2010

More non-complying activity applications were publicly notified compared to the other activity status’ applications. Only one discretionary application and fourteen limited discretionary activities were publicly notified. However, of relevance is that even for non-complying activity applications, significantly more were processed on a non-notified basis than were publicly notified. Within the Rural 5 Zone there were seven non-complying activities which were publicly notified, four were refused. While this is a relatively low number of all applications, it is likely they had a disproportional influence.

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189 Subdivision consents have largely been excluded from this table.
on the type and scope of applications that were subsequently lodged with the Council, particularly in relation to the creation of small new rural sites.

Overall, within the Rural Plains group, the rules triggers result in significant numbers of resource consent applications where the effects on the environment appear to be considered a minor in the specific circumstances.

5.9.6 Summary of Effectiveness and Efficiency

The effectiveness and efficiency of City Plan policies, rules, or other methods in achieving its objectives is summarised in Table 24.

<table>
<thead>
<tr>
<th>Objective</th>
<th>Effectiveness</th>
<th>Efficiency</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.1 Land and soil</td>
<td>High</td>
<td></td>
<td>The physical characteristics of land and soil is being maintained.</td>
</tr>
<tr>
<td>2.2 Water</td>
<td>High</td>
<td></td>
<td>The availability and quality of water resource is being maintained.</td>
</tr>
<tr>
<td>2.8 The Plains</td>
<td>Medium/High</td>
<td>Reduced (Significant number of resource consent applications and primary rural objective not being realised)</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Retention of least modified grasslands is being achieved. However, this may be a result of this land being primarily managed by Environment Canterbury as a Waimakariri River Regional Park</td>
</tr>
<tr>
<td>4.1 Form</td>
<td>High</td>
<td></td>
<td>Distinctive open form of the plains remains dominant.</td>
</tr>
<tr>
<td>13.1 Rural land and soil resource</td>
<td>Low/Medium</td>
<td></td>
<td>Land and soil resource not used for primary production however opportunity is not foreclosed.</td>
</tr>
<tr>
<td>13.2 Water resources</td>
<td>High</td>
<td></td>
<td>The availability and quality of water resource is being maintained.</td>
</tr>
<tr>
<td>13.3 Rural Infrastructure</td>
<td>High</td>
<td></td>
<td>Activities occurring do not impact on rural infrastructure</td>
</tr>
<tr>
<td>13.4 Rural Amenity Values</td>
<td>High</td>
<td></td>
<td>Amenity values are maintained.</td>
</tr>
</tbody>
</table>

Table 24: Summary of Effectiveness and Efficiency of the Rural Plains Group

Resulting from this evaluation, to increase effectiveness and efficiency, we recommend that:

1. The continued relevance and appropriateness of productive potential of land and soil being the primary objective for rural zones is reviewed.

2. The overriding management purpose of these areas is reconsidered in light of the approach in Change 1 to the Regional Policy statement. Some of the areas within the Rural Plains group are within the urban limits and some are outside.

3. The City Plan better express what elements of the character and amenity of the areas outside of the urban limits are to be managed to provide greater clarity of the outcome expected.

4. The individual threshold relating to the bulk and location rules are reviewed to reduce the number of non-notified resource consent applications, and or to improve the certainty in the Plan. This includes: clarity around appropriate buildings and activities within the zone, changing the use of farm buildings to accommodate commercial activities, limitations applying to impervious services, family flats and rural selling places. The rural settling place rule serves little or no purpose.
## 5.9.7 Addendum: Summary of the City Plan for the Rural Plains Group

<table>
<thead>
<tr>
<th>Objectives</th>
<th>Key Provisions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Natural Environment Objective</td>
<td>Key AERS</td>
</tr>
<tr>
<td>Maintenance and enhancement of the quality of natural resources and their ability to meet the needs of present and future generations.</td>
<td>Volume 2: Section 2 Natural Environment</td>
</tr>
<tr>
<td>City Identity Objective</td>
<td>1. Maintenance of soil resource</td>
</tr>
<tr>
<td>A distinctive city where form, amenity and heritage values are maintained and enhanced.</td>
<td>2. Retain soil stability and versatility</td>
</tr>
<tr>
<td>Rural Objective</td>
<td>3. Reduction in soil erosion</td>
</tr>
<tr>
<td>The sustained potential of land, soil, water and infrastructural resources in the rural area to support life and to meet reasonably foreseeable future rural and urban needs.</td>
<td>4. Maintain water quality</td>
</tr>
<tr>
<td>Specific objectives</td>
<td>5. Retention of significant open grass land and open space landscape</td>
</tr>
<tr>
<td>2.1 To maintain and enhance those physical, chemical and biological characteristics of land and soils, and the ecosystems they contain, in a way that best enables them to support life and provide for community needs.</td>
<td>6. Pastoral activities protect indigenous plants</td>
</tr>
<tr>
<td>2.2 Maintenance and enhancement of the quality and availability of the City's water resources, and of the natural and cultural values and public accessibility of waterways and their margins.</td>
<td>Volume 2: Section 4 City Identity</td>
</tr>
<tr>
<td>2.8 The retention of those least modified areas of the plains grasslands as indigenous plant habitats.</td>
<td>1. Retention of unique identity of rural plains</td>
</tr>
<tr>
<td>4.1 The maintenance and enhancement of natural and physical features and characteristics contributing to the distinctive form of the City.</td>
<td>Volume 2: Section 13 Rural</td>
</tr>
<tr>
<td>13.1 (a) That the rural land and soil resource be managed to:</td>
<td>1. Protection of Versatile soil</td>
</tr>
<tr>
<td>• enable rural resources to continue to be used for a variety of rural activities while recognising the operational needs and the potential environmental effects of such activities;</td>
<td>2. Protection of rural natural, ecological, landscape values</td>
</tr>
<tr>
<td>• provide scope for the appropriate establishment or extension of urban activities; and</td>
<td>3. Maintenance of open rural character, natural features and amenity values</td>
</tr>
<tr>
<td>• retain the stability and character of rural soils, and the life supporting capacity of the soil resource, including the potential for primary production, and to safeguard natural values.</td>
<td>4. Retention of services and infrastructure</td>
</tr>
<tr>
<td>(b) That the open space character and low density built form which distinguish the rural area be maintained and enhanced.</td>
<td>5. Maintain soil and water quality and quantity</td>
</tr>
<tr>
<td>13.2 Management of land use activities to protect the quality and availability of both surface and groundwater in the rural area of the City.</td>
<td>6. Maintain Christchurch airport operation</td>
</tr>
<tr>
<td>13.3 That infrastructure in the rural area be:</td>
<td>7. Compatible building patterns and densities</td>
</tr>
<tr>
<td>• maintained to provide for the safe and efficient operation of activities in rural areas; and</td>
<td>Zone AERS</td>
</tr>
<tr>
<td>• established or improved which enables soil, water and air qualities to be maintained and enhanced, and impacts on amenity values to be minimised.</td>
<td>(Generally for all unless specified)</td>
</tr>
<tr>
<td>13.4 That over the rural area as a whole, rural amenity values, including visual character, heritage values, cultural and recreational opportunities are maintained and whenever possible enhanced, and adverse effects on activities are recognised and controlled.</td>
<td>1. Maintenance of productive potential of versatile soil</td>
</tr>
<tr>
<td></td>
<td>2. Maintenance and enhancement of soil resource</td>
</tr>
<tr>
<td></td>
<td>3. Low density built form</td>
</tr>
<tr>
<td></td>
<td>4. Avoidance of flood damages</td>
</tr>
<tr>
<td></td>
<td>5. Protection of airports</td>
</tr>
<tr>
<td></td>
<td>6. Protection and enhancement of visual amenities</td>
</tr>
<tr>
<td></td>
<td>7. Appropriately located rural selling places</td>
</tr>
<tr>
<td></td>
<td>8. Sustainable management of groundwater</td>
</tr>
<tr>
<td></td>
<td>9. Public Access (Ru3)</td>
</tr>
<tr>
<td></td>
<td>10. Limitation on subdivision (Ru3)</td>
</tr>
<tr>
<td></td>
<td>11. Recognition and protection of ecological values</td>
</tr>
<tr>
<td></td>
<td>12. Passive recreational activities (Ru4, Ru6)</td>
</tr>
<tr>
<td></td>
<td>13. Minimise risk of fire (Ru6)</td>
</tr>
<tr>
<td></td>
<td>Zone description and purpose</td>
</tr>
<tr>
<td></td>
<td>Continued primary production (Rural 2, 3, 4, 5, 6 and 7), with elements of recreation and floodplain management (Rural 4 Zone), and grassland (ecological values) management (Rural 6).</td>
</tr>
<tr>
<td></td>
<td>Policy areas</td>
</tr>
<tr>
<td></td>
<td>1. Versatile soils</td>
</tr>
<tr>
<td></td>
<td>2. Soil degradation and rehabilitation</td>
</tr>
<tr>
<td></td>
<td>3. Groundwater quality</td>
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<tr>
<td></td>
<td>4. Water consumption</td>
</tr>
<tr>
<td></td>
<td>5. Flooding and groundwater recharge</td>
</tr>
<tr>
<td></td>
<td>6. Surface water</td>
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<tr>
<td></td>
<td>7. Indigenous grasslands</td>
</tr>
<tr>
<td></td>
<td>8. McLean Island grasslands</td>
</tr>
<tr>
<td></td>
<td>9. The Plains – maintain open space character</td>
</tr>
<tr>
<td></td>
<td>10. Building development</td>
</tr>
<tr>
<td></td>
<td>11. Land use patterns and expectations</td>
</tr>
<tr>
<td></td>
<td>12. Tourism and recreation development</td>
</tr>
<tr>
<td></td>
<td>13. Non-rural activities</td>
</tr>
<tr>
<td></td>
<td>14. Rural intensive farming</td>
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<tr>
<td></td>
<td>15. Building coverage</td>
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<td></td>
<td>16. Rural dwelling densities</td>
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<tr>
<td></td>
<td>17. Excavation and filling</td>
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<tr>
<td></td>
<td>18. Mineral extraction</td>
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<tr>
<td></td>
<td>19. Groundwater recharge</td>
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<tr>
<td>20.</td>
<td>Water extraction</td>
</tr>
<tr>
<td>21.</td>
<td>Surface water quality</td>
</tr>
<tr>
<td>22.</td>
<td>Effluent disposal</td>
</tr>
<tr>
<td>23.</td>
<td>International airport operations</td>
</tr>
<tr>
<td>24.</td>
<td>Flying activities – Wigram</td>
</tr>
<tr>
<td>25.</td>
<td>Road and rail networks</td>
</tr>
<tr>
<td>26.</td>
<td>Utilities</td>
</tr>
<tr>
<td>27.</td>
<td>Building stock</td>
</tr>
<tr>
<td>28.</td>
<td>Natural and landscape Values</td>
</tr>
<tr>
<td>29.</td>
<td>Adverse effects</td>
</tr>
<tr>
<td>30.</td>
<td>Fire risk</td>
</tr>
</tbody>
</table>
5.10 Suburban Commercial

5.10.1 Summary

The primary focus of the City Plan with respect to the suburban commercial group is to provide for a range of commercial, business and community activities. This is reflected in the type of land use which occurs within these areas, being primarily commercial in nature, with some provisions for residential activities. The suburban commercial group consists of the Business 1 (Local centre/District Centre Fringe), Business 2 (District Centre Core), Business 2P (District Centre - Parking), and Business RP (Retail Park) zones.

Conclusions on the effectiveness and efficiency of the City Plan in relation to retail distribution and the Business RP Zone must be treated with caution as the City Plan was recently changed by Variation 86. It is noted that this variation continues to provide for retail activities in a number of the suburban commercial group zones.

Putting to one side retail distribution issues, the City Plan is largely effective in controlling land use activities to achieve the type of land uses desired. However, a distinct change in built form between older business areas and more recently developed areas is occurring, particularly with respect to the relationship of building to the street and the location of car parks.

The exception to this is in two new development areas (Aidanfield and Northwood) where Business 1 zoned land is used for residential purposes. The reason for this is unclear, but may relate to the appropriateness of the original location, changes in the anticipated road patterns and/or market conditions. However, it is an indicator of an overall lack of effectiveness in ensuring the integration of commercial activities into new residential areas.

With respect to efficiency of the City Plan two observations are made:

1. A high proportion of development is requiring resource consent, typically granted on a non-notified basis.

2. Non-compliances with the transport related rules are by far the most common non-compliance resulting in resource consent application. Given that the activities in the suburban commercial areas by their very nature have a significant transport component associated with them, the efficiency of these rules is questionable.

It is recommended that:

1. Further consideration is given to whether the current wide range of traditional and more car orientated forms of commercial development, including the possible development intensity, are appropriate.

2. Further work is undertaken in relation to managing the interface between commercial areas and the surrounding environment, including the pressure for car-parking areas to be established out of zone on adjoining land.

3. Investigation is undertaken into why identified business areas in new resident Greenfield areas are not being developed for business activities and an appropriate City Plan response made.

4. Recognising the anticipated land use outcomes, individual rules relating to bulk and location of structures, signs, and the key transport related rules are reviewed to reduce the number of non-notified resource consents.
5.10.2 Introduction

The suburban commercial area incorporates the majority of the areas outside of the centre of Christchurch City where commercial activities, including retail, activities are provided for.

The suburban commercial area is made up of a number of areas zoned in the City Plan for commercial land uses (see Figure 29). It is made up of the:

1. Business 1 (Local centre/District Centre Fringe) Zone. The purpose of this zone is to provide for local opportunities for employment, community activities and convenient (often pedestrian) access to goods and services.

2. Business 2 (District Centre Core) Zone. The purposes of this zone are to: provide for building development of a significant scale and intensity; identify the core of business activity within a district centre, particularly with regard to retailing; and these centres usually contain important community facilities, whether in public or private ownership.

3. Business 2P (District Centre - Parking) Zone. This is a specialist zone to secure parking provision and to act as a buffer for residential areas. It applies to suburban centres at Linwood, Merivale, Shirley, New Brighton, Fendalton, Wairakei and Barrington.

4. Business RP (Retail Park) Zone. The purpose of this zone is to provide for large format retail centres that are predominantly accessed by private motor vehicle. However, it discourages small format retail activities that sustain the central city and district centres.

The primary City Plan business objective seeks a distribution, and diverse range, of business environments which meet the social and economic needs of the wider community, while avoiding, remedying or mitigating the potential adverse effects of their activities within the immediate area, and on the broader surrounding environment.

Therefore, the primary focus of the City Plan provisions relating to the suburban commercial group is the type of land use which occurs within these areas, being primarily commercial in nature, with some provisions for residential activities. As such the evaluation required is a consideration of the type of activity occurring within these zones and how these activities are controlled.

Variation 86 was made operative on 16 November 2009. This variation dealt with the distribution of retail within the City. Consequently, it affects the suburban commercial group. It introduced the Business RP Zone into the City Plan. Therefore, while this variation was publicly notified in August 2004, it is unlikely to have significantly influenced the implementation of the City Plan until it was beyond challenge in late 2009. Consequently, the information presented below which relates to retail distribution largely evaluates the City Plan before Variation 86. Therefore, conclusions on the
effectiveness and efficiency of the City Plan in relation to retail distribution and the Business RP Zone must be treated with caution.

Finally, we note that the 4 September 2010 earthquake has had a disproportional impact on the Business 1 and 2 zones, largely due to the location, age and construction style of the existing buildings. While this has not influenced our evaluation, we note that it is likely to result in a greater level of redevelopment pressure than is evident from the current trend information. This is likely to result in consideration of the type of land uses and the built form.

In this section the context for the evaluation is described, the outcomes from interviews with key City Council staff are recorded, effectiveness and then efficiency is considered, a summary of the key findings and recommendations is provided, and finally an addendum is included summarising the relevant City Plan provisions.

5.10.3 Context for the evaluation

An overview of the contextual information relating to the suburban Commercial areas is provided in Table 25.

<table>
<thead>
<tr>
<th>Location</th>
<th>Number of building consents for non-residential purposes in excess of $40,000 (2000 – 2010)(^{190})</th>
<th>Number of building consents for new dwellings (2000 – 2010)(^{191})</th>
<th>Number of properties subject to resource consents (2000 – 2010)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>No.</td>
<td>%</td>
<td>No.</td>
</tr>
<tr>
<td>North west</td>
<td>40</td>
<td>38</td>
<td>16</td>
</tr>
<tr>
<td>North east</td>
<td>12</td>
<td>12</td>
<td>-</td>
</tr>
<tr>
<td>South east</td>
<td>13</td>
<td>13</td>
<td>2</td>
</tr>
<tr>
<td>South west</td>
<td>15</td>
<td>14</td>
<td>9</td>
</tr>
<tr>
<td>Port Hills</td>
<td>2</td>
<td>2</td>
<td>1</td>
</tr>
<tr>
<td>Inner city</td>
<td>22</td>
<td>21</td>
<td>1</td>
</tr>
<tr>
<td>TOTAL</td>
<td>104</td>
<td>100</td>
<td>29</td>
</tr>
</tbody>
</table>

Table 25: Contextual Information for the Suburban Commercial Group

From this table it is observed:

1. There has been investment in the suburban commercial areas as shown by the number of non-residential building activity, with the majority of the consents occurring in the North West and inner city.

2. Only a small number of new dwellings have received building consent in the suburban commercial areas. However, in the north west and south west the number is higher than might be expected. This is related to the Northwood and Aidanfield developments.

3. Given the number of building consents identified, there has been a high level of resource consents within the suburban commercial areas. These consents largely reflect the geographic pattern of the non-residential building consents.

\(^{190}\) The number are likely to represent an under count as in some instances a building consent provides for multiple dwellings.

\(^{191}\) The number are likely to represent an under count as in some instances a building consent provides for multiple dwellings.
As shown in Table 26, over the period 2001 to 2010 the most significant change in area of land zoned for this purpose relates to the Business RP Zone. As this zone was introduced by Variation 86, it did not exist in 2001. Largely, the land included within this zone was previously zoned Business 3 or 4, but used for large format retail purposes. With respect to the Business 1 and 2 zoned land, little change has occurred. Overall, the area of land within this group has increased. This is a result of Variation 86 introducing the BRP Zone, which effectively rezoned areas of existing industrial zones which are predominately used for retail purposes.

### 5.10.4 Interviews with City Council Staff

We interviewed key staff from plan policy and plan administration. The focus of the interviews centred around four matters:

1. The effect of non-commercial activities on the dominance of commercial land use activities.
2. Changes in commercial character.
3. Changes in built form and intensity of commercial activities.
4. Workability of parts of the City Plan.

#### 5.10.4.1 Commercial land use activities

Historically, established commercial areas retain a strong commercial identity and a range of commercial activities to primarily serve the day to day need of the immediate community. For these areas, primary commercial characteristics are being retained. However, commercial activities on Business 1 land associated with new areas of Greenfield residential development is not occurring. Instead, Business 1 land is being developed for residential purposes. This is primarily because the City Plan permits residential activities to establish as of right and developers consider a better return for residential can be achieved. This brings into question the need to provide for local commercial shopping as there does not appear to be a need. In addition, location of Business 1 land appears to require closer consideration as factors such as accessibility, visibility and existing land uses impact upon the success of commercial areas. The approach of re-zoning land for local, convenience shopping purposes requires re-consideration.

There is increasing pressure to expand commercial activities within the Business 2 zone. District Centres have limited ability to expand within existing sites and many have reached their development capacity. Expansion of District Centres is placing pressure on land identified for parking purposes (Business 2P) to be developed for commercial purposes. District Centre operators, in turn, are looking beyond the Business 2P zoned land to provide additional car parking to meet car parking requirements.

#### 5.10.4.2 Commercial character and amenity

Commercial character and amenity is changing over time. Historically, shopping precincts and malls were small scale, with limited retail choice and one anchor tenant. Currently, commercial

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192 Aidanfield Subdivision, Northwoods Subdivision.  
193 Part 3, Rule 3.2 Residential activities.
development in both Business 1 and Business 2 Zones, but more so for Business 2 Zones, is intensified as local shopping precincts and malls seek to rebrand, redevelop and expand. New, multi levelled development having a diverse range of retail activities and multiple large tenants has resulted in a significant intensification of commercial character and amenity particularly regarding bulk and scale of buildings, visual appearance, traffic generation, outdoor advertising, lighting and landscaping.

Overall, while an intensification of commercial activity is occurring and resulting in a change in commercial character, this change is permitted, and therefore anticipated, by the City Plan. As a result, the level of intensification may be higher than anticipated at the time of preparing the City Plan.

5.10.4.3 Built form

The intensity of built form occurring is resulting in poor design outcomes particularly at the zone interface with residential properties. Currently, the bulk and location rules are viewed as being permissive and developers are developing their sites to the maximum. The City Plan is not controlling the visual appearance of large buildings resulting in the presence of large, blank walls. Landscape and design mitigation measures are not effective at managing visual effects. The built form outcomes are viewed as being poor. The current rule managing development and re-development of land is not considered to be effective because of its controlled activity status and the inability to influence or initiate meaningful design changes that would go to better integrate commercial areas with the immediate adjoining (usually living) environment.

5.10.4.4 City Plan implementation

Overall, the bulk and location rules are considered appropriate to achieving the outcomes anticipated in the commercial environment. This is confirmed by the relatively few resource consent applications being applied for. This is also due to the generally permissive nature of rules in the City Plan and developer unwillingness to go through the consent process and invite ‘trade competition’ based objections.

The current traffic generation rule is of concern. Commercial activities, by their nature, are accepted as being high traffic generators and should not be subject to the high traffic generator rule. Further re-consideration of all traffic related rules (including numbers of car parks) is required.

The City Plan rules are not viewed as effective at managing the effects at the interface with living zones. The environmental outcomes seeking to mitigate adverse effects on adjoining residential properties are not being achieved. There is a question around whether rules managing the design and appearance of building should be introduced.

New threshold rules for retail activities introduced through Variation 86 are seen as overly complicated and difficult to administer resulting in more work for plan administration staff.

5.10.5 Effectiveness

The effectiveness of the City Plan is determined by how well it controls development in order to achieve the desired mix of activities within the suburban commercial group.

194 Part 3, Rule 3.4.4.
195 Part 13, Rule 2.3.8.
196 Council is in the process of preparing a plan change (Plan Change 56) to assist in achieving better quality urban design outcomes in the range of zones across the Central City (within the Four Avenues) and Business 2 Zones. The proposed plan change is in the consultation and site survey stage only.
Within the suburban commercial area the predominant land use anticipated within the City Plan is commercial related, including retail, offices and other non-industrial type activities. Residences are anticipated.

Figure 30 summarises the land use information in 2010 from the Council's rating data-base. This provides an indication of the existing pattern of land uses within the suburban commercial group. Commercial land uses dominant (86%). Of these commercial land uses, approximately three quarters are categorised as 'retail use', one tenth as 'numerous commercial uses on one site or where the use is not previously specified', and a further one twentieth as 'offices'. There is a component of residential land uses (6%), of which approximately one third is located in the Business 1 Zone and one third in the Business RP Zone. The industrial land (5%) is primarily (approximately two thirds) located in the Business RP Zone. Overall, this data indicates that the land uses in the suburban commercial groups are largely as anticipated by the City Plan. Field observation supports this conclusion.

With respect to those building consents entered as new dwellings, the building consent data-base allows consideration of residential development between 2001 and 2010. This shows that development for residential purposes is largely focussed in the Business 1 Zone, with a single development of six dwellings occurring in the Business 2P Zone. Forty four new dwellings were consented in the Business 1 Zone. One of these was a 17 unit motel development on Bealey Avenue and can be discounted on this basis. The reminder of residential development occurred on vacant Business 1 Zone land in the Northwood and Aidanfield development. In both cases the field collaboration shows the entire zone is developed for residential purposes, and that this is not in substitution for new Business 1 type development elsewhere. There are different forms of commercial development associated with Northwood adjacent to the State highway and in conjunction with the Styx Mill Country Club. This indicates that in new residential areas, the Business 1 zone is not fully effective in achieving a convenient distribution of local commercial activities to meet the needs of the new residents. Further, at these two locations the Business 1 Zone is no longer appropriate.

However, at other locations, the demolition building consent data\textsuperscript{197} show that land within the Business 1 and Business 2 zones being redeveloped by removing residences and other buildings. In the Business 2 Zone a significant single event occurred in relation to the redevelopment of Eastgate (Linwood) Mall.

As summarised in Table 27, this redevelopment pattern is supported by the building consent data for non-dwellings\textsuperscript{198}. Redevelopment and development occurred

\begin{table}[h]
\centering
\begin{tabular}{|c|c|c|}
\hline
Zone & Building consent count & Description does not solely relate to commercial activity \\
\hline
B1 & 28 & 4 \\
B2 & 48 & 0 \\
B2P & 0 & - \\
BRP & 28 & 0 \\
\hline
\end{tabular}
\caption{Building Consents for Other Than Residential within Suburban Commercial Group}
\end{table}

\textsuperscript{197} Prior to the 4 September 2010 earthquake
\textsuperscript{198} Of a estimated value of $40,000 or greater
within the Business 1, 2 and RP zones, but as would be expected, not in the Business 2P zone. From reviewing the descriptions of these consents, they largely provided for solely commercial activities, and where they did not in the Business 1 Zone they typically provided for residential activities in conjunction with a commercial activity (3 out of the 4 entries).

The change in land parcel data indicates a moderate level of development activity within the Business 1 and 2 zones. The Business 2P and Business RP zones show little subdivision activity.

This is supported by the resource consent data (See Table 28). The key non-compliance categories relating to the business zone residential rules\(^{199}\) and the living zone rules\(^{200}\) all have very few entries\(^{201}\), together accounting for 9% of the recorded the non-compliances. All of these non-compliances were granted.

Overall, 18% of the recorded City Plan rule non-compliances related to the business zone rules. There is no discernible pattern in these non-compliances, with low levels on non-compliance across a number of different rules.

Field observations confirm the above analysis. It does highlight the preference for modern development to configure sites differently than the traditional form. The traditional pattern of strip development is dominated by buildings on the street frontage while a more recent pattern of street development shows frontage being dominated by car parking (compare Pictures 19 and 20). Examples of the modern development pattern include significant areas of landscaping, lighting, car parking and manoeuvring areas in front of the buildings, where traditionally these buildings fronted the street. This change in pattern creates the perception of the development being significantly more car focussed. It highlights that there are two distinct forms of commercial development occurring which the City Plan provides for. Whether both forms of development are appropriate requires further consideration as part of the City Plan review. We note that multiple considerations, including: urban design, the functionality of these areas, market preference and land owner investment considerations.

<table>
<thead>
<tr>
<th>Zone</th>
<th>Number of resource consents</th>
<th>Resource consents with transport non-compliances</th>
</tr>
</thead>
<tbody>
<tr>
<td>B1</td>
<td>257</td>
<td>101 39</td>
</tr>
<tr>
<td>B2</td>
<td>332</td>
<td>102 31</td>
</tr>
<tr>
<td>B2P</td>
<td>5</td>
<td>2 40</td>
</tr>
<tr>
<td>BRP</td>
<td>109</td>
<td>33 30</td>
</tr>
</tbody>
</table>

Table 28: Resource Consents with Transport Non-compliances

\(^{199}\) BURES.  
\(^{200}\) Which apply for residential activities in the Business 1 (part) and Business 2 (all) zones (Volume 2, Part 13, Rule 3.2).  
\(^{201}\) Two applications for BURES and approximately nine applications for other than commercial activities (all residential) for the LI codes.
It is also observed that as the suburban commercial areas, particularly those zoned Business 2, redevelop more intense built forms can be expected if market conditions support this. Existing development is of relatively low intensity and the City Plan permits a much higher plot ratio (which excludes parking areas)\textsuperscript{202}.

