



Office of Hon Gerry Brownlee

MP for Ilam

Leader of the House
Minister of Transport

Minister for Canterbury Earthquake Recovery
Minister Responsible for the Earthquake Commission

Her Worship the Mayor Lianne Dalziel
Christchurch City Council
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CHRISTCHURCH

Dear Mayor Dalziel

Ministerial Comments on Draft Proposals for the Christchurch Replacement District Plan

The Ministers for Canterbury Earthquake Recovery and for the Environment received the draft proposals for the Christchurch replacement district plan on 11 July 2014.

The 11 draft proposals and supporting information received includes:

- Proposal 1 - Introduction
- Proposal 2 - Definitions
- Proposal 3 - Strategic Directions
- Proposal 5 - Natural Hazards
- Proposal 7 - Transport
- Proposal 8 - Subdivision and Development
- Proposal 10 - Designations and Heritage Orders
- Proposal 12 - Hazardous Substances and Contaminated Land
- Proposal 14 - Residential
- Proposal 15 - Commercial
- Proposal 16 - Industrial

To assist the Council to make further improvements to the draft proposals and to better enable the city and district to recover from the earthquakes, we have provided our detailed comments, including recommendations and reasons, in the attached document. These comments are made pursuant to Schedule 1, Clause 3(1) of the Canterbury Earthquake (Christchurch Replacement District Plan) Order 2014 (the Order).

We recognise the district has suffered extensively as a result of the earthquakes and the existing district plans are no longer fit for purpose. Therefore through the Order we have set our expectations for the significant change we consider needs to be reflected in the replacement district plan (Statement of Expectations contained in Schedule 4 of the Order) to ensure it is more enabling and recovery focussed.

We have assessed the draft proposals against the Statement of Expectations, and whilst we recognise the significant effort invested by the Council to date and the improvements made compared to the existing district plans, we consider a number of amendments are required to align the draft proposals with the Statement of Expectations.

In summary, the issues which still need to be addressed include, but are not limited to, the following:

Strategic outcomes

The draft proposals focus on retaining the status quo and lack a clear strategic direction for the future of the district that reflects the significant changes that have occurred as a result of the earthquakes. There is no clear overarching direction for the district as a whole, including how it links with the Central City and the wider regulatory planning system and what the needs of businesses and households are going forward. How the phases of recovery are to be prioritised and managed also does not come through clearly in the proposals.

Balancing flexibility and certainty

Many of the development controls in the draft proposals have been constructed to maintain the approach of the existing district plan rather than providing for innovation, choice and growth. Whilst prescriptiveness can achieve certainty, it is considered the balance needs to be redressed to achieve greater flexibility for those seeking to develop under the plan, and to reduce the consenting and notification requirements. For example, the use of quality standards which go beyond Building Code requirements to decide whether a house needs a resource consent such as the HomeStar accreditation system, need to be removed due to the potential transaction costs and impracticality.

Residential land supply and encouraging intensification

The draft proposals do not enable sufficient residential intensification, particularly medium-density residential development, and are likely to result in insufficient residential development capacity within existing urban areas. In addition, the residential proposal

contains an excessive number of rules and assessment matters, which are considered overly prescriptive, limits design options and may have an adverse effect on the financial feasibility of providing necessary housing choice.

Temporary activities

The draft proposals go some way toward providing for temporary activities, however in general there is a lack of specific positive enablement for temporary recovery activities, including continued provision for the temporary relocation of businesses while buildings undergo repair or rebuilding. Greater clarity and certainty of the path to recovery, including timeframes for any transitional arrangements, should be provided.

Business development capacity, recovery and growth

While the proposals ensure there is a theoretical supply of land for commercial and industrial activity, further analysis is needed to ensure this translates into development and prosperity. Compared to the existing plan, the proposals appear to reduce the reliance on resource consents, but do not go far enough. The intended outcomes could also be made clearer based on an analysis of what businesses will need to recover and grow in Christchurch.

Natural hazards

The proposal for natural hazards is relatively easy to follow compared to the other draft proposals, however there are outstanding concerns about the terminology and definitions used and how this proposal will integrate with the Christchurch Central Recovery Plan. A number of amendments are necessary to provide greater clarity and to improve the supporting section 32 report.

Clarity and ease of use

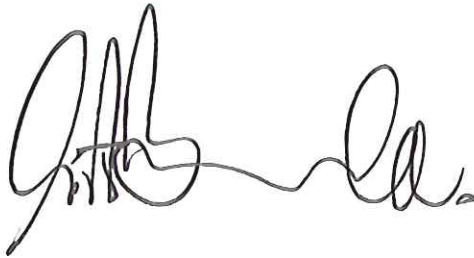
The simpler structure of the draft proposals improves usability in comparison with the existing district plans, however some parts are still difficult to navigate and unclear due to their complexity and subjectivity. For example, there are long lists of assessment matters in most of the draft proposals, and some are overly broad and subjective, making them difficult to interpret. There is significant opportunity to streamline and remove overlap between provisions.

Overall, the draft proposals need to provide a clearer articulation of the anticipated outcomes for the Christchurch district through the rebuild and recovery, and into the future. We consider the draft proposals are too embedded in the existing district plans and do not make the step change needed to support recovery.

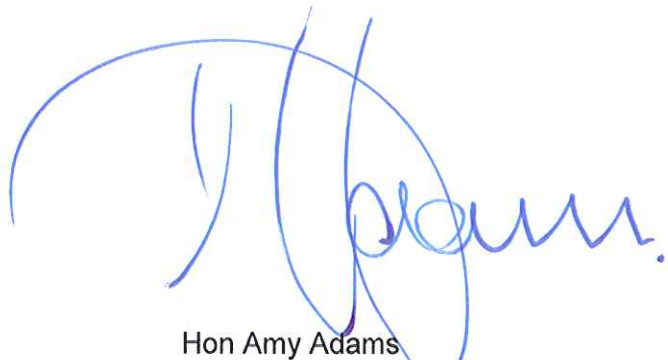
Having agreed to a streamlined process to enable a more timely response to the recovery needs of Christchurch District, we note the Council must have particular regard to the comments we now provide.