Transport non-compliances were the largest group of non-compliances, accounting for 42% of the recorded non-compliances. As shown in Table 28, between 30% and 40% percent of the resource consents in the suburban commercial group have transport non-compliances recorded against them, all but one were granted\textsuperscript{203}. These non-compliances cover the range of transport rules – traffic generation, parking, queue length and the like. The City Plan expects that transport will be a significant component of the anticipated activities which occur in the suburban commercial areas, and accordingly that this is appropriate within this environment. Therefore, as a generalisation, the number of resource consents being required, and granted on a non-notified basis, is high.

Non-compliances with outdoor advertising (sign) rules accounted for 20% of the recorded non-compliances. A significant proportion of these relate to sign area and number and height within the Business 1, 2 and RP zones. All of these non-compliances were granted. Field observations indicate typically signs relate to the business activity occurring, and where it does so, fit within the existing environment. This suggests that the sign rules may not be set in a manner which recognises the specifics of the different existing environments in these business zones.

Finally, we specifically considered the resource consent non-compliances within a 50m buffer of the suburban commercial zones in order to understand whether the type of land uses occurring in proximity to these areas were being influenced. There are low numbers of non-compliance code entries indicating commercial activities occurring\textsuperscript{204}. Field collaboration shows that there is limited evidence of systematic creep from the suburban commercial zones\textsuperscript{205} into adjoining zones, and where this does occur, typically relates to parking and service industries, rather than retailing.

5.10.6 Efficiency

Within the suburban commercial area, between 2000 and 2010 there were approximately 130 building consents for non-residential buildings in excess of $40,000 and new dwellings. This compares with 750 properties subject to resource consents in this period. While these numbers are not strictly comparable, they indicate that a significant proportion of development is requiring resource consent.

\textsuperscript{202} See Volume 3, Part 3, Rule 3.5.2
\textsuperscript{203} These percentages are an underestimation as the number of resource consents include subdivisions and activities which could not result in transport non-compliances such as signs.
\textsuperscript{204} LHOU (20 entries), LIRET (20 entries), TR250 and TR2SP (28 entries), HEOAN (39 entries)
\textsuperscript{205} Some commercial creep is evident in Fendalton, Ferrymead, Sydenham.
The resource consent process used and the outcome of that process are also indicators of efficiency. Table 29 summarises this for all resource consent non-compliances across the Suburban Commercial Group. The non-notified row is significant, reflecting those applications where the environment were considered (largely during the study period) insignificant.

<table>
<thead>
<tr>
<th>Process</th>
<th>Outcome</th>
<th>TOTAL</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Granted</td>
<td>Declined</td>
</tr>
<tr>
<td>Non notified</td>
<td>1113</td>
<td>0</td>
</tr>
<tr>
<td>Service</td>
<td>5</td>
<td>0</td>
</tr>
<tr>
<td>Notified</td>
<td>15</td>
<td>10</td>
</tr>
<tr>
<td>Not known</td>
<td>23</td>
<td>1</td>
</tr>
<tr>
<td>Total</td>
<td>1156</td>
<td>11</td>
</tr>
</tbody>
</table>

Table 29: Suburban Commercial Group Resource Consent Process by Outcome 2000-2010

Given this, Table 30 does not show any process differentiation between the different standards (development, community and critical) in the City Plan. However, it does demonstrate that applicants choose to breach the development standards more frequently than the community and critical standards.

<table>
<thead>
<tr>
<th>Process</th>
<th>Controlled</th>
<th>Limited discretionary</th>
<th>Discretionary</th>
<th>Non complying</th>
<th>Unknown</th>
</tr>
</thead>
<tbody>
<tr>
<td>Non notified</td>
<td>50</td>
<td>683</td>
<td>134</td>
<td>225</td>
<td>8</td>
</tr>
<tr>
<td>Service</td>
<td>-</td>
<td>2</td>
<td>3</td>
<td>0</td>
<td>-</td>
</tr>
<tr>
<td>Notified</td>
<td>-</td>
<td>20</td>
<td>3</td>
<td>2</td>
<td>-</td>
</tr>
<tr>
<td>Unknown</td>
<td>-</td>
<td>5</td>
<td>18</td>
<td>2</td>
<td>6</td>
</tr>
<tr>
<td>TOTAL</td>
<td>50</td>
<td>710</td>
<td>158</td>
<td>229</td>
<td>14</td>
</tr>
</tbody>
</table>

Table 30: Suburban Commercial Group Resource Consent Activity Status by Process 2000-2010

Overall, it can be observed that a significant proportion of the resource consents required were for matters other than to manage meaningful adverse effects on the environment. This draws into question these rule thresholds.

---

206 Subdivision consents have largely been excluded from this table.
207 Subdivision consents have largely been excluded from this table.
The effectiveness and efficiency of City Plan policies, rules, or other methods in achieving its objectives is summarised in Table 31.

<table>
<thead>
<tr>
<th>Objective</th>
<th>Effectiveness</th>
<th>Efficiency</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Outcome</td>
<td>Comment</td>
</tr>
<tr>
<td>4.4 Outdoor Advertising</td>
<td>Medium</td>
<td>Signs becoming more prevalent in the industrial environment, particularly at the interface with residential areas and viewed from public places.</td>
</tr>
<tr>
<td>7.6 Off street parking and loading</td>
<td>High</td>
<td>Off-street parking and loading facilities provided to meet commercial activity demands.</td>
</tr>
<tr>
<td>12.1 Distribution of Business Activity</td>
<td>Medium/High</td>
<td>Existing Local and District Centres are distributed throughout the City meeting community needs. However, need to provide new centres to meet community needs in new residential subdivisions is questionable.</td>
</tr>
<tr>
<td>12.7 Role of Suburban Centres</td>
<td>Medium/High</td>
<td>Need to provide for new local and district centres to meet community needs in new residential subdivisions is in question.</td>
</tr>
<tr>
<td>12.8 Amenity, design and effects of Suburban Centres</td>
<td>High</td>
<td>A high standard of amenity is generally being achieved.</td>
</tr>
<tr>
<td>12.9 Role of Retail park Areas</td>
<td>High</td>
<td>Large format retail park areas are provided.</td>
</tr>
</tbody>
</table>

Table 31: Summary of Effectiveness and Efficiency of the Suburban Commercial Group

Resulting from this evaluation, to increase effectiveness and efficiency, we recommend that:

1. Further consideration is given to whether the current wide range of traditional and more car orientated forms of commercial development, including the possible development intensity, are appropriate.

2. Further work is undertaken in relation to managing the interface between commercial areas and the surrounding environment, including the pressure for car-parking areas to be established out of zone on adjoining land.

3. Investigation is undertaken into why identified business areas in new resident Greenfield areas are not being developed for business activities and an appropriate City Plan response made.

4. Recognising the anticipated land use outcomes, individual rules relating to bulk and location of structures, signs, and the key transport related rules are reviewed to reduce the number of non-notified resource consents.
5.10.7 Addendum: Summary of the City Plan for the Suburban Commercial Group

**Objectives**

<table>
<thead>
<tr>
<th>City identity objective</th>
<th>Key Provisions</th>
</tr>
</thead>
<tbody>
<tr>
<td>A distinctive city where form, amenity and heritage values are maintained and enhanced.</td>
<td>AERS</td>
</tr>
<tr>
<td><strong>Transport Objective</strong></td>
<td>1. High standard of amenity, design and layout</td>
</tr>
<tr>
<td>An efficient, safe and sustainable transport system in the City which provides for ease of accessibility for people and goods.</td>
<td>2. Major commercial and community facilities within districts suburban centres</td>
</tr>
<tr>
<td>Business Objective</td>
<td>3. Efficient relationship of uses</td>
</tr>
<tr>
<td>A distribution, and diverse range, of business environments which meet the social and economic needs of the wider community, while avoiding, remedying or mitigating the potential adverse effects of their activities within the immediate area, and on the broader surrounding environment.</td>
<td>4. Progressive improvement in layout of local centres</td>
</tr>
<tr>
<td><strong>Specific objectives</strong></td>
<td>5. Range of pedestrian facilities and amenities in larger retail developments at suburban centres.</td>
</tr>
<tr>
<td>4.4 The provision for outdoor advertisements, whether temporary or otherwise, that does not detract from amenity values, does not have a detrimental impact upon natural and built heritage values, nor cause potential danger to public safety.</td>
<td>6. Public areas adequately supplied with sunlight and daylight</td>
</tr>
<tr>
<td>7.6 Sufficient and accessible off-street parking and loading facilities meeting the normal anticipated demands for each activity, while minimising the adverse effects of such facilities on the safety and efficiency of the transport system.</td>
<td>7. High standard of external building design and appearance</td>
</tr>
<tr>
<td>12.1 A distribution, scale and form of business activity which meets the economic needs of businesses, provides the community with convenient access to goods, services and opportunities for social interaction, and which:</td>
<td>8. Progressive establishment of service lanes</td>
</tr>
<tr>
<td>(a) is able to be efficiently serviced by infrastructure, including water, effluent disposal and roading;</td>
<td>9. Adequate carparking</td>
</tr>
<tr>
<td>(b) encourages in appropriate circumstances:</td>
<td>10. Some redevelopment for residential activity</td>
</tr>
<tr>
<td>• co-location of community services and facilities within the central city and district centres;</td>
<td>11. Respect amenity values of surrounding residential areas.</td>
</tr>
<tr>
<td>• consolidation of residential development around selected consolidation focal points;</td>
<td>12. Protection of the residential integrity of local residential streets</td>
</tr>
<tr>
<td>• accessibility, by a variety of modes of transport, to centres providing a wide range of public and private services and facilities; and</td>
<td>13. Minimisation of adverse effects on the environment</td>
</tr>
<tr>
<td>(c) manages the adverse effects of business activities on the environment, including:</td>
<td>14. Effective outdoor advertising that maintains amenity values and avoids adverse cumulative effects.</td>
</tr>
<tr>
<td>• maintaining or improving the safety and efficiency of the road network and related systems for all users (including public transport, pedestrians and cyclists), and minimising unnecessary trip generation;</td>
<td></td>
</tr>
<tr>
<td>• maintaining the amenity of residential and other sensitive environments (including local roads);</td>
<td>Zone description and purpose</td>
</tr>
<tr>
<td>• ensuring the function, vitality and amenity of those existing centres that provide a wide range of public and private services and facilities to the community will not be significantly affected by new retail activity;</td>
<td><strong>Business 1 (Local Centre/District Centre Fringe) Zone</strong></td>
</tr>
<tr>
<td></td>
<td>Provides for local opportunities for employment, community activities and convenient (often pedestrian) access to goods and services</td>
</tr>
<tr>
<td></td>
<td><strong>Business 2 (District Centre Core) Zone</strong></td>
</tr>
<tr>
<td></td>
<td>Provides for building development of significant scale and intensity appropriate to its function and the communities of any living environment in the adjoining zone. Contains core of business activity within a district Centre and important community facilities</td>
</tr>
<tr>
<td></td>
<td><strong>Business 2P (District Centre Parking) Zone</strong></td>
</tr>
<tr>
<td></td>
<td>Specialist zone securing parking provisions and to act as a buffer for residential areas</td>
</tr>
<tr>
<td></td>
<td><strong>Business RP (Retail Park) Zone</strong></td>
</tr>
<tr>
<td></td>
<td>Provides for large format retail centres predominately accessed by private motor vehicles, with retail activities sustaining the central city and district centres being discouraged</td>
</tr>
<tr>
<td><strong>Zone AERS</strong></td>
<td><strong>Business 1 (Local Centre/District Centre Fringe) Zone</strong></td>
</tr>
<tr>
<td></td>
<td>Generally small-scale commercial buildings</td>
</tr>
<tr>
<td></td>
<td>Lower levels of parking</td>
</tr>
<tr>
<td></td>
<td>Noise outcomes consistent with adjacent living zones</td>
</tr>
<tr>
<td></td>
<td>High site coverage with limited open space, on-site car parking and landscaping</td>
</tr>
<tr>
<td></td>
<td>Limited future expansion leading to the loss of residential housing stock</td>
</tr>
<tr>
<td></td>
<td>Community activities and residential occupation in conjunction with retail activities above ground floor level</td>
</tr>
<tr>
<td></td>
<td><strong>Business 2 (District Centre Core) Zone</strong></td>
</tr>
<tr>
<td></td>
<td>Numerous small retail shops with at least one large floorspace retail activity</td>
</tr>
<tr>
<td></td>
<td>High levels of traffic generation</td>
</tr>
<tr>
<td></td>
<td>Noise outcomes consistent with adjacent living zones</td>
</tr>
<tr>
<td></td>
<td>Large-scale commercial buildings and especially car parking, with landscaping and setbacks</td>
</tr>
<tr>
<td></td>
<td>Further development of some centres</td>
</tr>
<tr>
<td></td>
<td>Residential occupation particularly above ground floor level</td>
</tr>
<tr>
<td></td>
<td>Wide range of business activities and community facilities and services</td>
</tr>
</tbody>
</table>
and

- minimising contamination, pollution, odour, hazardous substances, noise and glare.

12.7 Suburban centres that enable people and communities within the City to satisfy their requirements for goods and services, recreation, and opportunities for interaction.

12.8 A high standard of amenity, design and layout in suburban centres, whilst minimising adverse effects resulting from their development and activities.

12.9 Provision for large format retail park areas to enable people and communities to meet their social and economic needs, where these activities:

(a) are compatible with the overall distribution, scale and form of existing commercial activity within the city;

(b) avoid adverse effects, including effects upon:

(i) the safety and efficiency of the classified road network to meet present and future transport needs;

(ii) the function and amenity of district centres and the central city; and

(iii) neighbouring zones;

(c) improve amenity and the street environment; and

(d) recognise that access is principally by private motor vehicle

<table>
<thead>
<tr>
<th>Business 2P (District Centre Parking) Zone</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Adequate ground level car parking associated with key district centres</td>
</tr>
<tr>
<td>2. Acts as a buffer to adjoining residential areas</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Business RP (Retail Park) Zone</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Large-scale commercial buildings with expenses areas of associated car parking, open space and landscaping</td>
</tr>
<tr>
<td>2. Moderate levels of traffic generation</td>
</tr>
<tr>
<td>3. Integration of retail land uses with an efficient strategic transport network</td>
</tr>
<tr>
<td>4. The noise outcomes consistent with adjacent living zones</td>
</tr>
<tr>
<td>5. Large format retail precincts complex and shopping choice to the central city and district centres</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Policy areas</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Distribution of suburban centres</td>
</tr>
<tr>
<td>2. Activities</td>
</tr>
<tr>
<td>3. Business parking areas</td>
</tr>
<tr>
<td>4. Consolidation</td>
</tr>
<tr>
<td>5. Comprehensive development</td>
</tr>
<tr>
<td>6. Public amenities</td>
</tr>
<tr>
<td>7. Daylight and sunlight</td>
</tr>
<tr>
<td>8. Building appearance</td>
</tr>
<tr>
<td>9. Service lanes</td>
</tr>
<tr>
<td>10. Cash in lieu of parking</td>
</tr>
<tr>
<td>11. Parking requirements</td>
</tr>
<tr>
<td>12. Accessible parking</td>
</tr>
<tr>
<td>13. Residential development</td>
</tr>
<tr>
<td>14. Residential amenity</td>
</tr>
<tr>
<td>15. Buffers</td>
</tr>
<tr>
<td>16. Residential streets</td>
</tr>
<tr>
<td>17. Effects on amenity</td>
</tr>
<tr>
<td>18. Ferrymead 'mixed-use' centre</td>
</tr>
<tr>
<td>19. Range of activities</td>
</tr>
<tr>
<td>20. Amenity</td>
</tr>
<tr>
<td>21. Amenity values</td>
</tr>
</tbody>
</table>
5.11 Suburban Living

5.11.1 Summary

The primary focus of the City Plan with respect to the suburban living area is to achieve a residential environment consisting of low to medium density permanent living, with high amenity values characterised by open space and landscaped gardens. While the City Plan generally specifies the characteristics of the suburban living area leading to high amenity values, this lacks detail and it is difficult to apply on a site by site and neighbourhood basis.

The City Plan is of high effectiveness in maintaining the overall dominance of residential activity in the suburban living area. However, residential coherence is being eroded in specific locations, particularly in relation to those located along arterial and collector roads. In these locations development pressure exists for a range of non-residential activities, including travellers’ accommodation and home occupations.

The City Plan is of questionable effectiveness in maintaining the desired characteristics and amenity values derived from built form in the suburban living area. Where development is occurring within the existing built environment, there is an observable intensification of development as a result of site sizes reducing, development potential being maximised and elderly person housing projects. This is resulting in hard surfaces becoming more dominant and private green space diminishing.

There is evidence this is occurring in similar absolute numbers within the Living 1 Zone as the Living 2 zones, whereas the City Plan anticipates such intensification will be focused within the Living 2 Zone.

The City Plan is of less than optimum efficiency. There are a high number of resource consents being required for residential activities. These are typically granted on a non-notified basis. It draws into question whether there is sufficient benefit derived from these processes to warrant the cost.

It is recommended that:

1. Within the City Plan’s objectives and policies the physical characteristics of the suburban living environment anticipated are more clearly stated.

2. The appropriateness of the amount and form of residential intensification is reviewed; including considering rules relating to minimum site size, landscaping, hard surfaces, street scene (including fencing) and elderly persons housing.

3. The individual rules relating to the bulk and location of structures are reviewed to reduce the number of non-notified resource consent applications, particularly within or internal to a single, multi unit development. These rules include those relating to; open space, living space, continuous building length, recession planes and building separation.

4. The type and amount of non-residential development occurring is reviewed, particularly in relation to tourist accommodation, small service/office activities and home occupations.

5. Individual rules are reviewed in order to determine if they are necessary, and if so increase certainty in the way they are to be interpreted, including: the continuous building length rule (complexity and difficult to interpret consistently), outdoor living space rule (difficulty confirming compliance), traffic generation rule (overlap and difficulty in confirming compliance), queuing space (not being applied in a residential context, but drafted so that it does), aircraft noise expose (only identified at building consent stage) and application of retaining walls (interpretive difficulties).

6. Consideration is given to rationalising the number of Suburban Living Zones when multiple zones are achieving similar outcomes.
5.11.2 Introduction

The suburban living area incorporates the majority of the areas of Christchurch City where people reside. To provide context, at the start of the monitoring period within the Suburban Living area there were approximately 88,000 dwellings\(^{208}\). This compares to approximately 126,500 dwellings in City as a whole\(^{209}\).

The suburban living area is made up of a number of areas zoned in the City Plan for lower density living purposes (see Figure 31). It is predominately made up of the Living 1, Living 2 and Living Hills zones\(^{210}\).

The primary City Plan living objective is a quality living environment that meets the needs of the City’s population\(^{211}\). In summary, in these locations the City Plan anticipates that:

1. The predominant land use is residential with a very limited provision of non-residential activities and then only where residential coherence is maintained.

2. The character of this area is derived from low to medium density residential activities creating high residential amenity. There is open space and tree planting. Larger section sizes provide for all the components of the residential activities being accommodated on-site\(^{212}\). An open street scene is maintained. There is a diversity in building design. Improvements and replacement of the existing building stock is expected.

3. The built form is low scale and contained within independent sites with buildings positioned to provide for significant on-site landscaping. Reasonably generous separation to neighbouring properties is maintained, together with access to daylight.

In this section; contextual information is provided using different data sources, outcomes from interviews with key City Council staff with in-depth knowledge of the City Plan are recorded, effectiveness is considered, then efficiency, the main findings are then summarised, and finally an addendum is included summarising the relevant City Plan provisions.

\(\text{Figure 31: Geographical Extent of the Suburban Living Group}\)

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\(^{208}\) Dwelling count from the 2001 Census

\(^{209}\) http://resources.ccc.govt.nz/files/11_AER1_1697_ChristchurchDwellingType-docs.pdf

\(^{210}\) The complete list of zones is: Living 1 (Outer Suburban), Living 2 (Inner Suburban), Living H (Hills), Living TMB (Taylor Mistake Bach), Living RS(Rural Settlement), Living RV (Rural Village), Living 1A (Outer Suburban Boundary), Living 1B (Rural-Living), Living 1D (Outer Suburban-Sparks Rd), Living 1E (Rural Hamlet-Gardiners Rd), Living HA (Hill Boundary), Living HB (Very low Density) BUT excluding Special Amenity Areas.

\(^{211}\) Volume 2, Section 11

\(^{212}\) e.g. parking, service areas.
5.11.3 Context for the Evaluation

An overview of the contextual information relating to the suburban living area is provided in Table 32.

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>No. ²¹⁴</td>
<td>%²¹⁵</td>
<td>No.</td>
<td>%</td>
</tr>
<tr>
<td>North west</td>
<td>23200</td>
<td>26</td>
<td>2810</td>
<td>23</td>
</tr>
<tr>
<td>North east</td>
<td>23000</td>
<td>26</td>
<td>3610</td>
<td>30</td>
</tr>
<tr>
<td>South east</td>
<td>10200</td>
<td>12</td>
<td>940</td>
<td>8</td>
</tr>
<tr>
<td>South west</td>
<td>19200</td>
<td>22</td>
<td>2750</td>
<td>23</td>
</tr>
<tr>
<td>Port Hills</td>
<td>6900</td>
<td>8</td>
<td>1550</td>
<td>13</td>
</tr>
<tr>
<td>Inner city</td>
<td>5600</td>
<td>6</td>
<td>370</td>
<td>3</td>
</tr>
<tr>
<td>TOTAL</td>
<td>88100</td>
<td></td>
<td>12030</td>
<td></td>
</tr>
</tbody>
</table>

Table 32: Contextual Information for the Suburban Living Group

From this table it is observed:

1. In the period 2000 to 2010, a significant number of building consents were sought and new parcels created, indicating the suburban living area experienced a significant level of residential growth (at least 14% increase in the number of dwellings).

2. Numerically the building consents were largely located in the north-east, north-west and south-west quadrants of the City. However when compared with the number of existing dwellings existing at 2001, proportionally a slightly higher number occurred in the north east and port hills parts of the City, and lower proportions in the inner city, north west, and south east.

3. A significant number of properties were the subject of resource consent applications. Proportionally, more of these related to properties on the port hills.

5.11.4 Interviews with City Council Staff

We interviewed key staff from plan policy and plan administration. The focus of the interviews centred around four matters:

1. The effect of non-residential activity on the over dominance of residential land use

2. Changes in residential character

3. Changes in built form and intensity of development

4. Workability of parts of the City Plan.

²¹³ The number are likely to represent an under count as in some instances a building consent provides for multiple dwellings.
²¹⁴ Rounded
²¹⁵ Calculated using non rounded numbers
5.11.4.1 Residential land use

There are a limited number of non-residential activities occurring, with no observable trend or demand for non-residential activities establishing within community footprints as the City Plan anticipates. Where these activities are occurring it is primarily along arterial and collector roads. This is due to sites having higher visibility (exposure) and easier accessibility than local streets. Further, existing City Plan rules direct non-residential activities to establish on sites fronting arterial and collector roads\footnote{For example, the residential coherence rule.}. One example is traveller’s accommodation (e.g. motels). These are having a significant impact on residential amenity values as a result of an intensive built form, large areas of hard surfaces, and the associated signage. This is particularly the case where a number of these activities occur in close proximity\footnote{For example, Riccarton Road.}.

The scale and location of anticipated non-residential activities (e.g. medical facilities, pre-schools) appears to be largely consistent with expectations. The one exception is a growing trend in the establishment of small scale ‘home based’ business activities within dwellings as a permitted activity in parts of the City\footnote{For example, Memorial Avenue, Papanui Road.}. This activity is resulting in a change to predominant residential activity in a way not consistent with the outcomes expected in the City Plan. Reasons for this include provision of signage, increased impervious surfaces and additional on-site car-parking at the expense of landscaped and planted areas in the front yard. Together these are resulting in an intensification of hard surfaces directed towards the streetscape, drawing particular attention to the presence of the non-residential activities. On a site-by-site basis, the relatively small size and intensity of such activities are insignificant. However, where activities develop in close proximity, cumulatively there is an observable increase in hard stand area and a reduction in landscaped and planted areas.

5.11.4.2 Residential character

Residential character is changing over time. Historically, section sizes were larger, dwellings smaller and significant open space existed. Currently, larger dwellings on smaller sections are occurring as it is increasingly common to maximise the development potential of a site. This is seen through:

1. The infill process where the existing single storey dwelling remains\footnote{Generally existing garage towards rear of section is removed and new garage located at the front of the section adjacent to the street.} and a large one or two storey dwelling being established towards the rear of the section. Often this is accompanied by a resource consent application for internalised non-compliances\footnote{For example recession plane, building setback, open space requirement where written approval where the developer will give themselves written approval for non-compliances and therefore cannot be considered affected.}.

2. Sections being cleared (existing house removed/demolished) and replaced with two new dwellings often with an accompanying resource consent application for internal non-compliances. This has also resulted in a change in the age and type of housing stock in different parts of the City.

This is leading to larger areas of hard surfaces and a commensurate reduction in landscaped and/or planted areas. These are matters the City Plan does not directly control. In addition, large, solid fences on arterial and collector roads\footnote{Fendalton Road} are also influencing residential character. This creates a barrier, influencing residential streetscape, both visually and physically.

Elderly persons housing is occurring throughout the city. The current City Plan rule package\footnote{No density requirement, higher site coverage requirement, reduced open space requirement.} enables a more intensive form of development, particularly given the relaxation of open space
requirement and site coverage. Approved resource consent applications are increasing the size of elderly persons housing resulting in an intensity of built form and hard surface that is incongruent with the typical development pattern in these living areas. This is influencing the overall character of the neighbourhoods elderly person housing is establishing in.

The intensity of development occurring is generally consistent with residential outcomes sought in the City Plan. While high numbers of resource consents were being sought for additional development in some historically and spatially specific zones, this is an exception rather than the norm.

5.11.4.3 Built form

The bulk and location rules are viewed as being tested, tried and proven. However these provisions are being challenged by changes in lifestyle and market demands, creating pressure to realise maximum site development potential. There is perceived to be a deliberate designing of non-compliances into comprehensive developments on the basis that potential adverse effects are internalised with the development. This brings into question the ability of bulk and location rules to achieve anticipated environmental outcomes.

5.11.4.4 City Plan implementation

Individual rules are problematic from an implementation perspective. These rules include: the continuous building length rule (complexity and difficult to interpret consistently), outdoor living space rule (difficulty confirming compliance), traffic generation rule (overlap and difficulty in confirming compliance), queuing space (not being applied in a residential context, but drafted so that it does), aircraft noise expose (only identified at building consent stage) and application of retaining walls (interpretive difficulties).

The definition of residential unit is causing implementation issues as it applies to student accommodation. A number of proposed developments have sought larger (5 plus bedrooms) dwellings, including significant ‘sleep outs’. Often ‘sleep outs’ contain toilets and showers and bench space with a sink and power points. This clearly points to an additional self contained living accommodation unit, but is not defined in the City Plan in this manner.

5.11.5 Effectiveness

The effectiveness of the City Plan is determined by how well it controls development in order to achieve a predominately residential land use, residential character resulting in high amenity values, and low-scale and density built form outcomes.

5.11.5.1 Residential land use

Within the suburban living area the predominant land use anticipated within the City Plan is residential, with very limited provision for non-residential activities and only when residential coherence is maintained.

Only a low number of resource consent non-compliances related to non-residential activities (~3% or 600), of which multiple listed non-compliances are likely to occur in relation to individual developments. This is reinforced by the very low number of building consents (~148) for other activities with an estimated value of $40,000 or greater. Therefore, overall there is limited evidence in the suburban living area of the predominance of residential activities reduced or lost.

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223 For example, site coverage non-compliances in the Rural Living Zone
224 For all activities other than relating to dwellings
225 Used to indicate new activities or significant renovations
However, interviews suggest that this low number may under represent the degree of influence non-residential activity is having on residential coherence for two reasons. Firstly, the non-residential activity is likely to be geographically concentrated, particularly in relation to high traffic carrying roads in proximity to centres of activities (i.e. motel units on Riccarton Road) leading to potential adverse cumulative effects on residential coherence. Secondly, the data does not include the permitted change associated with home occupation. Picture 21 depicts a typical example of this permitted change.

5.11.5.2 Residential character

The residential character anticipated within the City Plan for the suburban living area consists of high residential amenity, with larger section sizes providing for all the components of the predominant residential activities being accommodated on-site. An open street scene is to be maintained. There is a diversity in building design, with improvements and replacement of the existing building stock.

Between 2000 and 2010 a significant number of new land parcels were created. Predominately the new land parcels fell between 350 m² and 850 m² in size. Focussing on the City Plan density thresholds for the Living 1, 2 and Hills zones, it can be seen from Figure 32 there is a density differentiation, moving from the medium density Living 2 Zone through to the low density Living Hills Zone. However, in absolute terms a similar number of new parcels were created between 350 m² and 450 m² in area in the Living 1 (730) and Living 2 (810) zones. While the Living 2 Zone thresholds (minimum of 330m² and average of 350 m²) anticipates these parcels sizes, generally the Living 1 zone rule thresholds (minimum of 450m² and average of 550 m²) do not. Therefore, there is a blurring of the differentiation between the different density characteristics of these zones. It is also a pointer to the preferred location of medium intensity development with no clear preference for the Living 2 Zone as would be anticipated from the city Plan. This is supported by the resource consent non-compliances, with 69% (450) of the granted resource consents for density occurring in the Living 1 Zone.

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226 Code: LIDEN.
227 Note within the Living 1 Zone, only 3 (out of a total of the 4 for all the suburban living area) resource consents with a density non-compliance were declined between 2000 and 2010.
The resource consent non-compliances for matters other than density reveal one further pressure on residential character. There are a significant number of street scene resource consent non-compliances\textsuperscript{228}. In all 2160 resource consents were granted for this non-compliance (and only 2 refused) amounting to approximately 10\% of all the non-compliances in the suburban living area. These predominately occurred in the Living 1, 1A, 2 and Hills zones. There is no pattern that can be in the street addresses or general location of the non-compliances. Overall, this non-compliance is frequent and wide spread, with no identifiable common reasons.

From our field observations, this non-compliance is changing the contribution properties are making to street scene. In general terms, where fences do not dominate, buildings (generally garaging) is moving into the front yard, and associated with this is a reduction of vegetation and an increase in hard standing surfaces. Picture 22 depicts a typical example of this. It is not uncommon for a number of instances of this change to be present in a single street.

Of the other matters examined (thresholds relating to health and safety matters, heritage, signs and trees) there is little evidence of wide spread reduction or loss of residential character.

Finally, there are approximately 5400 building consents granted for alterations of dwellings with an estimated work value of $10,000 or greater. The geographic pattern of these is different to new dwellings. When compared with the distribution of dwellings existing at 2001, a greater proportion of alterations occur in the north -west and inner city, and lesser proportion in the north -east and south -east. Therefore, the maintenance and upgrading of the existing building stock is occurring, albeit in a more significant way in some parts of the City than others.

5.11.5.3 \textit{Low-scale built form}

The built form anticipated by the City Plan consists of low scale buildings contained within their own sites, with buildings positioned to provide for significant on-site landscaping and appropriate separation and daylight to neighbouring properties.

Overall, the number of resource consent non-compliances relating to built form is highly significant, representing 45\% (10,290) of all the non-compliances, particularly when only twelve (12) resource consents with these non-compliances are entered as being declined. Of the total number of non-compliances, 57\% (5850) relate to the relationship between development to adjoining sites\textsuperscript{229} 25\% (2540) to the internal organisation of open space and outdoor living space of the subject site\textsuperscript{230}, and a further 15\% (1520) to matters relating to the appearance of the building associated with continuous building length\textsuperscript{231}. Again, within the data there is no observable pattern from the street.

\begin{itemize}
\item \textsuperscript{228} Code: LISTR.
\item \textsuperscript{229} Recession planes (LIREC) and separation (LISEP).
\item \textsuperscript{230} Codes LIOLS and LIOPE.
\item \textsuperscript{231} Code LICON.
\end{itemize}
addresses or general location of these non-compliances. Again, non-compliance with these rules is common, wide spread and there is no single set of circumstances triggering non-compliance.

Often these built form non-compliances occur in combination with each other. It is not unusual for a single address to have recession plane, separation and/or continuous building length non-compliance recorded against the same resource management number.

Based on our interviews, these non-compliances are often contained within individual properties in a single development at the time of single ownership. This allows the single owner to provide the necessary written approvals at time of resource consent, reducing the ability of the consent authority to consider the effects on the affected property.

From our field observations, these non-compliances result in a built form that dominates individual sites and results in a closer relationship with adjoining sites. As a result, hard surfaces become more apparent, with areas of vegetation being deemphasised. Picture 23 is a typical example of this.

Non-compliances for height are relative low, being approximately 3% (310) of the resource consent non-compliances within this category. However, there is an observable pattern as to the location of those non-compliances, with 75% (~230) occurring within the Living Hills Zone, all of which were granted. This may simply reflect the difficulty in establishing height thresholds for changing topography.

5.11.6 Efficiency

Within the suburban living area, between 2000 and 2010 there were a combined total of 17,700 building consents for new dwellings, alterations to dwellings in excess of $10,000 in value, and non-residential building consents in excess of $40,000. This compares with 11,680 properties subject to resource consents in this period. While these numbers are not strictly comparable, a significant proportion of development is requiring resource consent.
It is difficult to accurately gauge the efficiency of the City Plan provisions which result in these resource consent processes. However, the resource consent process used and the outcome of that process are indicators of efficiency. Table 33 summarises this for all resource consent non-compliances across the Suburban Living Group.

<table>
<thead>
<tr>
<th>Process</th>
<th>Granted</th>
<th>Declined</th>
<th>Not known</th>
<th>TOTAL</th>
</tr>
</thead>
<tbody>
<tr>
<td>Non notified</td>
<td>20740</td>
<td>10</td>
<td>60</td>
<td>20810</td>
</tr>
<tr>
<td>Service</td>
<td>430</td>
<td>20</td>
<td>0</td>
<td>450</td>
</tr>
<tr>
<td>Notified</td>
<td>430</td>
<td>50</td>
<td>0</td>
<td>480</td>
</tr>
<tr>
<td>Not known</td>
<td>580</td>
<td>10</td>
<td>290</td>
<td>880</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>22180</strong></td>
<td><strong>90</strong></td>
<td><strong>350</strong></td>
<td><strong>22620</strong></td>
</tr>
</tbody>
</table>

Table 33: Resource Consent Process by Outcome 2000 - 2010

The non-notified row is significant. This represents those non-compliances that the effects on the environment were considered (largely during the study period) insignificant.

Table 34 does show that more non-complying activities were publicly notified than any other category of activity status. It also demonstrates that applicants choose to breach the development standard more frequently than the community and critical standards.

<table>
<thead>
<tr>
<th>Process</th>
<th>Controlled</th>
<th>Limited discretionary</th>
<th>Discretionary</th>
<th>Non complying</th>
<th>Unknown</th>
</tr>
</thead>
<tbody>
<tr>
<td>Non notified</td>
<td>2244</td>
<td>12386</td>
<td>2382</td>
<td>3674</td>
<td>68</td>
</tr>
<tr>
<td>Service</td>
<td>-</td>
<td>210</td>
<td>119</td>
<td>127</td>
<td>-</td>
</tr>
<tr>
<td>Notified</td>
<td>-</td>
<td>48</td>
<td>161</td>
<td>263</td>
<td>3</td>
</tr>
<tr>
<td>Unknown</td>
<td>-</td>
<td>121</td>
<td>121</td>
<td>133</td>
<td>223</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>2244</strong></td>
<td><strong>12765</strong></td>
<td><strong>2783</strong></td>
<td><strong>4197</strong></td>
<td><strong>294</strong></td>
</tr>
</tbody>
</table>

Table 34: Suburban Living group Resource Consent Activity Status by Process 2000 - 2010

Overall, it can be observed that a significant proportion of the resource consents required are for matters other than, at the time the application is determined, to manage meaningful adverse effects on the environment. This may be because the minor nature of the non-compliances with the City Plan rules, applicants obtaining written approvals, or the non-compliances being internalised within a development. However, these developments are routinely deemed as to have less than minor adverse effects on the environment and to be appropriate within their individual context. As such, it draws into question whether there is sufficient benefit derived from these processes to warrant the cost.

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232 Subdivision consents have largely been excluded from this table.
233 Subdivision consents have largely been excluded from this table.
5.11.7 Summary of Effectiveness and Efficiency

The effectiveness and efficiency of City Plan policies, rules, or other methods in achieving its objectives is summarised in Table 35.

<table>
<thead>
<tr>
<th>Objective</th>
<th>Effectiveness</th>
<th>Efficiency</th>
</tr>
</thead>
<tbody>
<tr>
<td>10.3 Amenity values</td>
<td>Unknown, but probably medium</td>
<td>Infill development is resulting in the loss of open space and private green space, and significant hard surfaces. However, the City Plan is unclear in the outcome sought.</td>
</tr>
<tr>
<td>11.1 Diverse living environments</td>
<td>Medium</td>
<td>Intensity of development is blurring the distinction Living 1 and 2 zones.</td>
</tr>
<tr>
<td>11.2 Housing needs</td>
<td>High</td>
<td>Diversity of housing is occurring which is assumed to meet needs.</td>
</tr>
<tr>
<td>11.3 Non-residential activities</td>
<td>High</td>
<td>Some evidence of lower effectiveness at discrete locations.</td>
</tr>
<tr>
<td>11.4 Adverse environmental effectiveness</td>
<td>Medium</td>
<td>Infill development is resulting in the loss of open space and private green space, and significant hard surfaces.</td>
</tr>
<tr>
<td>11.5 External appearance</td>
<td>Medium</td>
<td>Scale, intensity and design of development is resulting in a more intense built environment than may be anticipated</td>
</tr>
<tr>
<td>11.6 Neighbourhood improvement</td>
<td>Medium to High</td>
<td>Reinvestment in suburban living areas is occurring, but not evenly distributed.</td>
</tr>
</tbody>
</table>

Table 35: Summary of Effectiveness and Efficiency of the Suburban Living Group

In order to increase effectiveness and efficiency, we recommend that:

1. Within the City Plan’s objectives and policies the physical characteristics of the suburban living environment anticipated are more clearly stated.
2. The appropriateness of the amount and form of residential intensification is reviewed; including considering rules relating to minimum site size, landscaping, hard surfaces, street scene (including fencing) and elderly persons housing.
3. The individual rules relating to the bulk and location of structures are reviewed to reduce the number of non-notified resource consent applications, particularly within or internal to a single, multi unit development. These rules include those relating to; open space, living space, continuous building length, recession planes and building separation.
4. The type and amount of non-residential development occurring is reviewed, particularly in relation to tourist accommodation, small service/office activities and home occupations.
5. Individual rules are reviewed in order to determine if they are necessary, and if so increase certainty in the way they are to be interpreted, including: the continuous building length rule (complexity and difficult to interpret consistently), outdoor living space rule (difficulty confirming compliance), traffic generation rule (overlap and difficulty in confirming compliance), queuing space (not being applied in a residential context, but drafted so that it does), aircraft noise expose (only identified at building consent stage) and application of retaining walls (interpretive difficulties).
6. Consideration is given to rationalising the number of Suburban Living Zones when multiple zones are achieving similar outcomes.
### 5.11.8 Addendum: Summary of the City Plan for the Suburban Living Group

<table>
<thead>
<tr>
<th>Living Objective</th>
<th>Key AERS</th>
</tr>
</thead>
<tbody>
<tr>
<td>A quality living environment that meets the differing needs of the City's population</td>
<td>Volume 2 Section 11 Living</td>
</tr>
<tr>
<td><strong>Specific objectives</strong></td>
<td></td>
</tr>
<tr>
<td>10.3 That the amenities of the built environment be maintained or enhanced through the subdivision process, and that the operation of the infrastructure, and the cost of its provision, not be adverse affected by subdivision proposals.</td>
<td>1. Maintenance of a general suburban character and amenity</td>
</tr>
<tr>
<td>11.1 A diversity of living environments based on the different characteristics of areas of the City.</td>
<td>2. Diversity of housing types</td>
</tr>
<tr>
<td>11.2 Opportunities for housing that meets the needs of all socio-economic groups, Tangata Whenua, and groups requiring specialised housing accommodation.</td>
<td>3. Public awareness and involvement in planning</td>
</tr>
<tr>
<td>11.3 Non-residential activities located within the living areas which meet community needs, and are consistent with maintaining a high standard of amenity in living areas.</td>
<td>4. Pattern of subdivision complimentary and appropriate to the character of the land uses anticipated</td>
</tr>
<tr>
<td>11.4 A living environment that is pleasant and within which adverse environmental effects on amenity values are avoided remedied or mitigated, while still providing the opportunity for individual and community expression.</td>
<td></td>
</tr>
<tr>
<td>11.5 Good quality building and site designed to achieve a high level of amenity throughout the living areas of the City.</td>
<td></td>
</tr>
<tr>
<td>11.6 The conservation and enhancement of living areas and the improvement, and where appropriate, replacement of existing housing.</td>
<td></td>
</tr>
</tbody>
</table>

**Zone description and purpose**
- Principally for low and low-and medium density permit living accommodation. Open space and landscaped gardens comprise an essential component of the environment.

**Zone AERS**
- Buildings are surrounded by, and balanced with, generous areas of open space
- Buildings at low densities of building coverage and low heights (generally 1-2 stories), but with a variety of building design and style
- Maintenance and enhancement of an open street scene
- High level of on-site amenity
- Maintenance of residential coherence
- Non-residential activities limited to those which are of a compatible scale
- A gradual lowering of residential densities to the rural zone boundary

**Policy areas**
- Character
- Density
- Building height
- Rural-residential living
- Comprehensive housing improvement areas
- Taylors Mistake Baches
- Clear water residential units
- Permanent living accommodation
- Elderly persons housing
- Family flats
- Emergency housing
- Local community facilities and services
- Metropolitan facility and services
- Home-based employment
- Service stations and taverns/hotels
- Open space
- Sunlight
- Privacy and outlook
- Services
- Parking
- Noise
- Glare
- Street scene
- Scale
6 EVALUATION OF THE SIMPLE GROUPS

6.1 Introduction

The simple evaluation groups are those groups of City Plan provisions which relate to: matters of strategic importance to the overall outcomes of the City Plan, but for which the existing work programmes of the City Council already provide insight into effectiveness and efficiency; or matters which are specialised, without a strong spatial element. As a result, determining effectiveness and efficiency can be achieved by a more simple evaluation.

The simple evaluative groups relate to:

1. Deferred Living
2. Ecological Protection
3. Fill/Excavation Grouping
4. Land Contamination
5. Medium and High Density Living
6. Tangata Whenua and Cultural
7. Travellers Accommodation
8. Utilities

In the section that follows, under the heading of each group:

1. The outcomes of evaluation of the group is summarised.
2. The group is introduced, including the relevant City Plan provisions and the anticipated outcomes from the implementation of those provisions.
3. Effective and efficiency is evaluated together.
4. The effectiveness and efficiency of the provisions in relation to each relevant objective is summarised, together with any recommendations.
5. An addendum is provided setting out the detail of the relevant provisions.
6.2 Deferred Living

6.2.1 Summary

The primary focus of the City Plan with respect to the deferred living group is to avoid the development of land identified as suitable for living purposes until a specified time period has elapsed or events occurred. The City Plan uses two deferral techniques, being the deferred zone or special purposes zone (at South Halswell). Within these areas a more restrictive, generally rural, zone is applied in the interim.

The City Plan is effective and efficient in deferring development of land for living purposes. There has been very little development activity within the deferred living group, and what activity has occurred is either in accordance with the deferral mechanism, or discrete and isolated.

It is recommended that the City plan is updated where the deferral is no longer being implemented.

6.2.2 Introduction

The deferred living area incorporates those parts of the City identified as generally been suitable for development for living purposes, but for various reasons this cannot occur until a period of time has elapsed and/or an event has occurred.

There are two types of deferral mechanisms within the City Plan:

1. Deferred living zones.
2. The Special Purpose (South Halswell) Zone.

In effect, both types of planning techniques apply another (more restrictive, generally rural) zone until the time period or event has occurred.

In this section: outcomes from interviews with key City Council staff are recorded; using these interviews, available data and site visits, effectiveness and efficiency is considered; the main findings and recommendations are set out, and finally an addendum is included summarising the relevant City Plan provisions.

6.2.3 Interviews with City Council staff

City Council staff are experienced in working with and implementing the City Plan in relation to deferred living zones. We interviewed key staff from plan policy and plan administration.

Overall, staff are of the view that the deferred living zone approach is successful. Generally the constraint to be overcome before development could occur was generally infrastructural. This was generally demonstrated to be overcome or addressed through the subdivision process. It was envisaged that the redundant deferred zoning rules and planning maps would be updated at time of City Plan review.

234 For example, the provision of additional infrastructure capacity.
235 Living HA Deferred Zone on Planning Map 59A (Kennedys Bush/Cashmere Road), Living HA Deferred 2008 Zone on Planning Map 59A and defined in Appendix 8, Part 2, (Kennedys Bush/Cashmere Road), Living 1A Deferred Zone on Planning Maps 30, 36, 37 (Yaldhurst), , Living HA Deferred Zone on the Planning Map 55A (Heathcote Valley), Living HA Deferred Zone or Living 1A Deferred Zone on Planning Maps 53A and 60A and defined in Appendix 3i, Part 2 (Cashmere and Worsley), Living HA Deferred Zone on Planning Map 55A (Moncks Spur/Mt. Pleasant Road).
236 Other Special Purpose Zones were excluded as they are included in the City Plan primarily for different purposes.
6.2.4 Effectiveness and Efficiency

The effectiveness and efficiency of the City Plan is determined by how well, and at what cost, it controls development in order to avoid the development of these areas for living purposes until the require time period has past or the specified event has occurred.

There has been very little development activity within the deferred living group\textsuperscript{237}. Table 36 summarises that activity.

Only the Living 1 Deferred Zone located on Johns Road has been developed for living purposes\textsuperscript{238}. This area was the subject to Variation 92, which became operative on 21 September 2006. All the building consents were granted after this date (in 2009 and 2010). Staff are of the view that the reasons for the deferral are overcome and hence the deferral no longer applies.

A review of the description of the resource consent data, together with the assigned activity status, and outcome, indicates that:

1. A small level of isolated subdivision activity occurred. This is likely to be in accordance with the default (typically rural) zone provisions, rather than being unanticipated development in accordance with the living zone.

2. None of the resource consent applications in the deferred living area were refused.

Overall, the evidence is that the City Plan provisions relating to the deferred living group are effective, and that the efficiency of these provisions is largely unchanged since they were introduced into the City Plan.

6.2.5 Summary of Effectiveness and Efficiency

The effectiveness and efficiency of City Plan policies, rules, or other methods in achieving its objectives is summarised in Table 37.

<table>
<thead>
<tr>
<th>Objective</th>
<th>Effectiveness</th>
<th>Efficiency</th>
</tr>
</thead>
<tbody>
<tr>
<td>6.3 Periurban growth</td>
<td>High</td>
<td>The deferral has avoided development that is inappropriate until the listed constraints are overcome.</td>
</tr>
<tr>
<td>11.1 Diverse living environments</td>
<td>Low to medium</td>
<td>Deferral has been removed from only a small amount of land since 2000.</td>
</tr>
<tr>
<td>11.4 Adverse environmental effects</td>
<td>High</td>
<td>The deferral has avoided development that is inappropriate until the listed constraints are overcome.</td>
</tr>
</tbody>
</table>

Table 37: Summary of Effectiveness and Efficiency of the Deferred Living Group

\textsuperscript{237} To put this in context, in 2009 there was approximately 165ha of deferred living zone within the City (CCC, Indicator Reporting Sheet, Vacant Residential Land, October 2009)

\textsuperscript{238} Brookwater Avenue and Marble Court
Resulting from this evaluation, it is recommended that the city Plan is updated to reflect those locations where the deferral is no longer being implemented.

6.2.6 Addendum: Summary of the City Plan for the Deferred Living Group

<table>
<thead>
<tr>
<th>Objectives</th>
<th>Key Provisions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Urban Growth Objective</td>
<td>Urban development patterns that promote sustainable resource management.</td>
</tr>
<tr>
<td>Living Objective</td>
<td>A quality living environment that meets the differing needs of the City's population.</td>
</tr>
<tr>
<td>Specific objective</td>
<td></td>
</tr>
</tbody>
</table>

6.3 Peripheral urban development of a scale and character consistent with a primary emphasis on urban consolidation; which avoids, remedies or mitigates adverse impacts on water, versatile soils, significant amenity values and other natural resources; and which makes efficient use of physical infrastructure.

11.1 A diversity of living environments based on the different characteristics of areas of the City.

11.4 A living environment that is pleasant and within which adverse environmental effects on amenity values are avoided remedied or mitigated, while still providing the opportunity for individual and community expression.

| Key AERS | None Stated in City Plan. |
|----------------------------------------|
| Zone description and purpose | None Stated in City Plan. |
| Zone AERS | None Stated in City Plan. |
| Policy areas | Deferred status over land removed once stated constraint has been overcome. |

No specific policies are identified in the City Plan.
6.3 Ecological

6.3.1 Summary

The ecological group incorporates those areas of Christchurch City where land is identified as having important ecological values. It consists of the Conservation 1 (Natural, ecological and scenic parks), Conservation 1B (Bromley), 2 (Historic and garden city parks), 3 (Waterway conservation) and 3W (waterway conservation – Waimakariri) zones. It also incorporates the ecological heritage sites listed in Volume 3, Part 4, Appendix 2. In summary, the City Plan seeks that the existing ecological values are protected and enhanced.

The City Plan is of medium effectiveness. Land within the ecological area is used for rural (~58%) or conservation (~20%) purposes or is unimproved. Limited land use change occurred. Where it did, there is no identifiable loss of ecological values attributed to the change. However, this is influenced by the high level of City Council or Environment Canterbury ownership/control of land within the ecological group. For those ecological areas in private ownership, City Plan rules are viewed as a ‘back-stop’ only. However, where the rules do apply, there is a lack in precision of the associated City Plan mapping.

The City Plan is of reduced efficiency. The high level of public stewardship of the land reduces the need to resource consents to regulate land use change. Further, the City Council’s experience is that private mechanisms such as the QEII Trust lead to better ecological outcomes for a variety of reasons, often associated with a more active land management regime which can be partly funded from public sources.

It is recommended that:

1. The City Plan rules are reviewed to ensure that land use activities anticipated within, or which support the maintenance and enhancement of the values of, ecological areas are not unnecessarily required to obtain resource consent.

2. For private land identified with ecological values, the boundaries and values are reviewed for accuracy.

6.3.2 Introduction

The ecological group incorporates those areas of Christchurch City where land is identified as having important ecological values (See Figure 33). It consists of the Conservation 1 (Natural, ecological and scenic parks), Conservation 1B (Bromley), 2 (Historic and garden city parks), 3 (Waterway conservation) and 3W (waterway conservation – Waimakariri) zones. It also incorporates the ecological heritage sites listed in Volume 3, Part 4, Appendix 2. In summary, the City Plan seeks that the existing ecological values are protected and enhanced.

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239 Associated with the Conservation 1 Zone on the Port Hills and Conservation 3W Zone adjacent to the Waimakariri River, and the sites upon which the ecological heritage sites are located.
This evaluation is limited to examining land use change that may impact on the existing ecological values. The city Plan does not control other matters that may impact on ecological values such as water management, pest management and retirement from farming.

In this section: outcomes from interviews with key City Council staff are recorded; using these interviews, available data and site visits, effectiveness and efficiency is considered; the main findings and recommendations are set out, and finally an addendum is included summarising the relevant City Plan provisions.

6.3.3 Interviews with City Council Staff

City Council staff are experienced in working with and implementing the City Plan in relation to the ecological areas. We interviewed key staff and from plan policy (and their consultant) and plan administration and ecologists.

City Council staff recently completed a survey measuring the ecological values associated with Ecological Heritage Sites (EHS). Of the 49 sites surveyed, only one was identified with declining ecological values - the ecological values of the other sites are either maintained or enhanced. The reason for the decline in the EHS 15.06 is due to the landowner undertaking activities not in accordance with an agreed management regime. The Council sought to re-establish an appropriate land management regime for the site and is confident the ecological values will recover.

Some development occurred within EHS. Despite this, the ecological values are not eroded, primarily due to the minor and insignificant nature of the development proposed. Residential development occurred within two EHS. In these instances, the offered environmental compensation resulted in a net gain to overall ecological values.

While, overall the City Plan is successful at maintaining and enhancing the ecological values associated with EHS, over 90% of EHS are in Council ownership. This high percentage of Council ownership is a large contributor to the success of the EHS as a vehicle for maintaining and enhancing ecological values. However, other mechanisms outside the City Plan are possibly more effective at protecting ecological values, namely Queen Elizabeth II Trust covenant and private covenants. Such covenants are often more stringent and more restrictive than the City Plan rules and, more importantly, are applied with landowner full support and commitment.

There is concern with the accuracy of the mapping of some EHS. In general, EHS in the Port Hills are accurately mapped. In other areas the actual ecological values are not accurately or correctly

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240 EHS 5.01, EHS 15.21.
241 For example, Canterbury Park, banks of the Heathcote River.
shown in the City Plan. Further, there is concern that EHS are not easily or clearly identifiable within the City Plan or on City Plan maps. This being the case, EHS are often overlooked by both plan users and plan administrators.

With regards to Conservation zoned land, as the majority of this land is in Council ownership and this ensured the associated natural, conservation and landscape values were maintained.

6.3.4 Effectiveness and Efficiency

The effectiveness and efficiency of the City Plan is determined by how well, and at what cost, it controls development in order to achieve the protection and enhancement of the identified ecological values within the City.

From rating data-base, in 2010 the land within the ecological areas is largely used for rural (~58%) or conservation (~20%) purposes, or is unimproved. There are small isolated areas of other land uses. This reflects the tenure of this land as determined from the interviews. Field observations confirm this.

There was a low level of building activity in the ecological area. Building consents for dwellings were granted in the Conservation 1 (1 consent at Styx in 2001) and Conservation 3 (3 consents between 2002 and 2005 at Bishopdale) zones. In 2009 and 2010, residential building consents were granted in relation to ecological heritage site 5.01 (four dwellings) and 15.21 (five dwellings). Staff identified that this was a result of the application of the environmental compensation policy, and resulted in a net gain in ecological values. In addition, while a small number of non-residential building consents were granted, other that in relation to Trees of Canterbury at Ferrymead, these relate to conservation or recreation activities.

The resource consent records show that 79 properties within the Conservation 1, 1B, 2, 3 and 3W zones and 18 ecological heritage sites were the subject of resource consent applications. Within the Conservation zones, approximately half the listed non-compliances relate to heritage buildings and protected trees, and a further 16% to waterways. The remainder of the non-compliances are spread across a wide variety of other rules in the City Plan. An examination of the description field of the resource consent data-bases indicates that, with the exception of utilities, the consents relate to activities that may be expected to occur in these locations. Field observation indicates that most of these areas are managed by the City Council or Environment Canterbury.