We note that on 18 and 24 July the Council provided further information, additions and corrections. However it has not been possible for this additional material to be critically analysed by the 1 August deadline.

Yours sincerely



Hon Gerry Brownlee
**Minister for Canterbury Earthquake
Recovery**



Hon Amy Adams
Minister for the Environment

Comments by Minister for Canterbury Earthquake Recovery and Minister for the Environment on draft proposals for the Christchurch Replacement District Plan

1. To assist the Council to better understand our comments, reasons and recommendations further details are provided below setting out the following –
 - Background to the Order;
 - Government’s objectives in establishing the Order;
 - Timeframes for the replacement District Plan;
 - Status of the comments;
 - Relationship to the Recovery Strategy & Recovery Plans;
 - Comments, reasons and recommendations; and,
 - Statement of Expectations in Schedule 4 of the Order.

Background

2. The recovery and rebuild of Christchurch following the Canterbury earthquakes is one of the Government’s foremost priorities. The rebuild effort will be significant, costing an estimated \$40 billion, including a \$15 billion commitment from the Government. An estimated \$4 billion of infrastructure repair is needed, with various levels of repair or redevelopment of more than 130,000 residential properties. In addition to buildings and infrastructure, the government has committed resources to a wide range of initiatives to ensure the full social, economic, cultural and environmental recovery of greater Christchurch.
3. Currently, Christchurch has two district plans – the Christchurch City Plan and the Banks Peninsula District Plan. Both plans were developed in the 1990s and have been amended incrementally since then. Neither of these plans was designed to cope with the amount of repair and rebuild that will be necessary to recover from the earthquakes. Christchurch needs an up-to-date and effective district plan that will provide certainty during the rebuild and will support the growth of Christchurch beyond the recovery and rebuild.
4. The Government agreed to a request from Christchurch City Council for an expedited process to produce a replacement district plan by April 2016, and developed the Canterbury Earthquake (Christchurch Replacement District Plan) Order 2014, subsequently

referred to as the Order. The process has been designed to encourage constructive discussions in the early stages of the review, and comes with specific expectations of the Minister for the Environment and the Minister for Canterbury Earthquake Recovery. These expectations are set out in the Statement of Expectations in Schedule 4 of the Order (appended to this document).

Government Objectives

5. The Government's main objectives in establishing the Order are to:
 - a. provide a streamlined process to put in place a replacement district plan before April 2016 that will remove unnecessary regulatory impediments and facilitate recovery;
 - b. provide a clear regulatory environment to help ensure that the rebuild of Christchurch can progress as quickly as possible; and,
 - c. ensure that relevant actions and requirements of the Land Use Recovery Plan, the Christchurch Central Recovery Plan and the Recovery Strategy for Greater Christchurch are implemented as quickly as possible.

Timeframes for the replacement District Plan

6. Decisions on the replacement District Plan will be completed in stages. The priority matters will be set out in the Terms of Reference for the hearings panel. The hearings panel will make decisions on matters of priority by early 2015. Other decisions on all other matters are due by March 2016.
7. Our expectation is that by April 2016, there will be a comprehensive replacement district plan in place that will enable recovery in the immediate term and ensure the long term resilience, sustainability and prosperity of the district.

Status of these comments

8. Under clause 3(1) of Schedule 1 of the Order, the Minister for Canterbury Earthquake Recovery and the Minister for the Environment ("the Ministers") have the opportunity to provide comments with reasons on the draft proposals. Clause 3(2) of Schedule 1 relates to the Statement of Expectations and states:

"If the Ministers consider that the Council has not had particular regard to the statement of expectations, the Ministers may make comments under subclause (1) on how they consider the statement of expectations should be addressed in the proposals".

9. In accordance with clause 3(3) of Schedule 1 of the Order, the Council must have particular regard to any comments provided by the Ministers, and may modify the draft proposals in response to the Ministers' comments prior to publicly notifying the draft proposals.

10. Our comments on the draft proposals and their reasons are set out in this document. The comments are not intended to be a comprehensive or line by line commentary on the provisions of the draft proposals, but a response, with reasons, as to how the statement of expectations have been addressed.
11. These comments are provided on the basis that they are not to be taken as representative of the totality of the issues that we may wish to include in any submission made following notification of the proposals. We reserve their ability to lodge submissions on the public notified draft proposals in due course. Such submissions may raise new issues or concerns not identified in these comments.
12. Clause 3(3)(b) in Schedule 1 of the Order states that the Council may modify the draft proposal:
 - i. in response to the Ministers' comments:
 - ii. to correct minor errors.
13. We encourage the Council to correct relevant minor errors, and in response to our comments provided below. We understand the Council has already identified and provided officials with a list of amendments to the proposals which the Council would like to include when notifying the draft proposals. As we have not had the opportunity to consider the list of amendments in detail, we do not necessarily endorse or agree with all of those amendments, and along with the public and other parties we will need to consider those in further detail post notification. However, we encourage the Council to make those amendments it considers appropriate to ensure that clear and correct provisions are included in the draft proposals, and in response to our comments.

Other instruments

14. In providing these comments, we have been cognisant of the statutory requirement that the draft proposals cannot be inconsistent with the Land Use Recovery Plan or the Christchurch Central Recovery Plan. Clause 2(1)(a) of Schedule 1 of the Order provides that the Council must prepare a draft proposal that complies with section 23 of the Canterbury Earthquake Recovery Act 2011, which in turn provides that any person exercising functions or powers under the RMA "*must not make a decision or recommendation that is inconsistent with the Recovery Plan*".
15. The proposals must also give effect to the Canterbury Regional Policy Statement 2013.

Comments, reasons and recommendations

Strategic outcomes

16. Overall, the chapter-by-chapter approach of replacing the existing district plans has resulted in the lack of a future-focussed narrative to bind the objectives, policies and rules into a coherent whole. Objectives and policies within the rule-based draft proposals do not always provide clear direction for interpretation of those rules. The draft proposals need to convey a cohesive vision and clear outcomes for the district as a whole, and it is not always readily apparent what the expected outcomes are in relation to the objectives and policies as drafted. This is considered necessary to meld the existing direction provided by the Land Use Recovery Plan (LURP), the Christchurch Central Recovery Plan and the Regional Policy Statement (RPS) with the Council's own vision for recovery and the intended outcomes the council has agreed with the community.
17. The recovery from the earthquakes of 2010 and 2011 created some very specific needs for immediate rebuild priorities (e.g. repairs to building foundations damaged in the earthquake), as well as longer term recovery priorities (e.g. recovery and repair of strategic infrastructure). While it is imperative that the review of the district plan responds to these needs, the draft proposals are likely to be in place for at least the next ten years. The draft proposals need to put in place strong foundations for the sustainability and prosperity of the Christchurch district.
18. The vision statement, if retained, needs to reference earthquake recovery and more clearly respond to the immediate and longer term needs. The strategic directions draft proposal needs to provide more Christchurch specific provisions that respond to urgent priorities and elaborate on Christchurch specific outcomes anticipated. Neither the strategic outcomes nor the strategic objectives and policies clearly articulate how the Council intends to manage the transition from the more immediate rebuild priorities, through the on-going recovery process and beyond.
19. The draft proposals do not give sufficient priority to those matters requiring immediate action. Some topics are missing from this stage of producing a replacement district plan and we strongly encourage the Council to continue to work with officials and the community to progress those matters relating to the central city (covered by the Christchurch Central Recovery Plan), temporary activities, flooding, mass movement and other urgent recovery matters. We make specific comment on the priority and timing of some of these matters below.
20. There should be a stronger link between land use and transport in the draft proposals and there is a need for clearer referencing between proposals. It is not clear from the draft

proposals how the package of land-use and transport controls will work to support strategic transport networks (including freight networks). There is a lack of specificity to respond to the changed circumstances post-earthquake, particularly when considering the transport proposals, and those parts of the transport network that are under pressure.

21. Further improvements to the transport proposal is needed to support and reinforce the strategic transport networks (including freight), and to ensure the agreements in the Land Use Recovery Plan, Greater Christchurch Transport Statement and the councils Christchurch Transport Strategic Plan are translated into suitable provisions to provide clearer objectives and policies to inform decision making and help realise intended outcomes.
22. The policy related to the road classification system is not well supported through other policies or methods, especially with regard to high trip generators, promotion of public transport and active transport, vehicle access and the like. For example, access to a higher order classification (i.e. an arterial road) should be discouraged where there is alternative access. There needs to be a clearer reference to the strategic context, and the rules need to support the objectives and policies to avoid ad-hoc site by site evaluation. The arterial and major arterial roads should be illustrated on maps to help manage and maintain an efficient transport network, and further clarification is required to reference how the hierarchy will be managed, particularly around place based and arterial network interactions and other earthquake recovery priorities.
23. Establishment or re-establishment of community facilities may be unduly restricted by development controls and standards, particularly since all non-residential activities are required to have 'minimal' effect on residential amenity (Policy 14.1.7.1) and community facilities in residential zones are provided for to supply 'only local' community needs (Policy 14.1.7.2)
24. The Subdivision, Development and Earthworks proposal links recovery to intensification areas, greenfield land and LURP intensification measures (Policy 8.1.2.9) but does not recognise wider recovery needs, including those associated with integration of land use and infrastructure (such as the possible need to stage development to align with infrastructure repair and upgrading).
25. We consider that the draft proposals are too embedded in the existing district plans and a business as usual approach, and do not effectively demonstrate that the Council has had particular regard to the Statement of Expectations, including in particular expectations (a) and (b).

Recommendation (1): The proposals should provide clearer direction of what needs to occur to facilitate a vibrant and prosperous district in general and in particular for Christchurch as the south island's main city.

Recommendation (2): The proposals need to provide bespoke policies for recovery and rebuilding within the replacement District Plan.

Recommendation (3): Further work is required to ensure the proposals are more integrated and work together to produce the desired outcomes, and provide clear guidance for those using the plan (within objectives, policies and rules), particularly for consenting. Using scenarios of developments to test the usability and requirements of the proposals will assist in making those improvements.

Recommendation (4): Regardless of format adopted ensure all policies relating to recovery and rebuilding are moved to the front of each Proposal recognising their immediate importance. The Strategic Direction within the draft proposals needs to reflect the timeliness and importance of this rebuilding and recovery for the district.

Recommendation (5): The proposals need to more clearly translate the greater Christchurch Transport Statement and the Christchurch Transport Strategic Plan in to the objectives, policies and rules to provide clearer direction for decision making, particularly to respond to the changed conditions post-earthquake, and particularly to support the freight network.