In terms of the ecological heritage sites, there is no observable pattern to the listed resource consent non-compliances.

Interviews with staff confirm that, based on recent monitoring, the activities occurring within these ecological areas are consistent with the protection and enhancement of the ecological values. While development is occurring around these areas, it is being managed so not to impact on, and actually results in the improvement of, the values. However, these interviews also indicate that there are mapping issues with a number of ecological heritage sites, particularly those not on the Port Hills.

All the resource consent applications were granted, predominately after being processed on a non-notified basis.

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242 Associated with the Conservation 1 Zone on the Port Hills and Conservation 3W Zone adjacent to the Waimakariri River, and the sites upon which the ecological heritage sites are located.
243 Policy 6.3.14 Environmental Compensation.
244 The land was vested in the Council, who undertook ecological improvements.
Therefore, in summary within the ecological areas:

1. The land use is predominantly rural and conservation related. The rural land use reflects the large areas of the Port Hills and adjacent to the Waimakariri River which fall within the ecological group. Overall, there is limited evidence from the data and field observations of unanticipated land uses occurring.

2. There is no direct evidence of land use change adversely impacting on the identified ecological heritage values in the City Plan. As such, the City Plan is effective. However, this may also be because that City Council or Environment Canterbury manages a high proportion of the land within the conservation zones. The environmental compensation policy has been influential in achieving greater ownership by the City Council.

3. For those ecological sites in private ownership, City Plan rules are viewed as a ‘back-stop’ only. The City Council’s experience is that private mechanisms such as the QEII Trust lead to better ecological outcomes for a variety of reasons, often associated with a more active land management regime which can be partly funded from public sources.

6.3.5 Summary of Effectiveness and Efficiency

The effectiveness and efficiency of City Plan policies, rules, or other methods in achieving its objectives is summarised in Table 38.

<table>
<thead>
<tr>
<th>Objective</th>
<th>Effectiveness</th>
<th>Efficiency</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Outcome</td>
<td>Comment</td>
</tr>
<tr>
<td>2.2 Water</td>
<td>Unknown but likely to be high</td>
<td>Changes in land use controlled by individual assessment through resource consent processes.</td>
</tr>
<tr>
<td>2.4 Natural features and habitats</td>
<td>Medium</td>
<td>The contributions of ecological; values to this objective is maintained and enhanced</td>
</tr>
<tr>
<td>2.6 Coastal environment</td>
<td>Medium to high</td>
<td>The outcome is appropriate, but the influence of the City Plan is questionable</td>
</tr>
<tr>
<td>4.1 Form</td>
<td>Medium</td>
<td>The contributions of ecological; values to this objective is maintained and enhanced</td>
</tr>
<tr>
<td>5.1 Maori and their resources</td>
<td>Unknown</td>
<td>The contributions of ecological; values to this objective is maintained and enhanced</td>
</tr>
<tr>
<td>6.3 Peripheral urban growth</td>
<td>High</td>
<td>The contributions of ecological; values to this objective is maintained and enhanced</td>
</tr>
<tr>
<td>10.2 Protection of natural features and archaeological sites</td>
<td>High for ecological values</td>
<td>The contributions of ecological; values to this objective is maintained and enhanced</td>
</tr>
<tr>
<td>14.3 Design and appearance</td>
<td>High</td>
<td>Indigenous vegetation is being appropriately managed on land within this group</td>
</tr>
</tbody>
</table>

Table 38: Summary of Effectiveness and Efficiency of the Ecological Group

245 That is, the rules fulfil the function of controlling the development of this land in a way that is not consistent with its values and/or current protection mechanisms.
Resulting from this evaluation, it is recommended that:

1. The City Plan rules are reviewed to ensure that land use activities anticipated within, or which support the maintenance and enhancement of the values of, ecological areas do not unnecessarily obtain resource consent.

2. For private land identified with ecological values, the boundaries and values are reviewed for accuracy.

6.3.6 Addendum: Summary of the City Plan for the Ecological Group

<table>
<thead>
<tr>
<th>Objectives</th>
<th>Key Provisions</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Natural Environment Objective</strong></td>
<td><strong>Key AERS</strong></td>
</tr>
<tr>
<td>Maintenance and enhancement of the quality of natural resources and their ability to meet the needs of present and future generations.</td>
<td>Volume 2 Section 2 Natural Environment</td>
</tr>
<tr>
<td><strong>City Identity Objective</strong></td>
<td>1. Maintaining surface and groundwater availability and quality</td>
</tr>
<tr>
<td>A distinctive city where form, amenity and heritage values are maintained and enhanced.</td>
<td>2. Minimise flooding and water contamination</td>
</tr>
<tr>
<td><strong>Tangata Whenua Objective</strong></td>
<td>3. Enhance and rehabilitate waterways and retain open space and natural character</td>
</tr>
<tr>
<td>The management of the City's natural and physical resources, taking into account the principles of the Treaty of Waitangi.</td>
<td>4. Retain and improve the wetland areas</td>
</tr>
<tr>
<td><strong>Urban Growth Objective</strong></td>
<td>5. Protection/enhancement of ecological, conservation, recreational and natural values, ecosystems and habitats, and public access.</td>
</tr>
<tr>
<td>Urban development patterns that promote sustainable resource management.</td>
<td>6. Development at compatible scale and location</td>
</tr>
<tr>
<td><strong>Subdivision and Development</strong></td>
<td>7. Reduce erosion and enhance stability of coastal environment</td>
</tr>
<tr>
<td>That the values and functioning of natural and physical resources are maintained when the process of land subdivision and/or development takes place, recognising anticipated land use activities</td>
<td>8. Retain open landscaped character of coastal dunes and rocky headlands.</td>
</tr>
<tr>
<td><strong>Recreation and Open Space Objective</strong></td>
<td><strong>Volume 2 Section 4 City Identity</strong></td>
</tr>
<tr>
<td>Quality open space and a range of recreational opportunities in the City.</td>
<td>1. Conservation/enhancement of City’s areas of significant habitats, natural values and visual features.</td>
</tr>
<tr>
<td><strong>Specific Objectives</strong></td>
<td>2. Conservation/enhancement of coastal environment.</td>
</tr>
<tr>
<td>2.2 Maintenance and enhancement of the quality and availability of the City’s water resources, and of the natural and cultural values and public accessibility of waterways and their margins.</td>
<td><strong>Volume 2 Section 5 Tangata Whenua</strong></td>
</tr>
<tr>
<td>2.4 The protection and enhancement of key elements and processes comprising the City’s natural environment.</td>
<td>1. Recognition of Maori values</td>
</tr>
<tr>
<td>2.6 Preservation of the natural character of the coast, including coastal processes, habitat, landscape, and associated amenity and cultural values; and the maintenance of the stability of the coastline consistent with the retention of these values.</td>
<td>2. Access to and use of traditional resources on public land</td>
</tr>
<tr>
<td>4.1 The maintenance and enhancement of natural and physical features and characteristics contributing to the distinctive form of the City.</td>
<td><strong>Volume 2 Section 6 Urban Growth</strong></td>
</tr>
<tr>
<td>5.1 To recognise the importance of, and provide for, the relationship of Maori, their culture and traditions with ancestral lands, waters, sites, waahi tapu and other taonga.</td>
<td>1. Maintenance/enhancement of landscapes, ecological features, margins of waterways and the coast.</td>
</tr>
<tr>
<td>6.3 Peripheral urban development of a scale and character consistent with a primary emphasis on urban consolidation; which avoids, remedies or mitigates adverse impacts on water, versatile soils, significant amenity values and other natural values and processes comprising the City’s natural environment.</td>
<td><strong>Volume 2 Section 10 Subdivision and Development</strong></td>
</tr>
<tr>
<td>6.5 Recognise and protect areas of significant natural flora and fauna and prevent inappropriate use or development including disturbance of land surface and vegetation in coastal margins.</td>
<td>1. Protection of integrity of significant natural features, ecosystems through land subdivision</td>
</tr>
<tr>
<td><strong>Volume 2 Section 14 Recreation and Open Space</strong></td>
<td><strong>Volume 2 Section 14 Recreation and Open Space</strong></td>
</tr>
<tr>
<td>2. Conservation of open space character.</td>
<td>2. Conservation of open space character.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Zone description and purpose</th>
<th><strong>Conservation 1 (Natural ecological and scenic parks)</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>These areas include habitats for birds, fish, invertebrate species and having significant scientific, ecological, educational, recreational, landscape and tangata whenua values.</td>
<td><strong>Conservation 1A (Coastal margins)</strong></td>
</tr>
<tr>
<td>Recognise and protect areas of significant natural flora and fauna and prevent inappropriate use or development including disturbance of land surface and vegetation in coastal margins.</td>
<td><strong>Conservation 1B (Bromley)</strong></td>
</tr>
<tr>
<td>Comprises city’s sewage treatment facilities adjacent to Avon-Heathcote estuary. Associated oxidation ponds have high ecological values.</td>
<td><strong>Conservation 2 (Historic and garden parks)</strong></td>
</tr>
<tr>
<td>Parks containing historic structures and buildings used for a range of commercial concessions. Parks also having important scenic, educational, recreational and the technical values and importance for passive recreational activities.</td>
<td></td>
</tr>
</tbody>
</table>
resources; and which makes efficient use of physical infrastructure.

10.2 That significant natural features and archaeological sites be recognised and protected at the time of considering applications for, and through the process of, land subdivision and/or land use development, recognising likely subsequent land use practices.

14.3 Open spaces and recreational facilities that are designed to be sympathetic to the scale and character of the surrounding environment, and to the particular characteristics of the area itself.

Conservation 3 (Waterway conservation)
The protection of natural, ecological and cultural values of waterways and their margins, including public access to and along waterways and levels of public use of waterways.

Conservation 3W (Waterway conservation-Waimakariri)
Includes southern half of the surface and bed of the Waimakariri River, margins up to primary stopbank. River is source of aggregates and removal is encouraged. River is important for sports and recreation and supports a range of regenerating indigenous vegetation including ecological heritage sites.

Policy areas
1. Groundwater quality
2. Surface waters
3. Wetlands
4. Aquatic habitats
5. Waterway margins
6. Building on waterway margins
7. Esplanade reserves
8. Compatibility of activities
9. Enhancement
10. Ecosystems and habitats
11. Extended protection
12. Biodiversity
13. “Green” corridor
14. Natural and amenity values
15. Coastal activities
16. Coastal development
17. Use of the margins
18. Water quality
19. Coastal stability
20. Rocky coastlines and headlands
21. Estuaries, waterways and wetlands
22. Coastal environment
23. Garden City
24. Natural, cultural and scenic values
25. Hazards
26. Environmental compensation
27. Natural features, ecosystems and archaeological sites
28. Waterway margins access
29. Indigenous vegetation
30. Adverse effects
31. Local amenities
32. Open space character.
6.4 Fill and Excavation

6.4.1 Summary

The fill and excavation group incorporates those parts of the City Plan that relate to filling and excavation, except for the ‘content of material’ rule which is dealt with in the ‘land contamination’ group. The provisions largely apply on a City-wide basis. The provisions can be conveniently grouped as follows:

1. Waterway and coastline setbacks: which seek to protect; the functioning of flood plains, ecological values, amenity values, riparian values, public access, and access for management and maintenance, and the opportunity for enhancement.

2. Cashmere Stream and Lower Styx ponding areas: which seek to protect the floodwater storage capacity of these basins.

3. General earthworks: which seek to control the localised adverse effects associated with earthworks.

Many of the filling, excavation and ponding area provisions were the subject of Variation 48 to the City Plan. This variation was finally beyond challenge in July 2010, partly as a result on the public notification of Proposed Plan Change 32. It was made operative in January 2011, and effects the application of a number of key rules. Therefore, conclusions on the effectiveness and efficiency of the City Plan in relation fill and excavation must be treated with caution.

With the possible exception of the building consent exemptions from the waterway and setback rules, the City Plan water way and set back provisions are likely to be of high effectiveness. The waterway and coastline setbacks accounted for approximately 80% of the resource consent non-compliance within this group. A majority of these related to the utility and environmental asset waterways.

The City Plan general earthwork provisions are likely to be of high effectiveness. There is the potential to better integrate these controls with regional rules administered by Environment Canterbury.

It is recommended that:

1. The setback provisions in relation to utility and environmental asset waterways are reviewed for the purpose of reducing the number of resource consents approved on a non-notified basis.

2. The general earthwork rules are reviewed to achieve better integration with rules administered by Environment Canterbury.

3. The building consent exemptions to the City Plan rule are reviewed to determine whether the building consent process is achieving a similar outcome to that anticipated in the City Plan.

4. The City Plan is reviewed to create more explicit linkages between the policies and rules in order to ensure the implementation of the rules achieved the anticipated outcomes.

Approximately 635 individual non-compliances.
6.4.2 Introduction

The fill and excavation group incorporates those parts of the City Plan that relate to filling and excavation, except for the ‘content of material’ rule which is dealt with in the ‘land contamination’ group. The provisions can be conveniently grouped into three, being waterways and coastline setbacks, ponding areas and general earthworks. The provisions largely apply on a City-wide basis.

In summary, the City Plan seeks the following outcomes in relation to fill and excavation:

1. For waterway and coastline setbacks, the protection of: the functioning of flood plains, ecological values, amenity values, riparian values, public access, and access for management and maintenance, and the opportunity for enhancement.

2. For the Cashmere Stream and Lower Styx ponding areas, the protection of the water storage capacity of these basins in order to manage flooding.

3. For general earthworks, the control of adverse effects associated with earthworks.

Many of the fillinig and excavation provisions are the subject of Variation 48 to the City Plan. This variation related to the management of flooding and inundation. As publicly notified, the variation amends the policies, rules, maps and other related provisions within the City Plan relating to natural hazards, flooding and the management of ponding areas. This variation was finally beyond challenge in July 2010, partly as a result on the public notification of Proposed Plan Change 32. However, as of October 2010, it is not operative, affecting the application of a number of rules within it. Consequently, the information presented below largely evaluates the fill and excavation provisions City Plan before Variation 48. Therefore, conclusions on the effectiveness and efficiency of the City Plan in relation fill and excavation must be treated with caution.

In this section: outcomes from interviews with key City Council staff are recorded; using these interviews, available data and site visits, effectiveness and efficiency is considered; the main findings and recommendations are set out, and finally an addendum is included summarising the relevant City Plan provisions.

6.4.3 Interviews with City Council Staff

City Council staff are experienced in working with and implementing the City Plan in relation to the fill and excavation provisions of the City Plan. We interviewed key staff and from plan policy and plan administration.

The waterways and coastline setback requirements are subject to a number of exemptions. There is no apparent issue regarding the need to widen (or reduce) the scope for exemptions. Generally they work well and do not undermine the outcomes in the City Plan. The same applies to the general earthworks requirements. However, there is potential for administrative inconsistency and unforeseen responses around the building consent exemption. In some cases, the building consent exemption is used by land developers to avoid the need to apply for resource consent in anticipation of the grant of building consent. However, building consents are not issued until resource consent for an activity has been approved. Therefore, there is an issue of the relative timing of the two processes. Currently this is overcome by generally where it is a building consent for a development meeting all bulk and location requirements is applied for but does not meet the earthwork requirements, a pragmatic approach is taken and resource consent for the development is not required. This is particularly so in the urban context where it is acknowledged the inevitable building consent application will address earthworks matters. Further clarification in the City Plan regarding the application of the building consent exemption would improve plan administration.
There is little pressure for development for building, subdivision or private plan change applications in the ponding areas\textsuperscript{247}. This is primarily due to much of the land now being in Council ownership and earlier Environment Court decisions to rezone some land for living purposes. Where land is not in Council ownership, development has occurred on the fringes of the ponding areas where land is markedly higher and accepted as being a low risk to flooding. Overall, City Plan provisions are considered to be working as the non-complying activity status discourages applicants from applying for consent.

Variation 48, notified December 2003, was made operative in January 2011. A number of rules have no effect\textsuperscript{248} until the Variation is fully operative. It is anticipated it will be made operative at the end of January 2011. In addition, Council has programmed a review\textsuperscript{249} of the waterway setbacks. This is in response to inaccuracies in mapping and the requirement to exempt swales from building setback requirements. The review is currently in the investigation stage.

In addition, there is some concern around the need for alignment or consistency with earthwork rules in the relevant regional plans.

\section*{6.4.4 Effectiveness and Efficiency}

The effectiveness and efficiency of the City Plan is determined by how well, and at what cost, it controls development in order to protection water ways, coastal lines, the ponding basins and to control the adverse effects of earthworks.

\subsection*{6.4.4.1 Waterway and coastline setbacks}

The waterway and coastline setbacks account for approximately 80\%\textsuperscript{250} of the resource consent non-compliance within this group.

Predominately, the non-compliances occurred within the Living zones (77\%). Business zones were the next biggest location, but only accounted for 10\% of the non-compliances. As shown in Figure 34, set backs from the smaller waterways resulted in approximately 63\% of these non-compliances, being environmental asset and utility waterways. When the outcomes of the applications are entered, they were granted. Generally, these applications were processed on a non-notified basis. Only a few applications were served on parties or publicly notified, and then with one exception, most likely as a result of the proposal as a whole rather than the setback requirements.

\begin{figure}[h]
\centering
\includegraphics[width=\textwidth]{figure34.png}
\caption{Non-compliances in Relation to Different Categories of Water Bodies}
\end{figure}

\begin{itemize}
\item [\textsuperscript{247}] Hendersons Basin, Cashmere Stream Floodplain, Cashmere Worsleys, Hoon Hay and Lower Styx.
\item [\textsuperscript{248}] Section 20 under the RMA.
\item [\textsuperscript{249}] Proposed Plan Change 33.
\item [\textsuperscript{250}] Approximately 635 individual non-compliances.
\end{itemize}
The description field in the resource consent data-base indicates the non-compliances are largely a result of site redevelopment, site improvements\textsuperscript{251}, or improvements in relation to the water body itself\textsuperscript{252}.

Within the City Plan there is an ‘exception’ rule\textsuperscript{253} that removes the requirement for resource consent within the setbacks under certain circumstances. These include works permitted by subdivision consent, consented under the Building Act, or by land use consent granted by Environment Canterbury. There is no information available that allows the circumstances, frequency or outcome of these exemptions to be evaluated. Staff are of the view that the building consent exemption may adequately address the City Plan matters when the earthworks are not specifically subject to the building consent\textsuperscript{254}. The description field from the resource consent data-base indicates that there are instances of resource consents being sought which possibly may have fallen under the building consent exception. We surmise from the description that resource consent may have been required for other reasons, so the waterway non-compliance was dealt with as well. Comment from staff suggests that these exemptions are pragmatic and, with the possible exception of elements of the building consent exemption, work.

Our field observations indicate that development in the setbacks are not hindering water way maintenance and not resulting in inappropriate environmental outcomes.

Overall the City Plan:

1. Is generally effective in controlling land use within the water body setbacks. Significant emphasis is placed on the resource consent process to controlling effects in individual circumstances.

2. Approach is resulting in a significant number of resource consents in relation to utility and environmental asset waterways which are largely granted on a non-notified basis. It is not clear from the available data how efficient this is. It may be the efficiency of the City Plan can be increased by considering further exemptions.

3. The exemptions provide an alternative mechanism to achieve what the City Plan is seeking without the parties incurring the additional costs of a separate resource consent process. There is no available data to evaluate the effectiveness or efficiency of these exemptions.

6.4.4.2 Cashmere Stream and Lower Styx ponding areas

The key rule\textsuperscript{255} within the City Plan relating to filling and excavation in the ponding areas have resulted in only a few resource consent applications between 2000 and 2010. One of these (in 2006) was for a significant subdivision and development at Westmorland involving significant filling, but compensatory storage. Again there are exemptions from the rules, of which land use consent from Environment Canterbury is the most significant. We cannot evaluate these exemptions based on the information available. Comment from staff suggests that these exemptions are pragmatic and work.

Our field observations indicate that these ponding areas are still largely undeveloped, except for in one location in Worsely’s Valley. In that circumstance compensatory storage has been provided through earthworks.

\textsuperscript{251} For example: swimming pools, decking, garaging, fencing, driveways.
\textsuperscript{252} For example: public access, bank improvements.
\textsuperscript{253} Volume 3, Part 9, Rule 5.2.6.
\textsuperscript{254} Typically driveways and retaining wall (over 1.5m in height) are subject to a building consent requirement, whereas general site earthworks are not.
\textsuperscript{255} Volume 3, Part 9, Rule 5.4.
This matter is closely associated with Variation 48. The ponding basin provisions were one of the last matters resolved in that process. Therefore, conclusions are not drawn on the effectiveness and efficiency of these provisions.

6.4.4.3 General earthworks

The general earthwork provisions control earthworks in relation to slope, depth and volume, with the rule thresholds varying depending on the sensitivity of the zone to the potential adverse effects of earthworks. Again, there are exemptions to this rule, with key exemptions relating to earthworks authorised by subdivision and building consent.

Between 2000 and 2010, approximately 150 resource consents were sought where non-compliance with the general earthwork rules is noted. The description field for these indicates that the consent requirement is triggered by some form of site redevelopment associated with a significant upgrading or change in land use. All these consents were granted. A large majority were processed non-notified, with the few which were publicly notified, or served on other parties, likely to have been a result of the potential effects of the overall proposal, not just the earthworks.

Only two of these consents relate to non-compliance with the slope threshold. The remainder relate to the depth and volume thresholds, with these often occurring in combination. As shown in Figure 35, predominately the non-compliances occurred in the living zones. Within this area, the Living 1 and Living Hills zones are the most common zones by a significant margin. The description fields indicate that these non-compliances relate to: site improvements, development site works, contaminated land remediation and waterway improvements.

Again, there is no information available that allows the circumstances, frequency or outcome of the exceptions to the general earthwork rules to be evaluated. Comment from staff suggests that these exemptions are pragmatic and, with the possible exception of elements of the building consent exemption, work.

Overall the City Plan:

1. The effectiveness of the general earthwork controls is difficult to determine. Again, significant emphasis is placed on the resource consent process to controlling effects in individual circumstances. Provided the conditions of those consents are appropriate and enforced, the localised effects of these earthworks should be appropriately managed.

2. Approach is not resulting in a significant number of resource consents, and when this is required these are generally treated as non-notified. Therefore, it is likely the efficiency of this approach remains unchanged.

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256 Volume 3, Part 9, Rule 5.5, including Table 1.
257 For example, underground storage tanks, supermarkets, multi unit developments, retirement villages.
258 For example, swimming pools, decking, retaining walls, driveways.
3. The exemptions provide an alternative mechanism to achieve what the City Plan is seeking without the parties incurring the additional costs of a separate resource consent process. There is no available data to evaluate the effectiveness or efficiency of these exemptions.

4. The linkages between the rules and policies in the City Plan are weak.

6.4.5 Summary of Effectiveness and Efficiency

The effectiveness and efficiency of City Plan policies, rules, or other methods in achieving its objectives is summarised in Table 39.

<table>
<thead>
<tr>
<th>Objective</th>
<th>Effectiveness</th>
<th>Efficiency</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.1 Land and soil</td>
<td>Unknown but likely to be high</td>
<td>The resource consent process enables a site by site assessment</td>
</tr>
<tr>
<td>2.2 Water</td>
<td>Unknown but likely to be high</td>
<td>The resource consent process enables a site by site assessment</td>
</tr>
</tbody>
</table>

Table 39: Summary of Effectiveness and Efficiency of the Fill and Excavation Group

Resulting from this evaluation, it is recommended that:

1. The setback provisions in relation to utility and environmental asset waterways are reviewed for the purpose of reducing the number of resource consents approved on a non-notified basis.

2. The general earthwork rules are reviewed to achieve better integration with rules administered by Environment Canterbury.

3. The building consent exemptions to the City Plan rule are reviewed to determine whether the building consent process is achieving a similar outcome to that anticipated in the City Plan.

4. The City Plan is reviewed to create more explicit linkages between the policies and rules in order to ensure the implementation of the rules achieved the anticipated outcomes.
### Addendum: Summary of the City Plan for the Fill and Excavation Group

<table>
<thead>
<tr>
<th>Objectives</th>
<th>Key Provisions</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Natural Environment Objective</strong></td>
<td>Key AERS</td>
</tr>
<tr>
<td>Maintenance and enhancement of the quality of natural resources and their ability to meet the needs of present and future generations.</td>
<td>1. Maintain the potential of land and soil resource.</td>
</tr>
<tr>
<td></td>
<td>2. Soil stability and versatility.</td>
</tr>
<tr>
<td></td>
<td>3. No increase in areas subject to erosion.</td>
</tr>
<tr>
<td></td>
<td>4. Retention of open space character and natural margins of waterways and avoidance of building activities, excavation and filling in proximity to them.</td>
</tr>
<tr>
<td><strong>Rural Objective</strong></td>
<td>Zone description and purpose</td>
</tr>
<tr>
<td>The sustained potential of land, soil, water and infrastructural resources in the rural area to support life and to meet reasonably foreseeable future rural and urban needs.</td>
<td>Filling and excavation can have significant effects on drainage patterns, visual amenities, erosion potential, loss of versatile soils, disturbance of ecosystems and dust nuisance. Filling can also have effects on coastline, waterways in terms of managing flood discharges, ecological and natural values. Rules are intended to address these effects.</td>
</tr>
<tr>
<td><strong>Specific Objective</strong></td>
<td>Policy areas</td>
</tr>
<tr>
<td>2.1 To maintain and enhance those physical, chemical and biological characteristics of land and soils, and the ecosystems they contain, in a way that best enables them to support life and provide for community needs.</td>
<td>1. Degradation and rehabilitation.</td>
</tr>
<tr>
<td>2.2 Maintenance and enhancement of the quality and availability of the City's water resources, and of the natural and cultural values and public accessibility of waterways and their margins.</td>
<td>2. Building on waterway margins.</td>
</tr>
<tr>
<td><strong>Zone AERS</strong></td>
<td>Zone AERS</td>
</tr>
<tr>
<td>1. Protection of the function of river margins and natural floodplains.</td>
<td>1. Protection of the function of river margins and natural floodplains.</td>
</tr>
<tr>
<td>2. Prevent groundwater contamination from deposition of unsuitable fill material.</td>
<td>2. Prevent groundwater contamination from deposition of unsuitable fill material.</td>
</tr>
<tr>
<td>3. Avoidance of filling, excavation and buildings in close proximity to waterways that impede flow and detract from amenity values of waterways.</td>
<td>3. Avoidance of filling, excavation and buildings in close proximity to waterways that impede flow and detract from amenity values of waterways.</td>
</tr>
<tr>
<td>4. Protection of water quality, ecological values, aquatic habitats.</td>
<td>4. Protection of water quality, ecological values, aquatic habitats.</td>
</tr>
<tr>
<td>5. Avoid filling and excavation which promotes erosion.</td>
<td>5. Avoid filling and excavation which promotes erosion.</td>
</tr>
</tbody>
</table>
6.5 Medium and High Density Living

6.5.1 Summary

The medium and high density living group incorporates those areas of the City where significant residential intensification is expected. The primary focus of the City Plan with respect to these areas is maintaining a predominance of residential activity, in a higher density environment. At the medium density scale (Living 3) largely the development is to be compatible with the existing environment and a reasonable degree of open space achieved. In the higher density Living 4 zones, the proportion of open space is expected to reduce.

In terms of the type of activities occurring in these areas, the City Plan is of high effectiveness. The land use is predominately residential.