Balancing flexibility and certainty

26. The draft proposals need to balance flexibility and certainty for businesses and residents of Christchurch. The proposals currently do not strike the right balance, and risk imposing unnecessary transaction costs and constraining choice and innovation. Because of the complexity of some of the development controls, particularly in the residential, commercial and industrial Proposals, the draft proposals do not adequately deliver on the directive to reduce consenting and notification requirements to provide clear and concise language.
27. The need to strike the right balance between flexibility and certainty in the face of the challenge of rebuild and recovery is paramount. The widespread damage to land and property during the earthquakes has created demand for a significant amount of rebuilding and redevelopment.
28. The Land Use Recovery Plan (LURP) directed the Council to review the district plan to support rebuilding activities by 'reducing consenting and notification requirements', and 'addressing the efficiency and effectiveness of urban design provisions' (Action 45).

29. The draft proposals as provided to us do not contain a notable, or even moderate, reduction in the number and prescriptiveness of development controls and design standards. The review of the existing controls appears to have focused on their usefulness in the context of 'status quo' development rather than looking at what might be appropriate to meet changing needs in the future. As a result, many of them (particularly when considered in combination with each other) are geared towards maintaining the existing provisions of the plan rather than providing for innovation and choice to support recovery. This may have adverse impacts on the recovery, for example, the controls may inadvertently affect the economic feasibility of development and limit the ability provide to a full range of housing types to meet changing needs.
30. While we commend the Council's obvious commitment to achieving good urban design outcomes, the approach taken to achieve its objectives is likely to impose additional cost and constraints on residents and businesses, and it is unclear whether they will be effective in achieving the desired outcomes. Taken together, the development controls in the draft proposals are overly complex and prescriptive; there is a likelihood that they will limit choice and innovation for people seeking to rebuild or redevelop in Christchurch. Many of the draft rules are likely to be an inefficient way of achieving the desired outcome.
31. The narrow 'envelope' of permitted activities will constrain innovation. It may also mean a greater number of developments will require resource consent. For those that do require resource consent, the inclusion of a large number of relatively subjective standards in the 'matters for discretion' will reduce any gains from providing greater certainty through prescriptive controls.
32. It is evident when considering the provisions that apply in the Commercial Core and the Commercial Fringe Zones that there has been an increase in the number, extent and prescriptiveness of the development controls applying to the zones when compared to the previous District Plan Business 1 and 2 zones. Examples of this include:
 - a. Permitted activity rules Commercial Core 15.2.2.1 - P2(a) controlling gross floor area, location of activities on corner sites, and size of frontages
 - b. Permitted activity rules Commercial Core 15.2.2.1 - P2(b) controlling maximum tenancy size of gross leasable floor areas , within Neighbourhood Centres
 - c. Built form standard Commercial Core 15.2.3.3 (A)- controlling minimum floor to ceiling heights
 - d. Built form standard Commercial Core 15.2.3.3 (D) and (E) - provision of visually transparent glazing on the ground and higher floors

- e. Built form standard Commercial Core 15.2.3.7 Waste management areas
33. To clarify, we do not consider that these controls are the only ones worthy of comment, or even the most significant. Rather, these are simply a sample of where the right balance has not been struck between flexibility and prescription. Such inflexibility may have wider consequences than impeding the recovery effort. If parties seeking to rebuild or reinvest insurance settlements experience difficulty dealing with a number of prescriptive design standards, they may discourage development out of Christchurch altogether, and increase the risk of capital flight. Even the perception of difficulty dealing with the draft proposals or obtaining resource consent may have an adverse impact on the intentions of investors.
34. In relation to the draft Residential and Subdivision proposals the following specific examples are provided:
- a. Rule 14.2.3.8 (Minimum setback and distance to ground level for windows and balconies) – a complex standard reflecting overly conservative approach in relation to privacy. It is confusing in combination with other setback requirements - Rule 14.2.3.7 requires building setback from internal boundary of 1.8 m, while Rule 14.2.3.8 requires 3 m setback for windows on ground floor, and 4 m setback for windows and balconies on upper floors, if building is at an angle of less than 90° to the boundary. Rule 14.3.3.8 re building setbacks in residential medium density zone also has multiple setback requirements for different circumstances
 - b. Rule 14.2.3.9 and 14.2.3.10 landscaping requirements
 - i. where the access to the garage is located adjacent to a side boundary, “a planting strip of 0.6m width with a height at time of planting, with species capable of reaching 1.5 metres, of 1.2 metres up to the line of the existing house”
 - ii. a 2m wide landscape strip along the setback from the road frontage
 - c. Rule 14.2.3.11 Lifemark and Homestar internal design standards do not give adequate consideration to economic feasibility, transaction costs and uncertainties created by the consenting process, or how these requirements will be enforced by the Council.
 - d. Rule 14.3.3.1 detailed requirements for tree and landscape plantings apply to all activities in the Residential Medium Density Zone, including development of a single residential unit on a 300 m² site as well as multi-unit developments

- e. Rule 14.3.3.12 Building overhangs in Residential Medium Density zone: “No internal floor area located above ground floor level shall project more than 800mm horizontally beyond the gross floor area at ground level.”
 - f. Rule 14.3.3.13 “Where six or more residential units are proposed as part of a multiunit social housing complex or a multiunit residential complex, there shall be a mix of at least two unit size types ranging across one, two, three or more bedrooms. No unit size type shall account for more than two thirds of the overall number of units on a site.”
35. We would also like to reinforce the need for the Council to continue to improve its resource consent processes. The Council has made good progress on implementing the recommendations made in the reviews of its resource and building consent functions, but we encourage the Council to continue efforts to implement the outstanding recommendations. Without improvements to the process, the replacement proposals will not be enough to enable a timely recovery, and send the right signals to investors and the community.
36. The proposals and supporting information do not effectively demonstrate that the Council has had particular regard to the Statement of Expectations, including in particular expectations (a) (i) (ii) & (iii).

Recommendation (6): Review the development controls in the draft proposals, with the intention to reduce prescriptiveness and further clarify the subjective assessment matters and objectives, policies and rules to increase flexibility for those seeking to develop under the proposals, and to reduce consenting and notification requirements.

Suitability of controls

37. We understand and applaud the Council’s intent to ‘future-proof’ buildings and improve their quality. The government supports the intent to provide good quality and accessible homes. However, we do not consider that the inclusion of external quality ratings in the proposals, such as HomeStar or LifeMark, is necessary, effective or appropriate for achieving those outcomes, and is inconsistent with the statement of expectations.
38. While the draft proposals do not require mandatory compliance with these standards, there is an implicit endorsement of them through the inclusion of selected standards into the development controls, particularly to be a permitted activity. The requirement for resource consents for any departure from the standards will result in delays, frustration and costs, given the fees and costs associated with resource consents. It is unclear how the provisions would be monitored and how the enforcement of these requirements will be

undertaken. This will also put a burden on the council's limited resources to do this. Under the draft proposals, developments which are validated under those external quality ratings are exempt from compliance with the rules, while all other developments will either need to comply with a number of standards selected from those quality rating systems or apply for resource consent.

39. The HomeStar requirements will force developers to build to a level of quality that is in many cases beyond the building code, and may be beyond the level that may make economic sense in the short term, particularly when considering the regulatory burden and transaction costs in negotiating the provisions in the draft proposals. This may reduce the affordability of housing in the short term, at a time when there is already severe pressure on the housing market in Christchurch. The proposals, and supporting information, could include more consideration of the economic feasibility of these requirements, given the different circumstances that will be faced by developers in different situations. The current approach imposes a significant cost on those that need to depart from the permitted standards, as they will need to apply for resource consent with associated fees and other costs and delays, to prove that they should not need to comply with the council's standards.
40. The inclusion of selected standards from the LifeMark rating system is intended to increase how adaptable buildings are to future demographic changes. However, these standards are likely to have limited effectiveness due to the difficulty of monitoring on-going compliance (although we note that some of the LifeMark requirements have been excluded on this basis). In effect, they provide additional, highly prescriptive standards that must be adhered to, which will increase the cost of building in the short term and have detrimental impacts on affordability. The alternative is costly consenting processes.
41. The Government's current position is that provided that consumers have the right information to make decisions around home energy efficiency, sustainability and life-stage inclusive design, and their decisions do not have significant negative externalities, the decision to comply with such ratings should not be a regulatory requirement. There are a range of other mechanisms and non-regulatory tools available to help achieve the goal of providing warm, dry and accessible housing, such as incentives, education and promotion, catalyst projects and advice. These other mechanisms should be fully explored and explained the section 32 report prior to including a regulatory requirement in the draft proposals.
42. The suitability of some of the controls included in the draft proposals need further improvement to more effectively respond to the post-earthquake environment, with particular regard to the Statement of Expectations, including in particular expectations (a)(i) and (ii).

Recommendation (7): Review the suitability of external quality standards in the draft proposals, with further consideration of the potential costs and practicalities of the provisions related to 'homestar' and 'lifemark' and the like.

Recommendation (8): Provide further clarity, improve the quality and reduce the quantity of assessment matters and development standards to focus on those effects that need to be managed through the replacement district plan.

Recommendation (9): Reduce the prescriptive nature of urban design provisions, and clarify those matters that are subjective to be clearer about the intended outcome, and the effect that is required to be managed.

Land supply and encouraging intensification

43. A relatively high proportion of the housing lost was more affordable housing, including social housing units and rental accommodation.
44. The need for new housing in Christchurch is significant, and the replacement district plan has a very important role to play in enabling new development. Therefore, it is critical that the proposals send the right signals to those seeking to repair or rebuild their homes, or promote new developments. In particular, since the earthquakes, a significant proportion of new housing developed has been new, stand-alone homes, especially in greenfield subdivisions. A better supply of smaller, more affordable homes is needed to offer greater housing choice and meet changing housing needs. Action 2 of the LURP directed the Council to focus on encouraging housing choice and intensification through the proposals.

Delivering sufficient development capacity

45. The draft proposals contain clear objectives that set out the Council's intention to focus intensification in the Central City and around Key Activity Centres. We generally support these objectives. However, the detailed rules and development controls do not give effect to these objectives, and consequently we do not consider that the proposals, as provided to us, address expectations (d) and (e).
46. We consider that the proposals need to be much more enabling of medium-density residential development. The analysis that supports the proposals focuses on the capacity of land in and around Key Activity Centres to absorb medium-density residential development. While we support the general approach, and agree that medium-density development does need to be well-serviced, the constraints applied to the analysis are overly conservative. For example, the methodology has excluded all land that is not within a 10 minute walking distance of a Key Activity Centre, regardless of other transport modes

available. Similarly, it does not take account of likely market intentions or constraints such as the need to amalgamate sites.

47. Rules for existing residential areas only provide for a small amount of intensification (not significantly more than in the current Plan) without resource consent. Multiple units are permitted without resource consent only as follows:
 - a. Immediate LURP measure allowing for two units on a site (only for sites vacant before earthquakes or where existing single unit needs to be demolished because of earthquake damage) and for splitting a single residential unit into two
 - b. In the Residential Suburban Zone (Density Transition overlay area only, except for social housing units), up to three units on a 330 m² site, provided the development is single-storey
 - c. In the Residential Medium Density Zone, up to two units on a 300 m² site
48. A key determinant of development potential is the capacity for improving land, profit margins, available finance and range of complex market driven factors. Many of the areas identified for intensification are unlikely to be redeveloped in the near future given the age of building stock and ownership arrangements, even with provisions for higher density. The proposals need a more robust and sophisticated analysis to identify areas that are ripe for redevelopment, looking at factors such as capital values and the age of building stock, land quality, constraints, amenity and other factors.
49. It is not clear that sufficient land has been zoned for medium density residential development. The additional area zoned is approximately 150 hectares; the supporting analysis suggests that this will be sufficient to meet increased density targets in the Regional Policy Statement. However, this analysis is based on 'theoretical maximum' development rather than realistic expectations of what proportion of this will be actually taken up, which is likely to be over-optimistic, particularly in the short-medium term.
50. The increase in development capacity is limited by the provision for multi-unit developments in existing residential areas (i.e. outside of Key Activity Centres where medium density development is specifically planned for). Aside from the specific interventions relating to the Community Housing Redevelopment Mechanism (CHRM) and the Enhanced Development Mechanism (EDM), only a small amount of intensification is provided for as a permitted activity (not much more than the current plan enables):
 - a. In the Residential Suburban Zone (Density Transition overlay area only), up to three units on a 330 m² site, provided that the development is single-storey