With respect to built form outcome the Council has already determined that the City Plan is of low effectiveness. While a significant number of resource consents are being required, the Council has identified that the built form outcomes are not what it wishes to achieve. It is considering how to remedy this through a separate plan change process. The available resource consent non-compliance information and field collaboration support the City Council’s view. Therefore, the City Plan is also of reduced efficiency.

It is recommended that:

1. The individual rules relating to the bulk and location of structures are reviewed to reduce the number of non-notified resource consents, particularly within a single development. These rules include those relating to; outdoor spaces, continuous building length, recession planes and building separation.

2. Specific consideration is given to making current resource consent processes more effective in achieving the built form outcomes sought.

6.5.2 Introduction

The medium and high living area incorporates those areas of Christchurch City where significant residential intensification is expected (see Figure 36). It is made up of the Living 3 (Medium Density), Living 4A (Central City-Diverse), Living 4B (Central City/North Beach High Rise) and Living 4C (Central City Character) zones.

To provide context, at the start of the monitoring period within the medium and high living area there were approximately 15,600 dwellings\(^{259}\). This compares to approximately 126,500 dwellings in City as a whole\(^{260}\).

\(^{259}\) Dwelling count from the 2001 Census.

\(^{260}\) http://resources.ccc.govt.nz/files/11_AER1_1697_ChristchurchDwellingType-docs.pdf.
In summary, the City Plan seeks the following outcomes for these locations:

1. The principal land use is medium to high density residential housing with building heights ranging from moderate (Living 3) to high (Living 4B).

2. The character of the areas will change as the density of development increases. Within the medium density (Living 3) area, the development is compatible with the existing environment, including a reasonable degree of open space. In the higher density Living 4 zones, the proportion of open space is reduced.

3. Non-residential activities are generally limited to those that do not affect residential coherence.

The City Council recently notified Proposed Plan Change 53, which is currently awaiting local hearing. This Change largely addresses built form (urban design) outcomes of development. It achieves this by introducing land development scale thresholds above which consent is required, together with urban design principles to guide those consent processes. Therefore, the City Council has already identified a lack of suitable effectiveness of the City Plan in managing the built form outcomes.

Proposed Change 1 to the Canterbury Regional Policy Statement proceeds largely as in its current form, these areas may be subject to greater development pressure in the future.

In this section: outcomes from interviews with key City Council staff and their consultants are recorded; using these interviews, available data and site visits, effectiveness and efficiency is considered; the main findings and recommendations are set out, and finally an addendum is included summarising the relevant City Plan provisions.

6.5.3 Interviews with City Council Staff and their Consultants

City Council staff and their consultants are experienced in working with and implementing the City Plan in relation to the medium and high density suburban living area. We interviewed key staff and from plan policy (and their consultant) and plan administration.

The primary driver behind concerns over the state of high density living environment in the City is the perception that the City Plan is not achieving good built form (urban design) outcomes. Consultation with interest groups and the community identified increasing concerns over the poor relationship and connectivity with open space, increasing use of inferior building material, poor building design and a lack of connection with the built form and the neighbourhood it is located within. Council’s response has been the preparation and notification of Plan Change 53, which is based around the incorporation of strong urban design principles and amenity values considerations within the City Plan. Staff noted...
this response is consistent with the approach adopted in other large, metropolitan areas such as Auckland and Wellington as well as some overseas examples.

Many resource consent applications are resulting from non-compliances which are internal to the development site, and hence do not impact upon the wider environment. Developers did not appear willing to ‘push the building envelop’ in relation to the surrounding environment, except in relation to the street. For internal non-compliances, planning staff consider there is little ability or opportunity to notify and/or decline such applications. However, where non-compliances were not internalised\(^{261}\) to the site or written approvals had not been obtained from adjoining neighbouring properties, administration staff consider a stronger approach can be taken.

With Plan Change 53 being notified, it is envisaged that the number of resource consent applications will potentially increase given the new development scale control and the associated urban design criteria. The urban design criteria may result in greater cost for all parties associated with these consent processes.

### 6.5.4 Effectiveness and Efficiency

The effectiveness and efficiency of the City Plan is determined by how well, and at what cost, it controls development in order to achieve a medium to high density living environment.

As summarised in Figure 37, in 2010 the rating data-base shows residential as the dominant land use (86%). Further a number of the other land uses occurring are often associated with residential areas. These activities include education (1%), health (1%), and community (1%). There are small proportions of commercial (2%), industrial (2%) and tourist accommodation (2%) activities occurring primarily located in the Living 3 Zone.

Table 40 summarises the change in land use observed from the building consent data-base. In total there is approximately 1060 individual residential and 35 non-residential\(^{262}\) building consents. Predominately, the new land uses which occurred are residential in nature. With the exception of the Living 4C Zone, this change in land use is located throughout the medium and high density living area, and is located in the Inner City.

---

\(^{261}\) In particular building setback and floor area ratio rules.

\(^{262}\) With an estimated value of < $40,000.
A high proportion of the proposals requiring building consent are likely to have also sought resource consent. Within the resource consent data-base, excluding subdivisions, there are approximately 1400 individual resource consents entered between 2000 and 2010 relating to 1200 individual properties. Of these, 10 applications are entered as being declined, for 27 no outcome is noted, and the rest were granted. In terms of how these applications were processed, 19 applications are entered as being publicly notified, 19 as being served on parties (limited notified), 92 have no entry, and the rest were processed on a non-notified basis.

A summary of the listed non-compliance codes (with subdivisions included) is set out in Table 41. This shows that 62% of the non-compliances relate to the living zone rules and 32% to the transport rules.

When the living rule non-compliances are put together, they relate to maximising the development potential of the site while avoiding exceeding the height and density requirements.

From field observations, the consent processes are not effective in managing building design, particularly in relation to modulating the appearance of bulk when viewed from public space, and the interface between the building and the road frontage. Picture 24 shows a typical example of this. We also observed that any impression of open space is largely derived from the public space, not from private space. The open space within the site is largely functional and hard surfaced, such as for car parking and manoeuvring areas.

The transport non-compliances also demonstrate a similar development maximisation pattern. These non-compliances often occur in combination with living non-compliances.

<table>
<thead>
<tr>
<th>Non-compliance codes</th>
<th>No of entries</th>
<th>Percentage (%) of total non-compliance code entries</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Total Living</strong></td>
<td>2614</td>
<td>63%</td>
</tr>
<tr>
<td><strong>Key non-compliance codes</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Continuous building length</td>
<td>249</td>
<td>6%</td>
</tr>
<tr>
<td>Outdoor living space</td>
<td>399</td>
<td>10%</td>
</tr>
<tr>
<td>Outdoor service space</td>
<td>161</td>
<td>4%</td>
</tr>
<tr>
<td>Recession plane</td>
<td>399</td>
<td>10%</td>
</tr>
<tr>
<td>Separation from neighbours</td>
<td>434</td>
<td>10%</td>
</tr>
<tr>
<td>Street scene</td>
<td>660</td>
<td>16%</td>
</tr>
<tr>
<td><strong>Total Transport</strong></td>
<td>1347</td>
<td>32%</td>
</tr>
<tr>
<td><strong>Key Transport Codes</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Max. No. of vehicle crossings</td>
<td>276</td>
<td>7%</td>
</tr>
<tr>
<td>Number of parking spaces</td>
<td>261</td>
<td>6%</td>
</tr>
<tr>
<td>Queuing space</td>
<td>242</td>
<td>6%</td>
</tr>
</tbody>
</table>

Table 41: Summary of Resource Consent Non-compliances 2000 - 2010

Picture 24: Example of medium density development with poor design outcome
Therefore, in summary within the medium and high living areas:

1. The land use is predominately residential as sought by the City Plan. On this matter the City Plan is effective.

2. The available information supports the City Council’s decision to reconsider the design outcomes being achieved within the medium to high density living areas, particularly in relation to built form and open space.

6.5.5 Summary of Effectiveness and Efficiency

The effectiveness and efficiency of City Plan policies, rules, or other methods in achieving its objectives is summarised in Table 42.

<table>
<thead>
<tr>
<th>Objective</th>
<th>Effectiveness</th>
<th>Efficiency</th>
</tr>
</thead>
<tbody>
<tr>
<td>10.3 Amenity values</td>
<td>Medium to high</td>
<td>Council has already identified that the City Plan is not fully effective in achieving the built form and environment outcomes sought. Subdivision is unlikely to be driver for this</td>
</tr>
<tr>
<td>11.1 Diverse living environments</td>
<td>High</td>
<td>Intensification is resulting in greater diversity of living opportunities within the City</td>
</tr>
<tr>
<td>11.2 Housing needs</td>
<td>Unknown, but at least medium</td>
<td>Information is not available to allow full evaluation of this. But, for example, diversity of housing is being achieved through the provision of elderly person housing</td>
</tr>
<tr>
<td>11.3 Non-residential activities</td>
<td>High</td>
<td>The living areas are primarily used for living purposes</td>
</tr>
<tr>
<td>11.4 Adverse environmental effects</td>
<td>Low to medium</td>
<td>Council has already identified that the City Plan is not fully effective in achieving the built form and environment outcomes sought</td>
</tr>
<tr>
<td>11.5 External appearance</td>
<td>Low to medium</td>
<td>Council has already identified that the City Plan is not fully effective in achieving the built form and environment outcomes sought</td>
</tr>
<tr>
<td>11.6 Neighbourhood improvement</td>
<td>Low to medium</td>
<td>Council has already identified that the City Plan is not fully effective in achieving the built form and environment outcomes sought</td>
</tr>
</tbody>
</table>

Table 42: Summary of Effectiveness and Efficiency of the Deferred Living Group

Resulting from this evaluation, it is recommended that:

1. The individual rules relating to the bulk and location of structures are reviewed to reduce the number of non-notified resource consents, particularly within a single development. These rules include those relating to; outdoor spaces, continuous building length, recession planes and building separation.

2. Specific consideration is given to making current resource consent processes more effective in achieving the built form outcomes sought.
6.5.6 Addendum: Summary of the City Plan for the Medium and High Density Living Group

<table>
<thead>
<tr>
<th>Objectives</th>
<th>Key Provisions</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>City identity objective</strong></td>
<td>A distinctive city we formed, amenity and heritage values are maintained and enhanced.</td>
</tr>
<tr>
<td><strong>Subdivision and Development Objective</strong></td>
<td>That the values and functioning of natural and physical resources are maintained when the process of land subdivision and/or development takes place, recognising anticipated land use activities</td>
</tr>
<tr>
<td><strong>Living Objective</strong></td>
<td>A quality living environment that meets the differing needs of the City’s population.</td>
</tr>
<tr>
<td><strong>Specific objectives</strong></td>
<td></td>
</tr>
<tr>
<td>10.3</td>
<td>That the amenities of the built environment be maintained or enhanced through the subdivision process, and that the operation of the infrastructure, and the cost of its provision, not be adverse affected by subdivision proposals.</td>
</tr>
<tr>
<td>11.1</td>
<td>A diversity of living environments based on the different characteristics of areas of the City.</td>
</tr>
<tr>
<td>11.2</td>
<td>Opportunities for housing that meets the needs of all socio-economic groups, Tangata Whenua, and groups requiring specialised housing accommodation.</td>
</tr>
<tr>
<td>11.3</td>
<td>Non-residential activities located within the living areas which meet community needs, and are consistent with maintaining a high standard of amenity in living areas.</td>
</tr>
<tr>
<td>11.4</td>
<td>A living environment that is pleasant and within which adverse environmental effects on amenity values are avoided remedied or mitigated, while still providing the opportunity for individual and community expression.</td>
</tr>
<tr>
<td>11.5</td>
<td>Good quality building and site designed to achieve a high level of amenity throughout the living areas of the City.</td>
</tr>
<tr>
<td>11.6</td>
<td>The conservation and enhancement of living areas and the improvement, and where appropriate, replacement of existing housing.</td>
</tr>
</tbody>
</table>

**Key AERS**
- Volume 2 Section 11 Living
  1. Diversity of housing types
  2. Public awareness and involvement in planning
- Volume 2 Section 10 Subdivision and Development
  1. Pattern of subdivision complimentary and appropriate to the character of the land uses anticipated

**Zone description and purpose**
- Principally for medium (L3) to high density (L4B) residential housing with building heights ranging from moderate (Living 3) to high (Living 4B). Non-residential activities generally limited to those that do not affect residential coherence.

**Key AERS**
- (Apply to all zones unless otherwise specified)
  1. Diverse range of residential buildings at medium (1-4 storeys) to high (1-10 storeys) densities and height
  2. Open street scene reflecting the garden city image
  3. High level of residential amenity
  4. Ability for individual and community expression to encourage a variety in building design and style
  5. Maintenance of residential coherence
  6. Preservation of as much land space for residential activities
  7. Travellers accommodation recognised (except in L4B and L4C)
  8. Protection of significant investment and development (except L3)
  9. Pleasant residential environment in which activities causing adverse environmental effects are excluded.

**Policy areas**
- 13. Service stations and taverns/hotels Open space
- 14. Sunlight
- 15. Privacy and outlook
- 16. Services
- 17. Parking
- 18. Noise
- 19. Glare
- 20. Street scene
- 21. Scale
- 22. Infill and redevelopment
- 23. Buffers between living and business areas
- 24. Conservation and enhancement
- 25. Public participation
6.6 Land Contamination

6.6.1 Summary

The primary focus of the City Plan with respect to land contamination group is to promote the rehabilitation of contaminated land. The relevant City Plan provisions are primarily the content of fill and excavation material rule in Volume 3, Part 9 and the relevant policy relating to land and soil contamination.

The City Plan is of medium effectiveness in managing the rehabilitation of contaminated land. Council’s contaminated sites records show more sites being remediated than is apparent from the resource consent data-base. Further, when resource consents are being sought, it is not clear that Rule 5.6.1 is being applied consistently. In addition, the rule itself is out of step with the rehabilitation being sought to be achieved.

The City Plan is of reduced efficiency. Contamination issues are being resolved without reference to the City Plan suggesting other, possibly more efficient, processes may be being used in practice to achieve the rehabilitation. Without a significant development proposal, the resource consent process is in itself a disincentive to remediate contaminated sites.

It is recommended that:

1. The effectiveness of the trigger for the contaminated land rule is reviewed to provide greater certainty when consent will be required.

2. The activity status associated with remediation of contaminated land by filling and excavation is reviewed and changed from non-complying in order to reflect that the outcome sought is remediation.

3. Consideration is given to whether other processes exist which may efficiently result in remediation without reference to the resource consent process.

4. Systems are developed to reconcile the Council’s register of contaminated sites and the resource consent data-base.

6.6.2 Introduction

The land contamination group is a City-wide group that incorporates those City Plan provisions relating to land that is already contaminated. These primarily address the content of fill and excavation material rule and include the relevant policy relating to land and soil contamination.

The outcome sought is the promotion of the rehabilitation of contaminated land.

Environment Canterbury is also active in the management of contaminated land. It has its own database and regulatory functions under the RMA when discharges are continuing. However, often it is the City Council’s land use control that is the predominate regulation which instigates the remediation of all but the most significant contaminated site.

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263 Rule 5.6.1.
264 Volume 2, Part 2, Policy 2.1.2.
265 Volume 3, Part 9, Rule 5.6.1.
266 Volume 2, Part 2, Policy 2.1.2.
In this section: outcomes from interviews with key City Council staff are recorded; using these interviews, available data and site visits, effectiveness and efficiency is considered; the main findings and recommendations are set out, and finally an addendum is included summarising the relevant City Plan provisions.

6.6.3 Interviews with City Council Staff

City Council staff are experienced in working with and implementing the City Plan in relation to land contamination. We interviewed key staff from plan policy and plan administration.

The City Plan rules do not work well at achieving the outcomes sought in the City Plan. This is primarily due to site records not being entirely accurate and/or specific enough to identify the nature or extent to which a site is subject to contamination and therefore to drive the implementation of the key City Plan rule. This being the case, the onus is placed on the landowner/developer to demonstrate that their site is not contaminated and is suitable for development. Site testing is costly to an applicant in terms of both time and money. The Council is not in a position to offer financial assistance.

The Project Information Memorandum process, by identifying the site was subject to land contamination, may be resulting in land rehabilitation through the building consent process, rather than the resource consent process.

There is a strong disconnection between the outcomes sought in the City Plan and the non-complying activity status associated with resource consent applications. That said, a precautionary approach is justified in terms of the potentially dire consequences if development did occur on contaminated land.

6.6.4 Effectiveness and Efficiency

The effectiveness and efficiency of the City Plan is determined by how well, and at what cost, it controls development in order to achieve remediation of contaminated land.

To understand the influence of the City Plan requires consideration of:

1. What land is contaminated and what land has been remediated
2. The process that has caused the remediation.

An estimate of the amount of land which is contaminated is gained from the City Council’s contaminated site records\(^\text{267}\). As shown in Table 47, the recorded\(^\text{268}\) contaminated sites largely occur within the business and living zones, with a significant proportion of the known sites which are remediated being within the living zone. The remediation occurred over a large time period, spanning from 1982 to the present. From the dated data, between 2000 and 2010, 85 sites were remediated, with 52 being within the living zones and 27 in the business zones.

\(^{267}\) The contamination records are incomplete and when used for this purpose are subject to data variability issues.
\(^{268}\) Both contaminated and remediated.
Evaluating the effectiveness and efficiency of the Christchurch City Plan

Table 43: Estimate of Contaminated Sites and Remediation from Contaminated Site Records (CCC)

Except where land contamination is resulting in significant effects on the environment, remediation is likely associated with some form of land development. However, as shown in Table 43, the remediation records do not match the resource consent numbers. Consequently, it is difficult to determine the influence of the City Plan.

All resource consents were granted with ‘contamination’, ‘contaminated’, or ‘hydrocarbon’ in their description, or with a non-compliance code of ‘WWCON’\(^\text{270}\). All but one of these applications was considered on a non-notified basis\(^\text{271}\). However, not all these applications are recorded as being non-complying activities. This is surprising as critical standard Rule 5.6.1 is breached by remediation unless this is achieved by leaving the contaminated land \textit{in situ}. Discussion with plan administration staff reveals a disconnection between the City Plan provisions, their administration and the instigation and undertaking of remediation. This may be resulting in the key City Plan rule not being consistently applied.

The relationship between Rule 5.6.1 and Policy 2.1.2 is confused. In principle, non complying activity Rule 5.6.1 cannot be effective in controlling the ‘excavation’ of contaminated material when this excavation is a desired result of Policy 2.1.2. In reality, this tension is being resolved in a pragmatic fashion, by processing resource consent applications on a non-notified basis.

Overall, the City Plan is not fully effective. It is resulting in contaminated sites being remediated. However, it appears that sites are being remediated without resource consent processes, which draws into question the effectiveness and efficiency of Volume 3, Part 9, Rule 5.6.1. Further, staff identified that the information available is not sufficient to effectively apply this rule in all circumstances. In addition, the activity status of the rule itself is out of step with the rehabilitation being sought to be achieved.

\(^{269}\) This excludes the 69 undated remediation entries.
\(^{270}\) Waterways- Content of material.
\(^{271}\) For one application the manner in which it was processed is not identified.
6.6.5 Summary of Effectiveness and Efficiency

The effectiveness and efficiency of City Plan policies, rules, or other methods in achieving its objectives is summarised in Table 44.

<table>
<thead>
<tr>
<th>Objective</th>
<th>Effectiveness</th>
<th>Efficiency</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.1 Land and soil</td>
<td>Medium</td>
<td>Land is being remediated, but in some circumstances the City Plan may be a barrier to this occurring due to the requirement for resource consent and the activity status of that resource consent application.</td>
</tr>
<tr>
<td>13.4 Rural amenity values</td>
<td>Medium</td>
<td>Rural land is being remediated, but in some circumstances the City Plan may be a barrier to this occurring</td>
</tr>
</tbody>
</table>

Table 44: Summary of Effectiveness and Efficiency of the Land Contamination Group

Resulting from this evaluation, it is recommended that:

1. The effectiveness of the trigger for the contaminated land rule is reviewed to provide greater certainty when consent will be required.

2. The activity status associated with remediation of contaminated land by filling and excavation is reviewed and changed from non-complying in order to reflect that the outcome sought is remediation.

3. Consideration is given to whether other processes exist which may efficiently result in remediation without reference to the resource consent process.

4. Systems are developed to reconcile the Council’s register of contaminated sites and the resource consent data-base.
### 6.6.6 Addendum: Summary of the City Plan for the Land Contamination Group

<table>
<thead>
<tr>
<th>Objectives</th>
<th>Key Provisions</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Natural Environment Objective</strong></td>
<td><strong>Key AERS</strong></td>
</tr>
<tr>
<td>Maintenance and enhancement of the quality of natural resources and their ability to meet the needs of present and future generations.</td>
<td>Volume 2, Section 2, Natural Environment</td>
</tr>
<tr>
<td></td>
<td>1. Maintain potential of land and soil resource.</td>
</tr>
<tr>
<td></td>
<td>2. Retention of soil stability and versatility.</td>
</tr>
<tr>
<td></td>
<td>3. Reduction in areas of land subject to contamination.</td>
</tr>
<tr>
<td><strong>Rural Objective</strong></td>
<td>Volume 2, Section 13, Rural</td>
</tr>
<tr>
<td>The sustained potential of land, soil, water and infrastructural resources in the rural area to support life and to meet reasonably foreseeable future rural and urban needs.</td>
<td>1. Protect physical character of soil.</td>
</tr>
<tr>
<td><strong>Specific Objective</strong></td>
<td><strong>Zone description and purpose</strong></td>
</tr>
<tr>
<td>2.1 To maintain and enhance those physical, chemical and biological characteristics of land and soils, and the ecosystems they contain, in a way that best enables them to support life and provide for community needs.</td>
<td>None</td>
</tr>
<tr>
<td>13.4 That over the rural area as a whole, rural amenity values, including visual character, heritage values, cultural and recreational opportunities are maintained and whenever possible enhanced, and adverse effects of activities are recognised and controlled.</td>
<td><strong>Zone AERS</strong></td>
</tr>
<tr>
<td></td>
<td>1. Prevention of contamination of groundwater from deposition of unsuitable material.</td>
</tr>
<tr>
<td></td>
<td>2. Prevent deposition of material rendering land unsuitable for permitted activities.</td>
</tr>
<tr>
<td><strong>Policy areas</strong></td>
<td><strong>Policy areas</strong></td>
</tr>
<tr>
<td>1. Degradation and rehabilitation.</td>
<td>1. Degradation and rehabilitation.</td>
</tr>
<tr>
<td>2. Avoiding mitigating or remediating adverse effects.</td>
<td>2. Avoiding mitigating or remediating adverse effects.</td>
</tr>
</tbody>
</table>
6.7 Other Facilities

6.7.1 Summary
The other facilities group incorporates those areas of the City used for public or private open space and key facilities: It consists of the Open Space 3, 3B, 3C, 3D (Clearwater and Isaac Conservation Park), Special Purpose (Ferrymead, Pedestrian Precincts, Road and Rail) zones and those schedule activities set out in Volume 3, Part 9. The scheduled activities include, for example, listed service stations, hotels and taverns, service centres, fire stations and spiritual centres. In summary, the City Plan seeks that these facilities continue to function, and in some cases develop, while controlling any inappropriate adverse effects on the environment.

The City Plan is generally of high effectiveness and of unchanged efficiency. The provisions are largely performing as expected.

It is recommended that:

1. The underlying zone technique is reviewed as this may enable development that is incompatible with the existing open space activities in circumstances when those activities will be continued.

2. The boundaries of the Open Space 3B Zone are updated to reflect current land uses.

3. The differentiation between hotel and residential activities in the Open Space 3D (Clearwater Zone) is further considered to ensure that the intended land use outcome is achieved.

4. The scheduled activity lists are updated as a number of the scheduled activities have ceased.

6.7.2 Introduction
As shown in Figure 38, the other facilities group incorporates:

1. Metropolitan facilities located in the Open Space 3 Zone, such as Queen Elizabeth II Park

2. Private recreation facilities located in the Open 3B Zone, such as Addington and Riccarton racecourse

3. Agribusiness (located in its own Open 3C Zone), Rosebank (located in its own Open Space 3D zone), Clearwater

Figure 38: Geographical Extent of the Other Facilities included within Different Zones
(located in its own Open Space 3D Zone), Isaac Conservation Park (located in its own Open Space 3D Zone) and Ferrymead (Special Purpose (Ferrymead) Zone).

4. Pedestrian Precincts ((Special Purpose (Pedestrian Precincts) Zone, Road (Special Purpose (Road) Zone) and Rail (Special Purpose (Rail) Zone).

The other facilities group also incorporates the schedule activities set out in Volume 3, Part 9 of the City Plan. These scheduled activities are identified and listed existing activities that are distinctly different in function, appearance and effects from the land uses surrounding them. They include, for example, listed service stations, hotels and taverns, service centres, fire stations and spiritual centres.

In summary, the City Plan seeks that these facilities can continue to function, and in some cases develop, while controlling any inappropriate adverse effects on the environment. If the facilities choose not to continue, or reduce the amount of land used, the City Plan provides an underlying zoning to control the change in land use.

The education and hospital group is considered in detail earlier in this report. The remainder of the facilities are included in this group.

In this section: outcomes from interviews with key City Council staff are recorded; using these interviews, available data and site visits, effectiveness and efficiency is considered; the main findings and recommendations are set out, and finally an addendum is included summarising the relevant City Plan provisions.

6.7.3 Interviews with City Council Staff

City Council staff are experienced in working with and implementing the City Plan in relation to the other facilities provisions. We interviewed key staff from plan policy and plan administration.

The zone purposes and descriptions for some of the zones within the group are too general and vague. They lack a degree of specificity and clarity in terms of the range and types of activities sought to be provided for. Rules are similarly of a general or generic nature, applying across the group. Specific and focussed rules are required to properly manage the effects associated with the very different and unique activities occurring on these sites.

The application of an underlying zoning technique for activities other than open space or special purpose activity is problematic. Where development aspirations for other activities exist, this can often be achieved through the underlying zoning attached to the site. This results in activities establishing on sites inconsistent and incompatible with existing group activities and their respective zone descriptions and purposes.

The Open Space 3B and 3D zones are identified as being subject to development aspirations by their current landowners, particularly the Open 3D (Clearwater) Zone, which was subject to an earlier plan variation to enable further development. This resulted in a number of resource consent applications motivated by the land developer seeking to do ‘the right thing’ and applying for consent to undertake activities as opposed to seeking to ‘push the boundaries’ and invite enforcement action or undertake activities unlawfully.

For the Open 3D (Clearwater) Zone, there is concern regarding the effectiveness of the new thresholds for permanent accommodation and travellers accommodation permitted to establish on the site. There is difficulty in clearly identifying and establishing the land tenure/ownership arrangement

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272 For example, Open Space 3B (Riccarton Racecourse) has an underlying Living 1 Zone. This has enabled residential development to establish within the Open Space 3B Zone.

273 Variation 93.
as accommodation units appear to be occupied for extended periods as opposed to being used for short stay, travellers’ accommodation purposes.

A number of scheduled activities 274 have closed down. Activities, other than the scheduled activity, will often establish on the site being subject to the underlying zoning. This is a successful technique as the underlying zone generally reflects the surrounding zoning pattern and therefore the desired environmental outcomes sought. However, the City Plan does need to be updated to more accurately reflect the changes that have occurred.

6.7.4 Effectiveness and Efficiency

The effectiveness and efficiency of the City Plan is determined by how well, and at what cost, it controls the development of facilities and any resulting inappropriate adverse effects on the environment.

From rating data-base, the land uses in the other facilities area largely accords with the anticipated by the various zones, with two possible exceptions. There are a significant number of sites with residential development in the Open Space 3B and 3D (Clearwater) zones, being approximately 60 and 180 properties respectively. An examination of the description fields of the resource consent data-base largely confirms this.