- b. In the Residential Medium Density Zone, up to two units on a 300 m² site
51. In summary, it appears likely that the proposals will fall short in delivering the level of capacity that will be needed in Christchurch and to support the vision from the Christchurch Central Recovery Plan for central Christchurch to become the thriving heart of an international city. If targets for greater intensification are not met, this will increase pressure on greenfield areas to act as a 'safety valve' for a tight housing market. This may ultimately lead to the earlier release of future greenfield development land leading to a range of issues that the Land Use Recovery Plan and Regional Policy Statement seek to address.

Comprehensive development

52. The LURP also directs the Council to 'include objectives, policies and rules in district plans for comprehensive development across multiple or amalgamated sites in appropriate locations'. The only provisions to address this are the LURP mechanisms, the EDM and the CHRM, which will cease to have effect in 2018, and rules providing for comprehensive subdivision/land use consents in New Neighbourhood Zones. Outside of these, it is not apparent how this has been translated in to the proposals.
53. The supporting material identifies that some additional land has been flagged for 'future investigation' but there is no indication of the timeframes for how this will be considered or planned for future release. In addition, there is no overt recognition of the need to co-ordinate timing of subdivision and development with timing of infrastructure repair or improvement.
54. The extent to which the draft proposals enable the additional dwellings and residential intensification that will be required in Christchurch, as set out in expectation (d) and detailed in the Land Use Recovery Plan need further improvement. We consider that the draft proposals do not effectively demonstrate that the Council has had particular regard to the Statement of Expectations, including in particular expectations (c), (d) and (e).

Recommendation (10): Review the extent of zoning for more intensive development to enable increasing residential development capacity, particularly around Key Activity Centres.

Recommendation (11): Revisit the analysis behind the decisions to 'up-zone' areas, with a view to including a more realistic, market-based assessment of the development potential of sites, to provide a more realistic estimate of available development capacity.

Recommendation (12): Include specific provisions in the draft proposals to allow for comprehensive development across multiple or amalgamated sites in appropriate locations.

Recommendation (13): Include an apportionment of where housing is proposed between the central area and the district rather than assuming a total capacity without any indication of the ratio of apportionment.

Providing for temporary and transitional activity

55. The draft proposals provide for temporary lifting or moving of dwellings to enable earthquake repairs, with buildings able to be lifted or moved for up to eight weeks, as long as the Council is notified. We support the Council's flexibility in ensuring that a key aspect of many building repairs can be enabled without the need for a resource consent. However, we are concerned that a period of eight weeks may not be long enough to allow for some repairs, and we consider that this should be extended to allow for greater flexibility for residents and businesses, particularly where effects on neighbours can be adequately managed, mitigated or tolerated for a short time. Clearer policies and enabling rules in this regard would be supported.
56. There is a lack of provisions specifically enabling other temporary rebuild or recovery activities across the proposals, including continuation of provision for temporary relocation of business while buildings undergo repair or rebuilding. The proposals need to provide certainty and a clear understanding of the path to recovery, including priority measures, and timeframes for any transitional arrangements.
57. The Section 32 evaluation discusses the need to transition away from the present situation where a number of businesses are temporarily located in areas that are not zoned for a commercial use. It recognises that not all businesses will be able to transition by 2016. However, the draft proposals do not contain any provisions to facilitate the transition. The replacement district plan needs to provide clear transitional arrangements so that affected businesses can make investment decisions with all of the information available to them as early as possible.
58. There is no recovery or transition related policies or rules within the Commercial Zone that provide for or guide these activities. If a resource consent applications for these activities is forthcoming the current provisions will provide limited, if any, guidance as to how these activities should be treated.

59. In addition the section 32 does not provide further details about the adverse effects from a variety of non-residential activities in the residential zone. Some further clear evaluation of the resource management issues associated with mixed use activity would assist.
60. Establishment or re-establishment of community facilities, particularly in residential zones, may be unduly restricted by the draft proposal's policies and development controls/standards. There are limited and inconsistent provisions for emergency service facilities in residential zones, and these activities could be more clearly supported in other zones where they should be encouraged, particularly in the commercial and industrial zones. The proposals should actively support other work programmes that provide for the rebuilding of community facilities and emergency services facilities.
61. There is no explicit support, and no specific guidance, provided for storage yards, depots and other 'temporary' activities that have been developed post-earthquake outside of industrial zones. Further work is required to provide a framework to achieve desired outcomes to support recovery in this regard.
62. Policy 3.6.1.4 in the Strategic Directions Proposal, recognising the need to extend provision for businesses that have temporarily needed to locate in residential areas in some circumstances, is not supported by rules in the Residential Proposal which impose strict limits on non-residential activities (a maximum of 3 per residential block, regardless of the size of the block).
63. We do not consider that the draft proposals, effectively demonstrate that the council has had particular regard to the statement of expectations, including in particular expectations (f) and (g).

Recommendation (14): Further analysis of the effects arising from activities, including business, that have located outside of key activity centres and other business zones is necessary to inform new objectives, policies and rules that will provide guidance to the community about anticipated outcomes as the recovery progresses. This is needed well in advance of April 2016 to allow business to plan ahead.

Development capacity and supporting business

64. The earthquakes resulted in a significant change to the business landscape within Christchurch. Consequently, the draft proposals need to provide an enabling environment which allows Christchurch businesses to recover and prosper.
65. The draft proposals are weighted too much towards restricting the negative effects of development rather than enabling and encouraging recovery and future growth. The draft

proposals do not clarify the extent of commercial development that is necessary for recovery or the future success of Christchurch, nor do they have a strong sense of how important the recovery of businesses will be.

66. The policies do seek to provide for commercial and industrial development and enable a wide range of activities. However, when turning to considering how these activities are enabled through the rules it is apparent that the rules are highly prescriptive and will only enable a significant number of activities within commercial areas through a resource consent process.
67. When considering the permitted activity rules in Proposal 15 – Commercial Rule 15.2.2.1 – there are no business related (retail, commercial services, food and beverage outlets for example) activities provided as permitted activities on a corner site with a Key Pedestrian Frontage. The draft proposals contain no guidance as to what activities are appropriate on these sites.
68. The draft proposals set strong standards for new development to be well designed and laid out. However, the draft proposals do not address or recognise the importance of commercial and industrial developments to function for the purpose which they were intended. Rather, the focus appears to be on ensuring that the building fits aesthetically within its environment.
69. For example, the requirement for all retail areas and or office activities to be located at the front of the buildings facing the street, except on rear sites. The needs of the business may be that the retail and office activities need to be located away from the front of the site. Such provisions will reduce the flexibility for businesses to decide how to best configure their site.
70. Additionally, the proposals set similar standards of amenity for activities in the Heavy Industrial Zone as in the General Industrial Zone. This does not recognise the difference in character of these zones, and is likely to present obstacles to redevelopment or expansion of heavy industries.
71. The draft proposals are clear about the hierarchy of commercial centres (with the Central City having primacy over Key Activity Centres and neighbourhood centres), and the type of development which it would expect to occur in each centre. This is supported by and gives effect to the Regional Policy Statement, Land Use Recovery Plan and Christchurch Central Recovery Plan.
72. The draft proposals support the central city as the key focus for commercial activity in Christchurch in the future. However, the Council needs to think more carefully about the transition period and how the market will respond to the direction provided by the

proposals in the short term, to ensure that positive investment decisions are informed by an 'open for business' approach from the council to support the recovery.

73. We are aware the Council has undertaken substantial work on many specific brownfield sites in the district, however there is no explicit support to enable or encourage the redevelopment of those sites in the proposals. Objectives, policies and rules to provide a very clear signal of support for brownfield redevelopment, in appropriate locations, may benefit the recovery.

74. The Property Group's review of the proposed commercial chapter (dated 27 May 2014) includes a number of recommended changes to the objectives and policies. Of particular relevance and importance to the Central City is the following recommendation which we endorse:

a. "Changes to Objective 1 and/or Policy 1 (or alternatively explanatory text) to explain the role of the CCRP and its relationship to the City Plan – whilst this is a general matter it is also specifically relevant to the commercial chapter." (p.2)

75. It is evident that the Central City Business and Mixed Use Zones introduced by the Christchurch Central Recovery Plan have not been included in the Draft Commercial Proposal. Our view is that the Draft Commercial Proposal should cover the entire district and thereby include commercial zones within the Central City.

76. For the reasons outlined above, we do not consider that the draft proposals effectively demonstrate that the Council has had particular regard to the Statement of Expectations, including in particular (c) and (e).

Recommendation (15): Clarify the conflicting position of the draft proposals recognising the need to extend provision for businesses that have temporarily needed to locate in residential areas not being supported by rules in the residential Proposal, where strict limits are set on non-residential activities.

Recommendation (16): Further reduce the triggers for resource consents, particularly in core commercial areas where a range of activities should be permitted in line with the zoning.

Recommendation (17): Provide a more enabling framework, using permitted activity status and clear assessment matters, to support activities that are suitable for areas that are zoned for commercial purposes.

Recommendation (18): Provide further analysis in the section 32 report to illustrate that theoretical land supply will ensure suitable and sufficient commercial, industrial

and residential activity to support communities and economic recovery and growth.

Natural hazards

77. There is a need to learn lessons from the earthquakes, and the draft proposals have an important role in providing clear and directive provisions to guide land use decision making. The Royal Commission in to the Canterbury Earthquakes, and supporting information that informed the Royal Commission, highlight the need for robust information to inform proposals. There is need for clear, legally defensible objectives, policies and rules to inform decision making. The problems that arise if there is uncertainty over responsibilities between territorial authorities and unclear plans are well known in Christchurch. With that in mind, the current approach seems to rely too much on ad-hoc decision making via consenting processes, rather than a holistic approach to avoiding, managing or mitigating hazards, particularly in areas unsuitable for urban development. The Regional Policy Statement and Land Use Recovery Plan provide further general direction in this regard, but the Council must make those provisions more specific and respond to the natural hazards and environmental conditions in the district.
78. Specific objectives and policies generally provide a clear direction of how risk to natural hazards should be treated but the overall strategic direction for managing natural hazards could be made clearer. We consider that objective 3.6.5 might oversimplify the approach taken to natural hazards, and there should be additional and clearer links to the Natural Hazards proposal outlining how the council plan to approach and manage risk from natural hazards. There could be additional context provided regarding the situation in Christchurch, and thus the importance of reducing risk to hazards.
79. Specific policy direction clarifying the extent to which rebuilding will be managed in hazard prone areas is suggested (similar to the land repair policy 5.3.5). This is particularly urgent in relation to existing use rights.
80. Due to the implications of additional planning regulations proposed and the supporting hazard mapping overlays, the modelling needs to be robust and the key decisions in creating the new hazard regulations need to be clearly justified in the section 32 analysis. Further clarification is required as to the inputs of the modelling. For example, the inclusion of increased intense rainfall events and whether this has been adjusted to account for climate change in the flood modelling; and also how hazards have been addressed in the port hills, particularly where maps apply on the edge of a section that affect the planning processes on the entire site.