With respect to the Open Space 3B Zone, the resource consent data-base shows that approximately 30 dwellings gained resource consent between 2000 and 2010. These appear to relate to land on the edge of individual Open Space 3B zones that the private operator has deemed as no longer being required for the private recreation activity. Typical examples are development on the edges of Waimariri Golf Course and Addington Racecourse. Staff identified concern that this development is not compatible with the open space activities 275, however, because the underlying zone allows for the type of development which occurred, they were not able to consider such effects. Our field observations supports the view that this type of development may result in reverse sensitivity effects, but given that the land was owned and developed by the private open space provider, we assume that this was part of their decision process. However, what it does raise is whether the City Plan should better control these effects. In order to achieve this, it will be necessary to review the underlying zoning technique.

In terms of the Open Space 3D (Clearwater) Zone, this zone anticipates residential development of up to 111 units, together with a 350 bedroom hotel. Staff identify that there are plan administration issues in distinguishing between the hotel and residential components of the anticipated development.

The overall resource consent numbers are relatively low except in the Open Space 3B and Open Space 3D (Clearwater) zones. With respect to the Open Space 3B Zone, there is no observable pattern of the type of activities requiring consent apparent from the description and non-compliance fields. Therefore, there are no indicators of low effectiveness. In terms of the Open Space (Clearwater) Zone, the consents are largely associated with the establishment of this new facility.

With respect to the scheduling of activities, the data available is limited. Service stations and chartered clubs are the only two types of activities where a meaningful number of properties were subject to resource consent applications 276. This is possibly a reflection of the level of redevelopment of these established activities. The schedules are no longer current and require updating.

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274 In particular Service Stations, hotels and taverns location in suburban living environment.

275 It is understood that there are examples of new residential neighbours complaining to the Council about the effects of the existing open space activities.

276 19 and 10 properties respectively.
Examining the manner in which the resource consent applications were processed, there is a similar pattern to the 'education and hospital group'. A significant majority of the resource consents were processed non-notified and granted. The notified consents fall into one of three groups. They relate to significant redevelopment of open space facilities which may have impacted on the surrounding environment, communication utilities, or the use of unwanted land for other, generally residential, purposes.

Therefore, in summary the City Plan provisions relating to the 'other facilities' group are performing as is to be expected, and therefore are largely effective and efficient. However, the underlying zone technique may be resulting in development that may be incompatible with the open space activities.

6.7.5 Summary of Effectiveness and Efficiency

The effectiveness and efficiency of City Plan policies, rules, or other methods in achieving its objectives is summarised in Table 45.

<table>
<thead>
<tr>
<th>Objective</th>
<th>Effectiveness</th>
<th>Efficiency</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td><strong>Outcome</strong></td>
<td><strong>Comment</strong></td>
</tr>
<tr>
<td>6.3</td>
<td>Peripheral urban growth</td>
<td>Unknown</td>
</tr>
<tr>
<td>7.2</td>
<td>Road network</td>
<td>Unknown, but assumed to be High</td>
</tr>
<tr>
<td>7.5</td>
<td>Pedestrians</td>
<td>Unknown but assumed to be High</td>
</tr>
<tr>
<td>9.1</td>
<td>Local community facilities</td>
<td>Low</td>
</tr>
<tr>
<td>9.2</td>
<td>Metropolitan community facilities</td>
<td>Low</td>
</tr>
<tr>
<td>14.1</td>
<td>Provision and diversity</td>
<td>Medium</td>
</tr>
<tr>
<td>14.2</td>
<td>Efficient and effective</td>
<td>Low</td>
</tr>
<tr>
<td>14.3</td>
<td>Design and appearance</td>
<td>High</td>
</tr>
<tr>
<td>14.4</td>
<td>Adverse environmental effects</td>
<td>High</td>
</tr>
</tbody>
</table>

Table 45: Summary of Effectiveness and Efficiency of the Other Facilities Group
Resulting from this evaluation, it is recommended that:

1. The underlying zone technique is reviewed as this may enable development that is incompatible with the existing open space activities in circumstances when those activities will be continued.

2. The boundaries of the Open Space 3B Zone are updated to reflect current land uses.

3. The differentiation between hotel and residential activities in the Open Space 3D (Clearwater Zone) is further considered to ensure that the intended land use outcome is achieved.

4. The scheduled activity lists are updated as a number of the scheduled activities have ceased. Where land is now used for other purposes, this land is excluded from these zones.
### 6.7.6 Addendum: Summary of the City Plan for the Other Facilities Group

<table>
<thead>
<tr>
<th>Key Provisions</th>
<th>Objectives</th>
</tr>
</thead>
</table>
| Key AERS       | Urban Growth Objective  
Urban development patterns that promote sustainable resource management.  
Transport Objective  
An efficient, safe and sustainable transport system in the city which provides for ease of accessibility for people and goods.  
Recreation and open space Objective  
Quality open space and a range of recreational opportunities in the City.  
Community Facilities and Identity  
Facilities which meet community needs and enhance opportunities for community participation.  
Specific objectives  
6.3 Peripheral urban development of a scale and character consistent with a primary emphasis on urban consolidation; which avoids, remedies or mitigates adverse impacts on water, versatile soils, significant amenity values and other natural resources; and which makes efficient use of physical infrastructure.  
7.2 An efficient and effective road network that allows the city to function and develop with minimal conflict between land uses, traffic and people.  
7.5 The safe movement of pedestrians in a pleasant environment.  
9.1 Provision for accessible community facilities to meet educational, spiritual, health, and other local needs.  
9.2 The provision of community facilities which serve metropolitan needs for educational, cultural and specialised services.  
14.1 (a) Open spaces and recreational facilities that are equitably distributed and conveniently located throughout the City.  
(b) Diversity in the type and size of open spaces and recreational facilities to meet local, district, regional and nationwide needs.  
14.2 (a) The efficient and effective use of open space and recreational facilities in meeting the recreational needs of the community.  
(b) Enhanced public awareness and enjoyment of the City’s open spaces and recreational facilities.  
14.3 Open spaces and recreational facilities that are designed to be sympathetic to the scale and character of the surrounding environment, and to the particular characteristics of the area itself.  
14.4 That the establishment or development of open spaces and recreational facilities is undertaken in a manner which enables adverse effects on amenity values to be avoided, remedied or mitigated.  |
| 1. Continues use of Wigram Special Purpose Zone for aviation activities.  
2. Improved access, ease of movement and safety for pedestrians.  
3. Provision of wide range of recreational opportunities.  
4. Safe air corridors.  
5. Effective, efficient and quality road, rail and air links.  
6. Provision of additional open space and recreation areas.  
7. Convenient and accessible open space to users.  
8. Increase use and awareness of recreational opportunities.  
9. Protection/enhancement of natural environment, cultural and scenic values, and open character.  
10. Increase multiple use of open space and recreational facilities.  
11. Compatibility of activities with surrounding local area.  
12. Metropolitan community facilities principally located within the central city and major suburban centres.  
13. Community and educational facilities being accessible and contributing to City identity.  
14. Maintenance and protection of amenity values.  |
| Zone description and purpose  
Open Space 3 (Metropolitan Facilities) Zone  
Areas and facilities being important regional and national physical resources for city and serving the local community.  
Open Space 3B (Private Recreation Facilities) Zone  
Covers 9 privately owned, major recreation facilities containing substantial metropolitan facilities. Zone allows for continued functioning, upgrading and expansion.  
Open Space 3C (Agribusiness Centre) Zone  
A large, specialist site enabling the Canterbury Sales yard and A&P Showgrounds to relocate with sufficient space and separation to mitigate adverse effects on adjoining land and to act as a retention basin.  
Open Space 3D (Clearwater Resort and Rosebank) Zone  
Zone covers 2 areas: Clearwater Tourist Resort and international golf course and Rosebank providing for outdoor/indoor recreation, passive open space, travellers’ accommodation.  
Special Purpose (Road) Zone  
Covers all land which is legal road. Purpose is the enabling of travel, property access and transportation of goods.  
Special Purpose (Pedestrian Precincts) Zone  
Covers 5 pedestrian precincts surrounded by Central City Zone. Important pedestrian areas which contribute to the recout focus and character of the central city.  
Special Purpose (Rail) Zone  
Rail network providing freight and passenger links. Zone purpose is to protect land in rail corridors if part of the network.  
Special Purpose (Wigram)  
Includes land previously known as RNZAF Base Wigram and includes the existing RNZAF Museum. Zone is subject of a Ministry of Defence designation.  
Special Purpose (Ferrymead) Zone  
Land incorporating the Ferrymead Historic Park, grazing, horse training, wetland and reserves. Council exploring future options for the land for range of recreation, tourist, business and residential uses. In interim, special purpose zoning applied pending further land use investigation.  
Special Purpose (South Halswell) Zone  |
Land recognized as providing for future residential development that is subject to constraints. Land has interim special purpose zoning pending a later plan change to overcome constraints.

### Policy areas

| 1. Development of Wigram Airfield |
| 2. Improve pedestrian facilities |
| 3. Mobility impaired |
| 4. Pedestrian safety |
| 5. Road safety |
| 6. Rail safety |
| 7. Hazardous substances |
| 8. Protect rail corridors. |
| 9. Hierarchy of roads |
| 10. Planning the network |
| 11. Land use control |
| 12. Convenience and accessibility |
| 13. Existing open space |
| 14. Large scale private facilities |
| 15. Metropolitan recreational open space and facilities |
| 16. Cultural facilities |
| 17. Educational facilities |
| 18. Types |
| 19. Diversity of environments |
| 20. Redevelopment of sites |
| 21. Multiple use |
| 22. Co-location |
| 23. Managing effects |
| 24. Quality |
| 25. Natural, cultural and scenic values |
| 26. Garden city image identity |
| 27. Indigenous vegetation |
| 28. Relationship to the local area |
| 29. Adverse effects |
| 30. Local amenities |
| 31. Open space character |
| 32. The roading network |

### Zone AERS

**Open Space 3 (Metropolitan Facilities) Zone**

| 1. Facilities to enhance recreational opportunities |
| 2. Maintain open space associated with facilities |
| 3. Provision of intensively used community facilities |
| 4. Provision of large scale buildings in open space location |
| 5. Provision of facilities to accommodate large events |
| 6. Limitation of potential effects of activities |

**Open Space 3B (Private Recreation Facilities) Zone**

| 1. Provision, maintenance of private metropolitan recreational activities. |
| 2. Provision, maintenance, upgrading of facilities consistent with open space character. |
| 3. Maintain open space associated with facilities. |
| 4. Maintain associated planting and visual amenity. |
| 5. Exclude, mitigate activities having adverse effects. |

**Open Space 3C (Agribusiness Centre) Zone**

| 1. Change in use and character of the site. |
| 2. Loss of open rural view for neighbours. |
| 3. Increase in noise effects. |
| 4. Increase in traffic flows. |
| 5. Facilities to dispose of stormwater and effluent. |
| 6. Retention of residential amenity within Hillmorton. |
| 7. Minimisation of air pollutants, odours. |

**Open Space 3D (Clearwater Resort and Rosebank) Zone**

| 1. Creation of international standard resort. |
| 2. Creation of international standard golf course. |
| 3. Development, enhancement of recreational opportunities. |
| 4. Provision of range of tourist and recreational activities. |
| 5. Extensive landscaping and planting. |
| 7. Design theme acknowledging rural character. |

**Special Purpose (Road) Zone**

| 1. Maintenance of hierarchical road network. |
| 2. Ease of peoples and goods travel mobility. |
| 3. Safe, efficient road network. |
| 4. Expected localised effects of road - noise, fumes, etc. |
| 5. Define roads to be stopped, not formed. |
| 6. Minimise effects of change to hierarchy. |
| 7. Retention of important street trees. |
| 8. Enhance riparian planting on legal road next to waterway. |
| 9. Avoid inappropriate building. |

**Special Purpose (Pedestrian Precincts) Zone**

| 1. Maintenance of important pedestrian areas. |
| 2. Safe pedestrian environment with ease of mobility. |
| 3. Restricted vehicle movements (servicing). |
| 4. Limited development-small buildings only. |
| 5. Recognition of Cathedral. |
| 6. Presence of compatible street activities. |
| 7. Operation of tourist and public transport. |

**Special Purpose (Rail) Zone**

| 1. Continued, improved operation of rail network. |
| 2. Buildings in rail corridors compatible with adjoining land uses. |
| 3. Continued maintenance of rail corridors. |
| 4. Control access across railways to maintain safety. |

**Special Purpose (Wigram)**

| 1. Continued utilisation of existing buildings and infrastructure for aviation related businesses. |
2. Development for appropriate industrial, commercial or residential activities.
3. The provision of appropriate internal access and circulation roads.
4. Some noise impacts associated with aircraft movements, aircraft engine testing and maintenance.
5. Use of open areas for temporary recreational events.
6. Retention/protection of buildings considered to be of significance.
8. Co-ordination/management of activities to minimise potential conflicts.

Special Purpose (Ferrymead) Zone
1. Preservation and restoration of original heritage features.
2. Development of historic village.
3. Activities of historic, scientific, technological nature recognizing adverse effects beyond the site.
4. Maintenance of ‘buffer’ activities adjoining the site.
5. Public access limited to different points.
6. Separation of vintage township from modern development.
7. Conservation and display of buildings and artefacts.
8. New development historically accurate and compatible with period.

Special Purpose (South Halswell) Zone
1. Development making efficient use of land.
2. Establishment of a ‘green corridor’.
3. Establishment of a link road.
5. Rural zoning retained over two land blocks.
6. New road accesses on SH75 confirmed by NZTA.
7. Equity of cost and benefits of development.
8. Development in accordance with development plan.
6.8 Tangata Whenua

6.8.1 Summary

The tangata whenua group incorporates the Cultural 2 (Nga Hau E Wha National Marae) Zone and the City-wide provisions, mainly in Volume 2, Part 5 relating to tangata whenua. In summary, the City Plan seeks to provide for the relationship of Maori, their culture and traditional with ancestral lands, waters, sites, waahi tapu and other taonga and facilitating Maori community development.

The effectiveness and efficiency of the City Plan is determined by how well, and at what cost, it controls the effects of the use, development and protection of land in a way which provides for the relationship of Maori, their culture and traditional with ancestral lands, waters, sites, waahi tapu and other taonga and facilitating Maori community development.

The effectiveness and efficiency of the City Plan is unknown. Between 2000 and 2010 development occurring at the Nga Hau E Wha National Marae was reasonably limited. With respect to the wider relationship the City Plan seeks to recognise and provide for, again there is a very low level of resource consent activity in relation to land use development. Whether these are a reflection of the City Plan is not a matter that can be determined from the available information. However, we are aware that staff at Te Runanga o Ngai Tahu are of the view that the City Plan does not effectively provide for the development of papakainga housing on ancestral land at Brooklands.

It is recommended that:

1. For the purposes of determining how most effectively and efficiently to provide for the relation of Maori, their culture and traditions, the City Council engage with the trustees of Nga Hau E Wha National Marae, the beneficial owners of the ancestral land and the appropriate representatives of Ngai Tahu.

2. The provisions of the City Plan are reviewed in light of New Zealand practice in order to determine how best to meet Council's obligations under sections 6(e), 7(a) and 8 of the RMA.

6.8.2 Introduction

As shown in Figure 39, the tangata whenua group incorporates:

1. The Cultural 2 (Nga Hau E Wha National Marae) Zone located on Pages Road. This zone provides for the development of this Marae as a major focal point for Maori and the community.

2. The City-wide provisions, mainly in Volume 2, Part 5 relating to tangata whenua. These provisions generally link the management of natural and physical resources with the principles of the Treaty of Waitangi. This includes by recognising and
providing for the relationship of Maori, their culture and traditional with ancestral lands, waters, sites, waahi tapu and other taonga and facilitating Maori community development.

In summary, the City Plan seeks to provide for the relationship of Maori, their culture and traditional with ancestral lands, waters, sites, waahi tapu and other taonga and facilitating Maori community development.

It is difficult to evaluate the effectiveness and efficiency of the City Plan provisions falling within this group with active engagement with the trustees of Nga Hau E Wha National Marae and the appropriate representatives of Ngai Tahu. However, this is outside the work brief. Therefore, the evaluation largely focuses on change in land use that may be an indicator of effectiveness and efficiency.

In this section: outcomes from interviews with key City Council staff are recorded; using these interviews, available data and site visits, effectiveness and efficiency is considered; the main findings and recommendations are set out, and finally an addendum is included summarising the relevant City Plan provisions.

6.8.3 Interviews with City Council Staff

City Council staff are experienced in working with and implementing the City Plan in relation to the tangata whenua provisions. We interviewed key staff from plan policy, plan administration.

Pressure for further development on Maori ancestral land was not a known or identified issue. The City Plan is viewed as being relatively passive in this regard. Greater use and recognition in the City Plan of Iwi Management Plans and cultural assessment of particular areas of cultural sensitivity could be made. The two way communication process with Tangata Whenua is difficult and unsatisfactory and requires review.

6.8.4 Effectiveness and Efficiency

The effectiveness and efficiency of the City Plan is determined by how well, and at what cost, it controls the effects of the use, development and protection of land in a way which provides for the relationship of Maori, their culture and traditional with ancestral lands, waters, sites, waahi tapu and other taonga and facilitating Maori community development.

Both the building consent and resource consent information have no entries in relation to the Cultural 2 Zone. This indicates that any development at Nga Hau E Wha National Marae was reasonably limited. Whether this is a reflection of the City Plan is not a matter that can be determined from the available information. Further, it is noted that Rehua Marae is not recognised within the City Plan.

With respect to the wider relationship the City Plan seeks to recognise and provide for, again the available data on this is very limited. A search of the resource consent data-base descriptions was undertaken for the words ‘Maori’, ‘cultural’, ‘whenua’, ‘papakainga’ or ‘marae’. Matching entries were only found for four relevant properties – two in the central city, and one each in Special Purpose (Ferrymead), and Cultural zones. In total, this is a very low level of resource consent activity in relation to land use development.

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277 Brooklands Lagoon.
278 Through Mahanaui Kurataiao Limited – Manawhenua Environmental Services.
279 ‘Construct a cultural artwork (pouwhenua)’ and ‘Proposal for new cultural and administrative/commercial headquarters for the Ngai Tahu organisation, carparking and landscaping.’
280 Establish and operate a Maori Cultural Village.
281 Outline Plan for a total Maori Immersion Early Childhood Learning Centre (pre-school).
While it is clear that a number of the environmental features identified are being managed in a manner reflecting the natural values, it cannot be determined whether this includes providing for the relationship of tangata whenua with this feature.

It is noted that the City Plan does not specifically recognise ancestral land and the purposes for which it may be managed, particularly for papakainga housing. We, the authors, are aware there is papakainga housing development aspirations on ancestral land at Brooklands\textsuperscript{282} that are not provided for in the City Plan. This is something we recommend the City Council directly consult on with Te Runanga o Ngai Tahu and the beneficial owners of the ancestral land.

6.8.5 Summary of Effectiveness and Efficiency

The effectiveness and efficiency of City Plan policies, rules, or other methods in achieving its objectives is summarised in Table 46.

<table>
<thead>
<tr>
<th>Objective</th>
<th>Effectiveness</th>
<th>Efficiency</th>
</tr>
</thead>
<tbody>
<tr>
<td>5.1 Maori and their resource</td>
<td>Unknown</td>
<td>This cannot be determined without consultation with tangata whenua.</td>
</tr>
<tr>
<td>5.2 Maori community development</td>
<td>Unknown</td>
<td>It is noted that the City Plan does not specifically recognise ancestral land and the purposes for which it may be managed, particularly for papakainga housing</td>
</tr>
</tbody>
</table>

Table 46: Summary of Effectiveness and Efficiency of the Deferred Living Group

Resulting from this evaluation, it is recommended that for the purposes of determining how most effectively and efficiently to provide for the relation of Maori, their culture and traditions, the City Council engage with the trustees of Nga Hau E Wha National Marae, the beneficial owners of the ancestral land and the appropriate representatives of Ngai Tahu.

\textsuperscript{282} North of Spencerville
### 6.8.6 Addendum: Summary of the City Plan for the Tangata Whenua Group

<table>
<thead>
<tr>
<th>Objectives</th>
<th>Key Provisions</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Tangata Whenua Objective</strong></td>
<td></td>
</tr>
<tr>
<td>The management of the City's natural and physical resources, taking into account the principles of the Treaty of Waitangi.</td>
<td></td>
</tr>
<tr>
<td><strong>Specific objective</strong></td>
<td>Key AERS</td>
</tr>
<tr>
<td>5.1 To recognize the importance of, and provide for, the relationship of Maori, their culture and traditions with ancestral lands, waters, sites, waahi tapu and other taonga.</td>
<td>1. Recognition of Maori values.</td>
</tr>
<tr>
<td>5.2 The facilitation of Maori community development</td>
<td>2. Active participation of Tangata Whenua in land management.</td>
</tr>
<tr>
<td><strong>Policy areas</strong></td>
<td>3. Enhancement of mahinga kai.</td>
</tr>
<tr>
<td>2. Water</td>
<td>5. Identification of places of special significance to Tangata Whenua.</td>
</tr>
<tr>
<td>3. Traditional resources</td>
<td>6. Opportunities for a diversity of educational, health, community facilities, housing.</td>
</tr>
<tr>
<td>6. Housing</td>
<td></td>
</tr>
<tr>
<td>7. Marae</td>
<td></td>
</tr>
<tr>
<td>8. Nga Hau E Wha National Marae</td>
<td><strong>Zone description and purpose</strong></td>
</tr>
<tr>
<td></td>
<td>None</td>
</tr>
<tr>
<td><strong>Zone AERS</strong></td>
<td>None</td>
</tr>
</tbody>
</table>
6.9 Travellers Accommodation

6.9.1 Summary

The primary focus of the City Plan with respect to the travellers’ accommodation group is to recognise existing travellers’ accommodation activities in the living zones and provide for the continuation of these while protecting the character and integrity of the surrounding residential areas.

The City Plan is highly effective in recognising travellers’ accommodation activities. Other activities are establishing in this zone, reducing the opportunity for the established activities. However, assumed that this is either directly supported by the established activity or as a result of land ownership being with other parties. Either way, it does not affect the established activity unless it results in reverse sensitivity effects. This cannot be ascertained from the information available.

The City Plan is of unchanged efficiency. While resource consents are being required, this is to be expected given the potential interface issues with the adjoining living zones.

Finally, between 2000 and 2010 areas of new travellers accommodation has developed in living zones outside the Living 5 Zone areas. This creates internal consistency issues within the City Plan. However, when resolving the inconsistencies it will be important that the effectiveness of the current control of the effects of these activities on the surrounding living zones is not reduced.

It is recommended that:

1. Consideration is given to extending the Living 5 Zone over the newly established activities.
2. The Living 5 Zone is removed from locations now used for residential purposes.

6.9.2 Introduction

The travellers’ accommodation area incorporates those residential areas of Christchurch City where travellers’ accommodation largely already exists. It is made up of the Living 5 (Travellers Accommodation) Zone and is located as shown in Figure 40.

In summary, the City Plan seeks to recognise these established activities and provide for the continuation of these while protecting the character and integrity of the surrounding residential areas.

In this section: outcomes from interviews with key City Council staff are recorded; using these interviews, available data and site visits, effectiveness and efficiency is

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283 Defined in the City Plan as means the use of land and buildings for transient residential accommodation offered for a daily tariff, which may involve the sale of liquor to in-house guests and the sale of food, and liquor in conjunction with food, to both the public and in-house guests. Travellers’ accommodation includes motels, holiday flats, motor and tourist lodges and hostels.

284 The City Plan lists eleven areas in the zone description but we can think of at least one more associated with Awatea (Volume 3, Part 3, 1.11).
6.9.3 Interviews with City Council Staff

City Council staff are experienced in working with and implementing the City Plan in relation to tourist accommodation. We interviewed key staff from plan policy and plan administration.

Staff observed that the Living 5 Zone primarily recognised only existing travellers’ accommodation and provided little opportunity for new travellers’ accommodation facilities to establish within the very zone that recognised and provided for that activity. This resulted in travellers’ accommodation establishing out of the Living 5 Zone, generally land zoned for living purposes having frontage on arterial roads. While a resource consent is required to establish in a living zone, travellers’ accommodation is considered as being another form of residential accommodation and, therefore, generally acceptable in living zones. Further, bulk and location rules are comparable, if not more restrictive, to those that apply to residential buildings. Therefore the form, scale and intensity of the tourist accommodation development is generally viewed as being compatible with development occurring in Living Zones. However, some consideration should be given to the extent of impervious surfacing, signage and landscaping along the frontage of sites – characteristics that are seen as potentially resulting in some tension with surrounding residential properties.

6.9.4 The Effectiveness and Efficiency

The effectiveness and efficiency of the City Plan is determined by how well, and at what cost, it provides for the continuation of existing traveller accommodation activities while protecting the character and integrity of the surrounding residential areas.

Approximately 100 resource consent applications within the Living 5 Zone were processed between 2000 and 2010. Approximately 50% of the applications are located within the Inner City. Fifty percent are identified as limited discretionary activities, and 20% as discretionary and non-complying activities respectively. Ten applications were processed as a notified application or served on other parties. Only one application was declined.

From the descriptions associated with the individual resource consent applications, approximately one third of the applications relate to accommodation and closely aligned activities, such as bars and restaurants. New residential activities and low level commercial activities account for another third of the applications, roughly in equal proportions. Elderly persons housing and rest home accounted for another ten percent. The remainder of the applications relate to signs and other miscellaneous matters such as work relating to protected heritage buildings.

From field collaboration, many of the residential and non-accommodation activities are integrated as part of, or co-habitat with, travellers’ accommodation activities. The elderly persons housing and rest homes are generally discrete activities, with no pattern as to their location.

Between 2000 and 2010 new areas of multiple individual travellers accommodation has established in living zones outside the Living 5 Zone areas. Along Riccarton Road is one example. It is indistinguishable from the travellers’ accommodation within the Living 5 Zone. Given the purpose of the Living 5 Zone, we recommend that consideration is given to extending the Living 5 Zone over locations with significant new travellers’ accommodation activities. However, when doing so it will be important to ensure that the effectiveness of the current control of the effects on the surrounding living zones of any travellers’ accommodation recognised is not reduced. Further, where land use is no longer associated with travellers’ accommodation, the Living 5 Zone be removed.

Overall, the Living 5 Zone is providing for the recognised travellers’ accommodation activities. While consents are being required, this is to be expected given the potential interface issues with the adjoining living zones. Other activities are establishing in this zone, reducing the opportunity for the
established activities. However, assumed that this is either directly supported by the established activity or as a result of land ownership being with other parties. Either way, it does not affect the established activity unless it results in reverse sensitivity effects. This cannot be ascertained from the information available.

6.9.5 Summary of Effectiveness and Efficiency

The effectiveness and efficiency of City Plan policies, rules, or other methods in achieving its objectives is summarised in Table 47.

<table>
<thead>
<tr>
<th>Objective</th>
<th>Effectiveness</th>
<th>Efficiency</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Outcome</strong></td>
<td><strong>Effectiveness</strong></td>
<td><strong>Comment</strong></td>
</tr>
<tr>
<td>11.3 Non-residential activities</td>
<td>Medium</td>
<td>Tourist accommodation is being provided for, but is there is evidence of other activities occurring within the zone, and tourist accommodation occurring outside of the zone.</td>
</tr>
<tr>
<td>11.4 Adverse environmental effects</td>
<td>High</td>
<td>Largely managed through individual consent processes</td>
</tr>
<tr>
<td>11.5 External appearance</td>
<td>High</td>
<td>Largely managed through individual consent processes</td>
</tr>
</tbody>
</table>

Table 47: Summary of Effectiveness and Efficiency of the Deferred Living Group

Resulting from this evaluation, it is recommended:

1. Consideration is given to extending the Living 5 Zone over the newly established activities.  
2. The Living 5 Zone is removed from locations now used for residential purposes.
### 6.9.6 Addendum: Summary of the City Plan for the Tourist Accommodation Group

<table>
<thead>
<tr>
<th>Objectives</th>
<th>Key Provisions</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Living Objective</strong></td>
<td><strong>Key AERS</strong> Volume 2, Section 11 Living</td>
</tr>
<tr>
<td>A quality living environment that meets the differing needs of the City's population</td>
<td>1. The maintenance of the residential coherence of living areas.</td>
</tr>
<tr>
<td><strong>Specific objectives</strong></td>
<td>2. Meeting the accommodation needs of travellers and visitors to the City while safeguarding residential amenity values.</td>
</tr>
<tr>
<td>11.3 Non-residential activities located within living areas which meet community needs, and are consistent with maintaining a high standard of amenity in living areas.</td>
<td><strong>Zone description and purpose</strong> Recognises existing establishments and the continued provision of these facilities for tourists while ensuring the character and integrity of residential area is retained. Future development requires high standard of visual amenity and landscaping to complement adjoining living zones.</td>
</tr>
<tr>
<td>11.4 A living environment that is pleasant and within which adverse environmental effects on amenity values are avoided remedied or mitigated, while still providing the opportunity for individual and community expression.</td>
<td></td>
</tr>
<tr>
<td>11.5 Good quality building and site designed to achieve a high level of amenity throughout the living areas of the City.</td>
<td></td>
</tr>
<tr>
<td><strong>Policy areas</strong></td>
<td><strong>Zone AERS</strong></td>
</tr>
<tr>
<td></td>
<td>2. Accommodation with frontage onto main roads or close to city centre.</td>
</tr>
<tr>
<td></td>
<td>3. Containment of effects at zone boundaries.</td>
</tr>
<tr>
<td></td>
<td>4. Minimise adverse environmental effects on the living areas.</td>
</tr>
<tr>
<td></td>
<td>5. Medium density and scale of activities.</td>
</tr>
<tr>
<td></td>
<td>6. Range of associated activities compatible with living areas.</td>
</tr>
<tr>
<td></td>
<td>7. Moderate levels of traffic generation.</td>
</tr>
<tr>
<td></td>
<td>8. Landscaping provision.</td>
</tr>
<tr>
<td></td>
<td>9. Noise levels maintained at zone boundaries.</td>
</tr>
<tr>
<td></td>
<td>10. Building height compatible with living areas.</td>
</tr>
</tbody>
</table>
6.10 Utilities Group

6.10.1 Summary

The primary focus of the City Plan with respect to utilities is the timely and co-ordinated provision of utilities, which are used efficiently, while controlling the adverse effects of utilities on the environment.

The City Plan is highly effective in ensuring development serviced for by utilities (i.e. provision and efficient use of utilities) are a result of the processes relating to rezoning for urban growth and subdivision. It is also of medium effectiveness in controlling the adverse effects of new, and the upgrading of existing, utilities. This is because the City Plan rule complexity reduces the ability to effectively and consistently administer them.

The City Plan is of reduced efficiency. This is a result of the large number of communication utilities related resource consents, which are typically granted on a non-notified basis and the overlap with the Resource Management (National Environmental Standards for Telecommunication Facilities) Regulations 2008.

It is recommended that:

1. The City Council review the communication related rules to reduce the circumstances where resource consents are required, which may include aligning the rules with Council’s internal policy on utilities within Council reserves.


6.10.2 Introduction

The utilities group is a City-wide group that incorporates those City Plan provisions relating to the control of utilities. Utilities are defined within the City Plan in a manner which is broadly consistent with the definition of utility operators within the RMA. This definition largely covers piped, wired and otherwise connected communication, water, sewerage gas, and electricity infrastructure. Therefore, a number of the utilities are services provided directly by the City Council, and others are provided by the private sector of other forms of enterprises. Therefore, the utilities provisions cover a wide range of service provision.

The primary objective of the City Plan with respect to utilities is the provisions of efficient and environmental sensitive utilities for servicing and developing the City. The outcome the City Plan is seeking is the timely and co-ordinated provision of utilities, which are used efficiently, while controlling the adverse effects of utilities on the environment.

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285 For example, potable water, sewerage and stormwater.
286 For example, telecommunications.
287 For example, electricity reticulation by Orion.
288 Volume 2, Section 8.
Ensuring development is serviced by utilities (i.e. provision and efficient use of utilities) is managed through two processes:

1. the zoning of new areas for urban growth
2. the subsequent subdivision provisions in the City Plan.

Controlling the adverse effects of new, and the upgrading of existing, utilities is achieved by the general city rules. These include specific utility rules and waterway rules. The waterway rules are considered in the ‘Filling and excavation group’.

There are a number of influencers of the effectiveness and efficiency of the utilities provisions within the City Plan. These include:

1. The variety of government, quasi government and private agencies which provide utilities within the City
2. The competitive model through which communication utilities are provided in New Zealand
3. The separation between the Resource Management Act (and hence the City Plan) and other legislation which empowers the delivery of utilities
4. The use of development contributions under the Local Government Act, instead of financial contributions under the City Plan, to fund the development of Council utilities to service development

Together, these mean that the function of the City Plan is to:

1. Control new development so that it is located where it will be serviced by the various utility providers
2. Control the adverse effects of the provision of utilities, but not telecommunication facilities in road reserves.

In this section: outcomes from interviews with key City Council staff are recorded; using these interviews, available data and site visits, effectiveness and efficiency is considered; the main findings and recommendations are set out, and finally an addendum is included summarising the relevant City Plan provisions.

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289 The City Plan provisions in relation to urban growth are considered in the ‘Urban Growth group’.
290 Volume 3, Part 9, 4.0 Utilities.
291 Volume 3, Part 9, 5.0 Filling, excavation and buildings adjacent to waterways.
6.10.3 Interviews with City Council Staff

City Council staff are experienced in working with and implementing the City Plan in relation to utilities. We interviewed key staff from plan policy and plan administration.

The provisions of utilities, generally council services, at time of subdivision consent are working satisfactorily.

The utilities rules are overly complicated, contradictory and difficult to understand for both plan administrator and plan user. This is partly due to the form and style of the rules being influenced by the utility operators at the time of rule writing. Recent regulation results in tensions with the City Plan rules. A Plan Change is needed to address the above inconsistencies.

Council internal policy enables the establishment of suitable utilities within Council parks and reserves and on road reserves. In a number of circumstances resource consent applications are still required. This results in a perception that the City Plan is out-of-step with the Council internal policy.

6.10.4 Effectiveness and Efficiency

The effectiveness and efficiency of the City Plan is determined by how well, and at what cost, it enables the provision of utilities and controls the adverse effects which may arise.

To some extent, as a result of Section 43B of the Resource Management Act, the Resource Management (National Environmental Standards for Telecommunication Facilities) Regulations 2008 make parts of the City Plan redundant by directly controlling telecommunication facilities. In summary, these regulations provide:

1. An activity (such as a mobile phone transmitter) that emits radio-frequency fields is a permitted activity provided it complies with the existing New Zealand Standard (NZS2772.1:1999 Radio-frequency Fields Part 1: Maximum Exposure Levels 3kHz-300GHz).

2. The installation of telecommunications equipment cabinets along roads or in the road reserve is a permitted activity, subject to specified limitations on their size and location.

3. Noise from telecommunications equipment cabinets located alongside roads or in the road reserve is a permitted activity, subject to specified noise limits.

4. The installation of masts and antennas on existing structures alongside roads or in the road reserve is a permitted activity, subject to specified limitations to height and size.

The first matter effectively replaces the permitted activity proportion of Rule 4.4.6, but is largely consistent with that rule. Within the road reserve the regulations effectively replace parts of Rules 4.4.1, 4.4.2 and 4.4.3.

Data is not available that allows the consideration of the effectiveness and efficiency of the subdivision process in achieving the appropriate provisions of utilities. Staff consider this process is working effectively.

Between 2000 and 2010, approximately 230 resource consent applications were made relating to utilities, for approximately 130 properties. Of these properties, approximately 50% are located in a

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294 Unique RMA numbers with an RMA type relating to a resource consent application.
business zone, with the remainder being relatively evenly split between various conservation, cultural, living, open space, rural and special purpose zones. Many of these sites will be Council owned.

By examining the descriptions, the large majority of the resource consent applications relate to communications, with very small numbers to council asset management, electricity reticulation and electricity generation activities. This is reinforced by an examination of the non-compliance codes, with approximately 45% of the listed codes relating to telecommunication and radio communication facilities rule and a further 30% to the electromagnetic radiation rule. The remainder of the non-compliance codes are relatively evenly split between the lines and supporting structures, landscaping other utilities structures rules.

Approximately 30% of the resource consent applications are recoded and being a non-complying activity, 30% as a discretionary activity. All the resource consent applications were granted. Only three applications were publicly notified, all in the 2000 and 2001 period, and two applications treated on a limited notified basis.

Overall, utilities are establishing within the City. The effectiveness of the City Plan is reduced because its rules have effectively been superseded for telecommunication facilities in road reserves by the Resource Management (National Environmental Standards for Telecommunication Facilities) Regulations 2008, and are difficult to administer. It is not clear what proportion of utilities established between 2000 and 2010 required resource consent. Where consent was sought, irrespective of location, these were granted and generally on a non-notified basis. This indicates either, or both:

1. The utility providers are carefully selecting specific locations where the effects of the utilities are acceptable.

2. The City Plan rules are resulting in unnecessary resource consent processes.

What cannot be determined is the interrelationship between these two matters. It may be that site selection is rigorous because of the need to seek resource consent.

With respect to the electromagnetic radiation rule it is noted that this is based on current New Zealand standards, which is typically an indication that the level of control is generally appropriate.

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295 But not within the Special Purpose (Road) Zone.
296 Volume 3, Part 9, Rules 4.4.3 and 4.4.6 respectively.
297 Volume 3, Part 9, Rules 4.4.1, 4.4.2, 4.4.4 and 4.4.5.
298 Two which did not comply with the electromagnetic radiation rule and one with the telecommunication and radio communication facilities rule.
6.10.5 Summary of Effectiveness and Efficiency

The effectiveness and efficiency of City Plan policies, rules, or other methods in achieving its objectives is summarised in Table 52.

<table>
<thead>
<tr>
<th>Objective</th>
<th>Effectiveness</th>
<th>Efficiency</th>
</tr>
</thead>
<tbody>
<tr>
<td>8.1 Provision of utilities</td>
<td>High</td>
<td>All new development is being provided with utilities, Reduced (The provisions lack clarity, duplicate regulation and are resulting in a high number of consents for communication utilities)</td>
</tr>
<tr>
<td>8.2 Efficient utilities</td>
<td>Medium</td>
<td>Efficient utilities are dealt with in the land development process, but the City Plan cannot influence wider efficiency considerations</td>
</tr>
<tr>
<td>8.3 Adverse environmental effects</td>
<td>Medium</td>
<td>Utilities are not know to be causing inappropriate effects on the environment, but the utility provisions lack clarity and conflict with recent regulation</td>
</tr>
<tr>
<td>10.4 Anticipated land uses</td>
<td>Unknown, but assumed to be Medium</td>
<td>All new development is being provided with utilities (services), but development contributions are now taken under the Council’s Development Contribution Policy</td>
</tr>
</tbody>
</table>

**Table 48: Summary of Effectiveness and Efficiency of the Utilities Group**

Resulting from this evaluation, it is recommended:

1. The City Council review the communication related rules to reduce the circumstances where resource consents is required, which may include aligning the rules with Council’s internal policy on utilities within Council reserves.

### 6.10.6 Addendum: Summary of the City Plan for the Utilities Group

<table>
<thead>
<tr>
<th>Utilities Objective</th>
<th>Key Provisions</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>The provision of efficient and environmentally sensitive utilities for servicing and developing the City.</strong></td>
<td><strong>Key AERS</strong></td>
</tr>
<tr>
<td><strong>Subdivision and development objective</strong></td>
<td><strong>Volume 2, Section 8, Utilities</strong></td>
</tr>
<tr>
<td>That the values and functioning of natural and physical resources are maintained when the process of land subdivision and/or development takes place, recognising anticipated land use activities.</td>
<td>1. Development of areas more easily able to be serviced.</td>
</tr>
<tr>
<td><strong>Specific Objective</strong></td>
<td>2. Efficient and cost-effective development.</td>
</tr>
<tr>
<td>8.1 Co-ordination of the provision of utilities with development in the City.</td>
<td>3. Intensification of development where excess capacity exists.</td>
</tr>
<tr>
<td>8.2 Efficient use of the city's utilities.</td>
<td>4. Higher residential densities reflecting servicing costs, consolidation and economies of scale.</td>
</tr>
<tr>
<td>8.3(a) avoid, remedy or mitigate the adverse effects of utilities on their surrounding environments, particularly those in living areas or areas of high landscape value; and</td>
<td>5. Further sewer and water reticulation in rural areas.</td>
</tr>
<tr>
<td>8.3(b) avoid, remedy or mitigate the adverse effects of utilities that generate significant levels of low frequency magnetic fields or radio frequency radiation.</td>
<td>6. Solid waste, sewage, storm water disposal protecting water resource, amenity values, land of high landscape and natural values.</td>
</tr>
<tr>
<td>10.4 Before new certificates of title are issued for land that has been subdivided, or land use development proceeds, the effects of the anticipated land use activities for which the subdivision or development is undertaken shall be taken into account, and the necessary supporting framework of services and contributions shall be provided.</td>
<td>7. Opportunities for new and developing utility technologies.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Policy areas.</th>
<th>Zone description and purpose</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Section 8</strong></td>
<td><strong>Utilities are essential to the servicing and functioning of the city. City Plan thresholds are set to allow small-scale essential utilities to establish without delay but require resource consent when impacts of utilities significant. The effects are mainly visual.</strong></td>
</tr>
<tr>
<td>1. Areas of new development</td>
<td><strong>Zone AERS</strong></td>
</tr>
<tr>
<td>2. Infill and redevelopment</td>
<td>1. Economic provision of utilities.</td>
</tr>
<tr>
<td>3. Servicing prior to occupation</td>
<td>2. Minimise the visual impact of overhead lines.</td>
</tr>
<tr>
<td>4. Treatment and disposal</td>
<td>3. Locate utilities which minimise their visual effects.</td>
</tr>
<tr>
<td>6. Priorities for servicing</td>
<td>5. Minimise loss of natural values in environmentally sensitive areas.</td>
</tr>
<tr>
<td>8. Waste disposal</td>
<td><strong>Under grounding and upgrading of services</strong></td>
</tr>
<tr>
<td>9. Reduction of wastes</td>
<td><strong>Location, design and appearance</strong></td>
</tr>
<tr>
<td>10. Sustainable water supply</td>
<td><strong>Large utilities</strong></td>
</tr>
<tr>
<td>11. Advanced technologies</td>
<td><strong>Waterways.</strong></td>
</tr>
<tr>
<td>12. Controls on the utilities</td>
<td><strong>Waterways.</strong></td>
</tr>
<tr>
<td>13. Under grounding and upgrading of services</td>
<td><strong>Waterways.</strong></td>
</tr>
<tr>
<td>14. Adverse effects</td>
<td><strong>Waterways.</strong></td>
</tr>
<tr>
<td>15. Location, design and appearance</td>
<td><strong>Waterways.</strong></td>
</tr>
<tr>
<td>16. Large utilities</td>
<td><strong>Waterways.</strong></td>
</tr>
<tr>
<td>17. Waterways.</td>
<td><strong>Waterways.</strong></td>
</tr>
<tr>
<td><strong>Section 10</strong></td>
<td><strong>Waterways.</strong></td>
</tr>
<tr>
<td>1. Water supply</td>
<td><strong>Provision of Works and Services, Financial and Development Contributions</strong></td>
</tr>
<tr>
<td>2. Stormwater disposal</td>
<td><strong>Provision of Works and Services, Financial and Development Contributions</strong></td>
</tr>
<tr>
<td>3. Sewage disposal</td>
<td><strong>Provision of Works and Services, Financial and Development Contributions</strong></td>
</tr>
<tr>
<td>4. Provision of energy</td>
<td><strong>Provision of Works and Services, Financial and Development Contributions</strong></td>
</tr>
<tr>
<td>5. Telecommunications</td>
<td><strong>Provision of Works and Services, Financial and Development Contributions</strong></td>
</tr>
<tr>
<td>6. Roading and access.</td>
<td><strong>Provision of Works and Services, Financial and Development Contributions</strong></td>
</tr>
<tr>
<td>7. Provision of Works and Services, Financial and Development Contributions</td>
<td><strong>Provision of Works and Services, Financial and Development Contributions</strong></td>
</tr>
</tbody>
</table>
6.11 Waste Group

6.11.1 Summary

The primary focus of the City Plan with respect to the waste group is to reduce the amount of waste produced within the City. What waste is to be disposed of is to be handled through the operation and maintenance of transfer stations, landfill sites and other environmentally appropriate facilities.

At the policy level, the City Plan addresses all aspects of waste management, but primarily takes a non-regulatory approach to the implementation of these. The exception is rules which control the adverse effects on the environment of fill and hazardous substances management and special purpose zones and rules which provide for Burwood Landfill and the Styx Mill transfer station and resource recovery centre.

The available information indicates that the amount of waste being sent to landfill in 2009 is similar to that being sent in 2000. However, on a per person basis, the amount of waste being sent has reduced. The influence of the City Plan on this is low. There are more significant drivers of this trend, as demonstrated by Towards Zero Waste: Waste Management Plan 2006.

The City Plan is now dated with respect to the Special Purpose (Landfill) Zone. As this landfill is now closed, part of the purpose of this zone is no longer relevant.

The City Plan is of unknown efficiency. This is because of the low level of waste management activities identified as occurring within the City.

It is recommended that:

1. The waste provisions are reviewed to create a greater focus on those matters that the City Plan can effectively influence.

2. The Special Purpose (Landfill) Zone is reviewed and either updated to reflect the landfill is closed or an alternative zone is applied to this land reflecting its intended future use.

6.11.2 Introduction

The waste group incorporates is a City-wide group that incorporates those City Plan provisions relating to the management of waste, including waste management, waste disposal and hazardous waste.

The primary waste objective is the general natural environment objective, which is maintenance and enhancement of the quality of natural resources and their ability to meet the needs if present and future generations. At the policy level the City Plan addresses all aspects of waste management, but primarily takes a non-regulatory approach to the implementation of these. The exception is:

1. Rules which control the adverse effects on the environment of fill and hazardous substances management.

2. Special purpose zones and rules which provide for Burwood Landfill and Styx Mill transfer station and resource recovery centre.

See Volume 2, Part 2, Policies 2.1.3, 2.1.4 and 2.1.5.

Volume 2, Section 2

See the ‘Fill and excavation group’.
It is noted that the Parkhouse and Bromley transfer stations are located in the Business 5 Zone.

The City Plan seeks a reduction in the amount of waste produced within the City, with a focus on the '5 Rs' waste management hierarchy. What waste is to be disposed of is to be handled through the operation and maintenance of transfer stations, landfill sites and other environmentally appropriate facilities.

Since the year 2000:

1. Burwood landfill has been closed and Kate Valley Landfill (in Hurunui District) opened.\(^\text{304}\)

2. The City Council has prepared and adopted various waste management and action plans culminating in *Towards Zero Waste: Waste Management Plan 2006*.

In this section: outcomes from interviews with key City Council staff are recorded; using these interviews, available data and site visits, effectiveness and efficiency is considered; the main findings and recommendations are set out, and finally an addendum is included summarising the relevant City Plan provisions.

### 6.11.3 Interviews with City Council Staff

City Council staff are experienced in working with and implementing the City Plan in relation to the waste provisions. We interviewed key staff from plan policy and plan administration.

The Special Purpose (Landfill) Zone is redundant as the landfill is closed. This section in the City Plan is no longer required and the City Plan should be updated to reflect this. In addition, the current policy approach\(^\text{305}\) to waste should be reviewed. Other mechanisms outside of the City Plan such as the adoption of a Waste Management Plan Strategy for the City are considered more effective at achieving the desired waste outcomes. Overall, these sections of the City Plan are viewed as not being particularly meaningful or useful to achieving the stated outcomes.

### 6.11.4 Effectiveness and Efficiency

The effectiveness and efficiency of the City Plan is determined by how well, and at what cost, it controls development in order to achieve reduction in waste produced, the management of waste and the control of the resultant adverse effects on the environment.

As shown in Figure 41, the amount of waste being sent to landfill in 2009 is similar to that being sent in 2000\(^\text{306}\). However, on a per person basis, the amount of waste being sent has reduced. In part, this is a result of increased recycling\(^\text{307}\).

The City Plan does not directly control the use, development or protection of land for the purposes of reducing waste within Christchurch. There are more significant drivers of this trend, as demonstrated by *Towards Zero Waste: Waste Management Plan 2006*. While this is a non-regulatory method to achieve the policies of the City Plan, there is no statutory relationship between it and the City Plan.

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\(^\text{302}\) Special Purpose (Landfill) Zone.

\(^\text{303}\) Special Purpose (Transfer) Zone.

\(^\text{304}\) In 2005.

\(^\text{305}\) Achievement of the 5 'Rs' Strategy namely: reduce, reuse, recycle, recovery and residual disposal.


\(^\text{307}\) The tonnage of green waste composted in 2009 is similar to 2000. See the CCC’s Composted Waste Indicator.
Between 2000 and 2010:

1. No resource consents were sought within the Special Purpose (Landfill) Zone, although in 2004 a consent was granted on a non-notified basis to realign the access road to the landfill.

2. Five resource consents were sought and granted (four on a non-notified basis) in the Special Purpose (Transfer Station) Zone. Of these, only two related to the operation of the transfer station (both granted on a non-notified basis), with the remainder relating to telecommunications.

3. Outside of the above areas, six resource consent applications have the word ‘waste’ or ‘landfill’ in the description, all of which were granted on a non-notified basis. Of these four were located in the Business 5 Zone, one in each of the in the Business 4 and Special Purpose (Ferrymead) zones.

From the available information, there is no evidence of the regulatory provisions in the City Plan resulting in ineffective or inefficient provision for, and management of effects from, waste management and disposal activities.

The City Plan is now dated with respect to the Special Purpose (Landfill) Zone. While this area is being actively managed as part of the closure of the landfill, it is no longer providing for the disposal of waste (except as part of the closure process). Therefore, part of the purpose of this zone is no longer relevant.

The City Plan is of unknown efficiency. This is because of the low level of interaction between the City Plan and the waste management activities which are occurring.

**Figure 41: Waste to Landfill**
6.11.5 Summary of Effectiveness and Efficiency

The effectiveness and efficiency of City Plan policies, rules, or other methods in achieving its objectives is summarised in Table 49.

<table>
<thead>
<tr>
<th>Objective</th>
<th>Effectiveness</th>
<th>Efficiency</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.1 Land and soil</td>
<td>Low/Medium</td>
<td></td>
<td>The City Plan has very limited influence over waste minimisation practices, but does control the adverse effects of waste handling and disposal</td>
</tr>
<tr>
<td>8.2 Efficient Utilities</td>
<td>High</td>
<td></td>
<td>Waste is effectively being managed</td>
</tr>
</tbody>
</table>

Table 49: Summary of Effectiveness and Efficiency of the Waste Group

Resulting from this evaluation, it is recommended:

1. The waste provisions are reviewed to create a greater focus on those matters that the City Plan can effectively influence.

2. The Special Purpose (Landfill) Zone is reviewed and either updated to reflect the land fill is closed or an alternative zone is applied to this land reflecting its intended future use.
## 6.11.6 Addendum: Summary of the City Plan for the Waste Group

<table>
<thead>
<tr>
<th>Objectives</th>
<th>Key Provisions</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Natural Environment Objective</strong></td>
<td><strong>Key AERS</strong></td>
</tr>
<tr>
<td>Maintenance and enhancement of the quality of natural resources and their ability to meet the needs of present and future generations.</td>
<td>Volume 2, Section 2, Natural Environment</td>
</tr>
<tr>
<td><strong>Specific objectives</strong></td>
<td><strong>Zone description and purpose</strong></td>
</tr>
<tr>
<td>2.1 To maintain and enhance those physical, chemical and biological characteristics of land and soils, and the ecosystems they contain, in a way that best enables them to support life and provide for community needs.</td>
<td>Special Purpose (Landfill)</td>
</tr>
<tr>
<td></td>
<td>Provides for staged filling of land from transfer stations.</td>
</tr>
<tr>
<td></td>
<td><strong>Special Purpose (Transfer Station)</strong></td>
</tr>
<tr>
<td></td>
<td>To recognize and provide for the Styx Mill transfer station within its surrounding rural and living environment.</td>
</tr>
<tr>
<td><strong>Zone AERS</strong></td>
<td></td>
</tr>
<tr>
<td>Special Purpose (Landfill)</td>
<td>1. Avoid groundwater contamination.</td>
</tr>
<tr>
<td></td>
<td>2. Segregated from residential activities.</td>
</tr>
<tr>
<td></td>
<td>3. Area progressively restored by resoiling and planting.</td>
</tr>
<tr>
<td></td>
<td>4. Minimizes visual, dust, odour, noise effects.</td>
</tr>
<tr>
<td>Special Purpose (Transfer Station)</td>
<td>1. The continued collection, compaction, recovery and disposal of refuse at the Styx Mills Transfer Station.</td>
</tr>
<tr>
<td></td>
<td>2. Maintenance of intensive landscaping around the perimeter.</td>
</tr>
<tr>
<td></td>
<td>3. Minimal impact from noise, odour, dust, birds, and windblown refuse.</td>
</tr>
<tr>
<td><strong>Policy areas</strong></td>
<td>1. Waste management.</td>
</tr>
<tr>
<td></td>
<td>2. Waste disposal.</td>
</tr>
</tbody>
</table>
7 EFFICIENCY AT THE CITY PLAN LEVEL

7.1 Summary

The efficiency of the City Plan is a measure of the net cost of the implementation of its policies and methods. This evaluation focuses on the efficiency of the City Plan as a whole. It examines changes in compliance costs directly resulting from the City Council, using the cost external parties’ pay for consents as an indicator of change in efficiency. Consent processing practice is also considered as an indicator to efficiency.

The efficiency of the City Plan has decreased over time for the simple reason that compliance costs have increased significantly faster than the rate of inflation.

Further, the City Plan is resulting in a significant number of resource consent applications being processed on a non-notified basis, regardless of whether a development, community or critical standard is breached. It is not clear whether the issue relates to efficiency or effectiveness, or both. What it suggests is the permitted activity thresholds may be:

1. In a general sense, set too strictly resulting in unnecessary processes (i.e. less than optimum efficiency).
2. Set too generally and need to better reflect different types of development (i.e. less than optimum efficiency).
3. Not appropriately supported by the related City Plan provisions such as the relevant policies, assessment matters or activity status (i.e. less than optimum effectiveness).

It is recommended that:

1. The role of development, community and critical standards in the City Plan is reviewed to ensure that if the cascade rule system remains there is a sharper differentiation between the role of each type of standards.
2. The permitted activity rule thresholds are reviewed for the purpose of reducing the number of resource consent applications treated on a non-notified basis.
3. The Council implement a comprehensive monitoring programme to better understand changes in efficiency of the City Plan.

The logic is that the resource management benefits of resource consent processes have not increased over time, but the compliance costs have, being an indicator of an increase in total costs. Consequently, the net benefit/cost has decreased, hence efficiency has reduced.
7.1.1 Introduction

The efficiency of the City Plan is a measure of the net cost of the implementation of its policies and methods. Efficiency is about the relationship between inputs and outputs, or in resource management language, benefits and costs. Often efficiency is undertaken in a relative sense between two different scenarios. This chapter addresses the efficiency component of the evaluation at the overall City Plan level. The focus is on the trends in administrative processes and compliance costs associated with the implementation of the City Plan.

Changes in administrative processes and compliance costs are used as indicators for changes in efficiency. Overall, the evaluation is whether the efficiency of the City Plan:

1. Remained constant over the period.
2. Increased over the period.
3. Decreased over the period.

This evaluation focuses on trends that indicate change. Its purpose is not to examine, and it does not answer, why changes in efficiency occurred.

At the outset, it was anticipated that the focus of the efficiency evaluation would examine:

1. Changes in administration costs – this include changes in the City Council costs in processing typical resource consent applications.
2. Unnecessary processes – focusing on duplication of processes.
3. Changes in compliance costs – while compliance costs include all costs to applicants, for the purpose of this evaluation changes in the Council’s fees and charges and invoicing of actual and reasonable costs are the focus.

With respect to administration costs, the available data has many limitations and is not useful to provide reliable trends. Further, changes in administrative costs may be partly a reflection in changes in economic activity and in response to different public/private good funding decisions made by the Council. If it is the latter, it is possible a corresponding change in compliance costs will also be observed. Therefore, there is no evaluation of change in administrative costs.

Unnecessary processes are identified in the individual group evaluations.

Therefore, the evaluation focuses on changes in compliance costs. Compliance costs include all private costs incurred in achieving compliance with the City Plan, whether by an applicant or submitter. For this evaluation, information is only available about compliance costs imposed by the Council in the form of resource consent processing costs. These are used as an indicator. Further, consent processing practice is also used as an indicator.

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309 The 13 April 2010 methodology set out the background and reasons why an economic cost/benefit approach is not being used to evaluate the City Plan.
310 Factors explored include: changes in the internal business units delivering the activities over the period but changes of activity classifications and line items in budgets over the period meaning year-on-year comparisons could not be made; changes in funding inputs, including cost recovery requirements but there is an inability to determine input of external consultants processing consents in combination with staff hours relative to overall consent numbers; changes in the staff hour inputs with differences in the inclusions from other units on a year-by-year basis affecting relativity on a year by year basis but changes in the way staff hourly rates are determined and changed over the period cannot be accounted for.
In undertaking the efficiency evaluation data is used from three primary sources being:

1. Information provided by the Plan Administration section of Council (this data was for the period 2005-2010) including:
   a. Overall consent numbers of notified and non-notified consents
   b. Average costs of notified and non-notified consents
   c. Staff hours
   d. Staff costs
   e. Overall revenue associated with notified and non-notified consents.
3. Information from other publicly available data sources including:
   a. Christchurch City Council Annual Reports, Annual Plans and Long Term Council Community Plans throughout the study period
   b. Consumer Price Index (CPI).

Overall, an evaluation of the available data does not provide for a comprehensive evaluation of efficiency. In order to more robustly fulfil the Council's monitoring obligations, this is one area where it is recommended that the City Council develop a comprehensive monitoring programme.

### 7.1.2 Efficiency of the City Plan as a Whole

This section addresses two matters. The first focuses on changes in compliance costs. The second focuses on administrative processes.

#### 7.1.2.1 Changes in Compliance Costs

This evaluation of compliance costs focuses on costs experienced by an applicant for resource consent. In itself an increase or decrease in compliance costs does not indicate an increase or decrease in overall efficiency. The change may reflect a redistribution of overall costs. Notwithstanding this, compliance costs influence overall efficiency of the City Plan provisions. It is therefore reasonable to consider changes in compliance costs as an indicator of efficiency.

Much of the data evaluated does not cover the entire study period. The primary data available is for the period 2005 to 2010. For the period 2001 to 2005, the only available data is the fees and charges set through the Annual Plan process. These do not provide insight into the total Council imposed compliance costs as they exclude additional actual and reasonable costs that an applicant is required to pay at a later date.

Overall, from Table 50 it is evident that there is a significant change in the upfront fees paid when comparing 2001 and 2010.

<table>
<thead>
<tr>
<th>Consent Type (example only)</th>
<th>Minimum Consent Fee</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>00/01</td>
</tr>
<tr>
<td>Sunlight and outlook for neighbours</td>
<td>275.00</td>
</tr>
<tr>
<td>Other non-notified applications</td>
<td>575.00</td>
</tr>
<tr>
<td>Publicly notified</td>
<td>700.00</td>
</tr>
</tbody>
</table>

**Table 50: City Council Consent Application Fees**

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311 Data from earlier years was not available on a basis where it was comparable to the later data sets.
312 The 2008 report is the latest report available. This report identifies that there are limitations in the data. It is not known how these limitations relate to data provided by Christchurch City Council.
313 Section 35(2)(b) of the RMA.
Consideration of the average cost of the Council processing consents provides information on changes in compliance costs. The available data is from the 2005/2006 to 2009/2010 financial years. The data provides the average cost of non-notified and notified resource consents.

As shown in Figure 42, for non-notified consents the increase in the average cost is significantly higher than what would be expected from the CPI trend starting from the same based point of $645.00. The average cost per consent more than doubled from $645.00 in 2005/06 to $1500.00 in 2009/10 and was the highest in 2008/09 at $1715.00.

As shown in Figure 43, for notified consents the average cost per consent is also significantly higher than would be expected from the CPI trend. It more than doubled from just over $8000.00 in 2005/2006 to just under $20,000.00 in 2009/10. The difference between the average cost and CPI trend increases following the 2007/2008 year.

Over this period there were no significant changes in either the City Plan provisions or the RMA that would account for the changes in compliance costs. While this cannot be viewed as showing a change in efficiency, it does demonstrate an underlying increase in costs for applicants. At least with respect to non-notified applications, this is a strong indicator reduction in efficiency of the City Plan.

7.1.2.2 Administration Processes

The number, manner in which resource consents are processed, and the outcome from those processes, are indicators of efficiency.

Christchurch City Council processes significant numbers of resource consent applications each year. It consistently processes the third highest number of consents of all of the territorial authorities in New Zealand. Table 51 summarises the resource consent process for all resource consent non-compliances.

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314 CPI – Consumer Price Index Sources from the New Zealand Reserve Bank, 30 October 2010
Evaluating the effectiveness and efficiency of the Christchurch City Plan

<table>
<thead>
<tr>
<th>Year</th>
<th>Process</th>
<th>TOTAL</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Notified</td>
<td>Non-Notified</td>
</tr>
<tr>
<td>04/05</td>
<td>90</td>
<td>1837</td>
</tr>
<tr>
<td>05/06</td>
<td>67</td>
<td>1757</td>
</tr>
<tr>
<td>06/07</td>
<td>60</td>
<td>1774</td>
</tr>
<tr>
<td>07/08</td>
<td>52</td>
<td>1620</td>
</tr>
<tr>
<td>08/09</td>
<td>48</td>
<td>1171</td>
</tr>
<tr>
<td>09/10</td>
<td>58</td>
<td>1180</td>
</tr>
</tbody>
</table>

Table 51: Resource Consent Processes 2004-2010

From the City Council’s resource consent data-base, Table 52 summarises the resource consent outcomes for activity type across the City Plan as a whole, including subdivision.

<table>
<thead>
<tr>
<th>Process</th>
<th>Outcome</th>
<th>TOTAL</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Granted</td>
<td>Declined</td>
</tr>
<tr>
<td>Non notified</td>
<td>36713</td>
<td>13</td>
</tr>
<tr>
<td>Service</td>
<td>682</td>
<td>29</td>
</tr>
<tr>
<td>Notified</td>
<td>857</td>
<td>80</td>
</tr>
<tr>
<td>Not known</td>
<td>899</td>
<td>18</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>39151 (98%)</strong></td>
<td><strong>140 (0.4%)</strong></td>
</tr>
</tbody>
</table>

Table 52: Resource Consent Process by Outcome 2000-2010

The non-notified row is significant. In law this row represents those non-compliances that the effects on the environment were considered (largely during the study period) de minimis\(^{317}\) for the purposes of determining the process the resource consent application was to follow, or the City Plan had already determined that public notification was not required. It is therefore not surprising that largely all such applications were granted.

Based on the Ministry for the Environment published data\(^{318}\), with respect to notification, limited notification and non-notification, Christchurch City Council has a relatively low percentage of resource consent application processed on a notified basis compared to the average of all local authorities\(^{319}\). Consistently over 97% of all the resource consent applications were not publicly notified. Overall the low percentage of notified applications is considered more likely to be as a result of the high number of overall consents being processed, rather that Christchurch City Council notification practice being out of step with the well-established legal principles for determining notification or limited notification of resource consent applications.

Table 53 shows that proportionally more non-complying activities were publicly notified than any other category of activity status, but even then less amounted to less than 10 percent of all non-complying activity status applications. It also demonstrates that there is no overall preference for applicants to breach community standards instead of critical standards, which may have been expected based on the tougher statutory test for non-complying activities found in Section 104D of the RMA.

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\(^{316}\) Subdivision consents have largely been excluded from this table.

\(^{317}\) *de minimis non curat lex* trifling matters or matters of negligible significance.


\(^{319}\) Ibid, page 11 and page 65.
Evaluating the effectiveness and efficiency of the Christchurch City Plan

<table>
<thead>
<tr>
<th></th>
<th>Controlled</th>
<th>Limited discretionary</th>
<th>Discretionary</th>
<th>Non complying</th>
<th>Unknown</th>
</tr>
</thead>
<tbody>
<tr>
<td>Non notified</td>
<td>3368</td>
<td>21856</td>
<td>4901</td>
<td>6003</td>
<td>170</td>
</tr>
<tr>
<td>Service</td>
<td>0</td>
<td>279</td>
<td>181</td>
<td>255</td>
<td>0</td>
</tr>
<tr>
<td>Notified</td>
<td>5</td>
<td>145</td>
<td>271</td>
<td>513</td>
<td>5</td>
</tr>
<tr>
<td>Unknown</td>
<td>20</td>
<td>256</td>
<td>559</td>
<td>201</td>
<td>358</td>
</tr>
<tr>
<td>TOTAL</td>
<td>3393</td>
<td>22536</td>
<td>5912</td>
<td>6972</td>
<td>533</td>
</tr>
</tbody>
</table>

Table 53: Resource Consent Non-compliance by Activity Status by Process 2000-2010

Overall, a significant proportion of the resource consents required are processed as non-notified, being an indication that on the facts and circumstances of that application the adverse effects on the environment were judged to be insignificant. This may be because the minor nature of the non-compliances with the City Plan rules, applicants obtaining written approvals, or the non-compliances being internalised within a development. However, these developments are routinely granted and hence the land use judged to be appropriate within their individual context. This draws into question whether there is sufficient benefit derived from these processes to warrant the cost, particularly as compliances costs have escalated significantly. From the data we are not able to clearly understand whether this is an efficiency or effectiveness issue, or both. The data suggests the permitted activity thresholds may be:

1. In a general sense, set too strictly resulting in unnecessary processes (i.e. or less than optimum efficiency).
2. Set too coarsely and need to better reflect different types of development (i.e. or less than optimum efficiency).
3. Not appropriately supported by the related City Plan provisions such as the relevant policies, assessment matters or activity status (i.e. less than optimum effectiveness).
Appendix One: Summary of the Methodology

The methodology below was determined by *Methodology for monitoring the effectiveness and efficiency of the Christchurch City Plan (Section 35(2)(b) of the RMA)* dated 13 April 2010 and adopted by the Christchurch City Council on 20 April 2010, with one significant change. The agreed change is that this evaluation is not to further consider those parts of the City Plan for which the City Council has largely already considered effectiveness and efficiency as part of other processes.

The methodology fulfils the requirement in Stage One of the Supply of Services Agreement for Monitoring the Effectiveness and Efficiency of District Plan Rules (Clause Section 35(2)(b) RMA). Stage One requires the development of a methodology for the evaluation and reporting of the efficiency and effectiveness of policies, rules, or other methods in the Christchurch City Council City Plan 2005 (City Plan) which satisfies section 35(2)(b) of the Resource Management Act 1991 (RMA). Stage Two requires the appropriate evaluation and assessment to be undertaken in accordance with the methodology.

The primary purpose of the evaluation is to shape the future review of the City Plan. In addition, the evaluation will provide a base-line for future City Plan monitoring and be used to inform the future development of the City Plan monitoring programme.

The methodology must:
1. use existing sources of information;
2. ensure all of the sections in Volume Two and Three of the City Plan are considered; and
3. provide for field corroboration of any findings through the use of Pictures.

Section 35(2)(b) of the RMA focuses on how effective and efficient the policies and methods in the City Plan are in achieving (or otherwise) the natural and physical resource objectives set out in that Plan. This evaluation is to be completed at intervals of no more than 5 years (Section 35(2A)), and appropriate action is to be taken when this is shown to be necessary (Section 35(2)). Importantly, the section 35(2)(b) evaluation does not consider what the appropriate objectives of the City Plan are. Further, in light of the effectiveness and efficiency assessment, an overall judgement is not required to be reached as to the appropriateness of the policies and methods.

In order to determine the influence of the City Plan, the evaluation must focus on those things that the City Plan is empowered to deal with, which relates to subdivision, land use, noise, and activities on the surface of water.

Effectiveness is:

> **Effectiveness** - means how successful a provision is in achieving the stated objective. How successful a provision is can be measured in terms of not just whether an objective will be achieved outright; but it may alternatively relate to the extent to which progress will be made even if the objective won't be met in full. The speed at which progress is made may also be a relevant consideration.

Therefore, evaluating effectiveness has two components. Firstly, how successful is the implementation of the policies and methods for the purpose of achieving stated objectives over time. Secondly, the extent to which the objectives are not achieved as a result of the absence of policies and methods.

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320 The ‘narrative’ category
Efficiency is:

**Efficiency** - means where the benefits will outweigh the costs, either immediately or over time. The most efficient policy or method will achieve the stated objective with the greatest benefit and at the least cost (costs and benefits may be quantitative, semi-quantitative and/or qualitative). Efficiency is not to be confused with the terms 'net benefit' or 'net present value' (a measure that implies that all benefits and costs can be converted to a common 'currency' and netted off against one another to generate a single measure).

A summary of the proposed methodology is shown in Figure 44.

**Figure 44: Methodology Summary**

![Methodology Summary Diagram]

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At the outset, the City Plan provisions are broken into manageable groups and then placed into three different evaluation categories:

**Detailed evaluation** - groups which are of strategic importance to the overall outcomes sought by the City Plan and where the City Plan is the primary tool to achieve those outcomes. Typically, these groups affect large geographic parts of the City. Further determining effectiveness and efficiency will require a multifaceted evaluation.

**Simple evaluation** – groups which relate to: matters of strategic importance to the overall outcomes the City Plan, but for which the existing work programmes of the City Council already provide insight into effectiveness and efficiency; or matters which are specialised, without a strong spatial element. As a result, determining effectiveness and efficiency can be achieved by a more simple evaluation.

**Narrative evaluation** – groups for which the evaluation of effectiveness and efficiency is unlikely to reveal any further or new information that will affect the current understanding of the City Plan. This may be because decisions have already been made that review is required, the primary resource management response is the function of another agency, establishing a nexus between the City Plan and the environmental change is unlikely to be possible, or the provisions are yet to operate long enough to enable robust conclusions to be drawn. For these groups no further evaluation is undertaken.

The City Plan groups, and their category, are set out in Table 54:

<table>
<thead>
<tr>
<th>Detailed</th>
<th>Simple</th>
<th>Narrative</th>
</tr>
</thead>
<tbody>
<tr>
<td>Christchurch Airport</td>
<td>Deferred Living</td>
<td>Air and Water</td>
</tr>
<tr>
<td>Urban Growth</td>
<td>Ecological Protection</td>
<td>Central City Commercial</td>
</tr>
<tr>
<td>Coast</td>
<td>Fill/Excavation Grouping</td>
<td>Central City Living</td>
</tr>
<tr>
<td>Education and Hospital Facilities(^{323})</td>
<td>Land Contamination</td>
<td>Energy</td>
</tr>
<tr>
<td>Industrial</td>
<td>Other Facilities</td>
<td>Greenfield Living</td>
</tr>
<tr>
<td>Open Space Recreation</td>
<td>Tangata Whenua and Cultural</td>
<td>Heritage Protection</td>
</tr>
<tr>
<td>Suburban Commercial</td>
<td>Travellers Accommodation</td>
<td>Designations</td>
</tr>
<tr>
<td>Suburban Living</td>
<td>Utilities</td>
<td>Financial contributions</td>
</tr>
<tr>
<td>Rural Hills</td>
<td>Waste</td>
<td>Hazardous substances</td>
</tr>
<tr>
<td>Rural Plains</td>
<td></td>
<td>Natural Hazards</td>
</tr>
</tbody>
</table>

\(^{323}\) As an example of site specific provisions.

Table 54: Evaluation Approach for Different City Plan Matters
Evaluating the effectiveness and efficiency of the Christchurch City Plan

For those groups in which detailed or simple evaluation is to occur, a four step process is to be used:

1. **Determining what is to be evaluated and how** – In this stage, for the purposes of evaluation it will be determined what the policies and methods of the City Plan are to achieve, and then how to evaluate their effectiveness and efficiency (evaluation priorities (indicators)).

2. **Information collection (monitoring)** – In this stage, the queries of existing information sources are developed in consultation with the relevant City Council staff, and the queries undertaken by those staff. In this process, information will be collected for both the effectiveness and efficiency evaluation.

3. **Effectiveness evaluation** – In this stage the effectiveness analysis is undertaken in four steps:
   
a. Firstly a preliminary evaluation is made. This evaluation will be informed by interviews with staff in the City Council experienced in implementing those specific provisions in the City Plan being monitored.
   
b. Secondly, using selective and targeted field work, corroborate the effectiveness findings and gather examples for presentation in the final report.
   
c. Thirdly, complete the effectiveness evaluation by drawing conclusions, including in relation to the:
      
i. performance of the existing policies and methods; and
   
ii. the extent to which the objectives are implemented.
   
d. Fourthly, it is anticipated that this stage may also generate recommendations about future monitoring activities.

4. **Efficiency evaluation** – Only if the effectiveness evaluation concludes that the provisions are of an acceptable level of effectiveness will an efficiency evaluation be undertaken and conclusions drawn. Again, it is anticipated that this stage will generate recommendations about future monitoring activities.

From the above it can be seen that the effectiveness assessment is used as a filter of whether to undertake an efficiency assessment. When the policy and method group is not effectively contributing to the achievement of the objectives in the City Plan, this, in itself, is a sufficient indication that these provisions require amendment as part of the City Plan review.

The focus of the efficiency evaluation is on unanticipated, unnecessary, and administrative and compliance costs which may have changed over time.

There is a wide variety of information about the City available. However, it is fundamental that the information used must enable conclusions to be drawn about the influence of the City Plan on the environment. This causes the monitoring to be focused on information that relates to the City Council’s functions under the RMA.
The evaluation of effectiveness and efficiency of the City Plan will be reported within a single written (including an electronic version) report. The report will be prepared in a manner suitable for two audiences. The first audience is the City Council’s internal staff with a sophisticated understanding of the City Plan and the RMA. The second audience is the politicians of the City Council. To support this report, a companion A3 work book will be prepared recording the key visual images from the field corroboration for each City Plan group.

Given the resource requirement for the detailed and simple evaluation procedures, the suburban living group is to be used as a pilot, and the methodology is (if necessary) to be reviewed in light of this.
Evaluating the effectiveness and efficiency of the Christchurch City Plan

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Appendix Two: Description of Information Sources Used

There are a number of available information sources to assist in understanding the effectiveness and efficiency of the City Plan. The primary sources used in this report are described in this appendix.

Christchurch City Council Published Monitoring Data

This information is used in this report as part of understanding the effectiveness of the City Plan, particularly for city-wide issues or key subject area of Urban Growth.

The City Council runs various monitoring programmes, including state of the environment, City Plan monitoring, quality of life, social trends, residents survey’s, and other one off evaluations. For the purpose of this evaluation, much of this information is either too coarse to enable the effectiveness and efficiency of the City Plan to be evaluated, falls outside the evaluation period of 2000 to 2010, or relates to matters that the city Plan cannot directly influence. The two sources of information used in this report are:

1. *State of Environment monitoring programme*: This programme in undertaken in response to Section 35(2) of the RMA. It examines changes in the quality of the environment arising from either natural or human causes using the pressure, state and response typology. The data was sourced in the April to September 2010 period from the City Council’s website[^324]. The data on the website is updated on a rolling basis.

2. *City Plan monitoring programme*. This programme in undertaken in response to Section 35(2) of the RMA. It focuses on the effectiveness of the City Plan as a means of achieving the objectives and policies which have been set out in the Plan. Monitoring is undertaken by identifying selected key anticipated environmental results within each overall objective identified in Volume 2 of the City Plan and measuring whether the outcomes have been met, through the use of key indicators. The data was sourced in the April to September 2010 period from the City Council’s website[^325]. The data on the website is updated on a rolling basis. Within this programme is found the residential and industrial vacant land registers, and trend information using a variety of Statistic New Zealand and Christchurch City council collected data.

City Council Rating Data-Base

The City Council rating data-base is primarily used in this report to understand current land use in different parts of the City. The information from this data-base was provided by the Christchurch City Council specifically for this project.

The City Council rating data-base is managed by the City Council for rating purposes. For rating purposes it records a variety of information about each property in the City. It is understood that this data-base is reviewed and updated on a 3-yearly cycle coinciding with the review of the valuation of all the properties in the City, which was last completed in August 2007. Further it is consistently updated as property information changes. In June each year the City Council ‘freezes’ a version of the data-base, at the time that rates are struck. For the purposes of this work the June 2010 ‘frozen’ data-base was used.

[^324]: http://www.ccc.govt.nz/thecouncil/policiesreportsstrategies/reports/environmentmonitoring
[^325]: http://www.ccc.govt.nz/thecouncil/policiesreportsstrategies/districtplanning/cityplan/cityplanmonitoring
The rating data-base records the ‘highest and best’ use of each property as part of the property valuation exercise. It does so using approximately 90 generic land use categories. The ‘highest and best’ use primarily reflects existing land use.

Within this report, this information is used to develop an understanding of the land use profile within areas of the City. While, the information will not provide a totally accurate picture of actual land use occurring, it is a practical means of understanding the actual general land use profiles for the purposes of comparison with the types of land uses anticipated by the City Plan. It is also the only comprehensive source of information.

The weakness of this data-base is that currently it provides no indication of when anomalous land uses occurred – that is, was it in the period of the evaluation period of the City Plan. Therefore, this data-base could become more useful in future effectiveness and efficiency monitoring if a simply system can be development to compare land use change between different ‘frozen’ versions of the data-base.

**Building Consent Data-Base**

The building consent data-base is used in this report for two purposes. The first is to understand land use change and investment patterns between 2000 and 2010. The second is to provide a coarse comparison with the resource consent data-base to inform the efficiency assessment of the City Plan. The information from this data-base was provided by the Christchurch City Council specifically for this project.

The City Council’s building consent data-base records all Project Information Memorandum and Building Consent applications. In simple terms it provides simple description of the application, and records the intended use of the building, its nature, project value and location (including zone). From this data-base it is relatively easy to understand whether the application is for:

1. A new residential use, being a dwelling or apartment, and how many of these are being consented
2. Demolition
3. Improvements to an existing dwelling or apartment
4. For other than a dwelling and apartment
5. The estimated value of the work for the purposes of calculating the building consent application fees.

Currently, there is no simple way of querying:

1. The type of improvements for a dwelling or apartment
2. The net change on the land use on the site
3. The different types of ‘other than dwelling and apartments’, except by relying on the free entered descriptions.

For the purpose of evaluating the City Plan, simple improvements to the data-base can be made. These primarily relate to finer ‘intended use’ coding. The land use codes from the rating data-base may provide a starting point for this.
Resource Consent Data-Base

The resource consent data-base is used in this report primarily for three purposes. The first is to understand the land use change which has been consented, the second to evaluate the effectiveness of different rules by considering the non-compliance which result in the need for consent and the final outcome, and the third to identify possible rules that have resulted in changes in efficiency by considering the way in which consents are processed and the eventual outcome. The information from this data-base was provided by the Christchurch City Council specifically for this project.

The resource consent data-base records a variety of information. For the purpose of this report, the useful fields relate to location, zone, description, type of application, non-compliance, activity status, process and outcome. From this information it is relatively easy to understand the individual land use change consented (or not) on each site, and the process used to arrive at this decision.

However, there are a number of weaknesses to this data-base. These include:

1. The coding does not allow for an easy differentiation between subdivision and land use applications. At present the subdivision applications cloud the use of the land use data to understand both effectiveness and efficiency.

2. There is no unified coding of the land use change that allows the data to be easily aggregated. Again the rating data-base may provide a starting point for this.

3. There is uneven entry of data, decreasing the reliability of the information obtained from the data-base.

4. The differentiation between different types of applications is blurred, particularly in relation to outline plan resulting from designations.

5. There appears to be no uniform way of entering descriptions, rendering this field of reduced value for analysing aggregated data.

6. There is no entry as to whether the resource consent is implemented, reducing the confidence in using this data-base to understand actual land use change.

7. There is not cost information entered in relation to additional actual and reasonable costs, reducing the potential of this data-base to understand changes in efficiency.

8. Resource consent conditions are not entered into this data-base, limiting the ability to understand effectiveness from this data-base and again reducing the potential to understand changes in efficiency.

9. Monitoring and enforcement information is not linked to this data-base limiting the ability to understand the actual effectiveness of conditions of consent.

Interviews with Staff

Interviews with staff are used in this report for two purposes. The first is to derive information from their experience in administering the City Plan, often which is not apparent from the available data. The second is to provide a check on the information obtained from other data-sets.

The interviews were typically, but not always, conducted with both Plan Administration and Plan Policy staff. In order to facilitate these interviews, prompt questions were circulated to the staff prior to the interviews occurring.
The interviews proved to be a valuable source of detailed information about the strengths and weaknesses of the City Plan provisions, and provided an insight into reasons why the effectiveness and efficiency of these provisions may be less than optimal.

The weakness of this approach is that it relies on: firstly the preparation of the staff interviewed, and secondly the accuracy of their observations and recollections.

**Perception Surveys**

Perceptions surveys are used in this report to understand the community’s perception of the natural and physical environment, particularly in relation to character and amenity values.

The City Council run a number of perception surveys. These include the annual residents’ survey, and discrete project related surveys.

The annual residents’ survey is about service delivery. While this does relate to matters which are subject to the City Plan, the questions are related to service delivery not natural and physical resource outcomes, and are too generic to enable perceptions of actual land use change influenced by the City Plan to be understood.

The project related surveys are more useful when these relate to land use management. Two of these surveys were used in this report\(^{327}\). These surveys were used to understand how people viewed land use change relating to Greenfield and infill development. However, the weakness of these surveys for this report is that they tend to be a ‘slice-in-time’.

\(^{326}\) For example, transport, open space, heritage, City Plan administration.

\(^{327}\) Christchurch City Council’s 2001 *Townhouse Survey Report*; Lincoln University 2004 *The effects on Infill Housing on Neighbours in Christchurch* prepared for Christchurch City Council; and Christchurch City Council’s 2004 *New Subdivision Residents Survey*. 