81. Similarly there has been little justification into what effects these hazard overlays will have on the value of houses in these areas now affected, and how it will impact insurance settlements and recovery. With such a large number of properties now within a hazard area, economic considerations could be investigated and explained in the s32 report.
82. In relation to Natural Hazards there are still a number of definitions, wording of objectives and policies and consistent use of terminology that should be clarified to improve the understanding of provisions in this Proposal.
83. Intolerable and unacceptable risk (Policies 5.2.1, 5.5.1, 5.5.2, 5.5.3, 5.5.4) has not been defined. It is our understanding that one relates to risk to life and the other, risk to property, this needs to be clearly outlined otherwise it will be difficult to determine compliance with the objective, policy or rule. We are supportive of the risk based approach to dealing with Natural Hazards.
84. While we have not made a comparison to the existing district plan, the draft proposal does appear to appropriately set a number of permitted activities, based on permitted activity standards, for these hazards, thereby reducing reliance on the resource consent process.
85. We consider an area of uncertainty is created by the intention in the policies to 'avoid' subdivision and development where there is intolerable risk (for example, Policies 5.5.2 and 5.5.3), but with no corresponding prohibited activity in the rules, or definition or guidance on how to determine 'intolerable'.
86. The corresponding rules (Rule 5.10.1) allow non-complying resource consents to be applied for within the identified hazard areas. Under such an application, it appears it would be up to the applicant to prove the risk was not 'intolerable', in order to achieve consistency with the policy. With no definition of 'intolerable', and no guidance on how to determine if a risk is intolerable or not, uncertainty is created for the applicant, the community and the decision maker about how decision making will be undertaken.
87. In relation to additional natural hazard information provided to our officials on 18 and 24 July 2014, we have not been able to fully consider the policy implications or planning provisions and do not necessarily endorse the proposed amendments. However, we consider that the provisions relating to Slope Instability Management Areas, Mass Movement Hazard Areas and Cliff Hazard Management Areas, as outlined in material provided to our officials and in the Council resolution of 23 July 2014, should be included in the draft proposals when notified. This will ensure that we, the community and interested parties are given a full opportunity to consider those provisions and lodge submissions if necessary. The Council will need to include the detailed provisions, amend the draft

planning maps, and include all relevant technical information and analysis as part of the section 32 report in order to justify the proposals.

88. We note that the High Hazard Flooding and flood ponding areas are intended to be addressed as part of later proposals, and this seems to be appropriate given the technical information needed to inform these provisions. We strongly encourage the Council to continue to work with central government agencies and the community in developing a planning framework to respond to natural hazards issues (particularly flooding) as a priority.
89. However, we are concerned that the General Natural Hazard Policies (Section 5.2) do not appear to have any rules that implement them. Similarly, some of the flood hazard policies, and the multiple natural hazard policy, do not have any rules or other methods associated with them. This makes these policies ineffective, as they appear to support no permitted activities, and they cannot be considered in the assessment of a resource consent application unless a corresponding rule triggers the need for resource consent.
90. The mapping of hazards and corresponding rules appears to have taken account of constraints on land use as a result of natural hazards. However, following on from our comments above, we question whether prohibited activities should be considered, given the policy direction to avoid intolerable risk, and whether intolerable risk was considered or identified in the mapping process. If this course was followed, the implications for existing urban areas would need to be very carefully considered.
91. The proposals related to natural hazards need to link and ensure consistency with the Strategic Directions proposal and overall context should be added to the Natural Hazards proposal, particularly section 3.4.5 to provide more clarity on risks for the district and implications for development – it needs to be more direct. There does not seem to be a link in the Natural Hazards proposal to the ‘safe and resilient communities’ objective of the Strategic Directions proposal. The Natural Hazards proposal needs clarity on what is “acceptable risk”. Slope instability policies need to ensure a clear definition of terms e.g. life-hazard risk and how this relates to geotechnical information and the like.
92. Further clarity is required in relation to what will be considered in later proposals, particularly with regard to earthworks.
93. Further clarity is needed in relation to existing use rights, application of recession plan rules for dwellings and other related issues.
94. The proposals should reference and translate the important provisions of the Canterbury Civil Defence and Emergency Management Group Plan to inform decision making, particularly with regard to natural hazards.

95. We do not consider that the draft proposals effectively demonstrate that the Council has had particular regard to the Statement of Expectations, including in particular expectations (d) and (h).

Recommendation (19): The section 32 report needs to provide further robust evidence, including technical information, modelling and supporting information, to inform the provisions of the proposals.

Recommendation (20): Terminology and definitions need to be clear and legally robust, particularly the use of 'intolerable', 'unacceptable' and the like.

Recommendation (21): A more robust rule framework is needed to support the objectives and policies to ensure the intended outcomes for the district are achieved.

Recommendation (22): Additional information should be included in the draft proposals, relating to the central city, mass movement in the port hills, and to progress other natural hazard investigations and then including provisions in the replacement district plan to respond to those issues as a priority.

Clarity and ease of use

96. Some of the objectives and policies are clear, relevant and robust, but others are not. There are some objectives that could aim higher and be more Christchurch specific, rather than being constrained to generic planning terms and aspiring to achieve 'good urban design', or 'enabling the transport system to provide for people's needs...'. Providing clearer and more specific direction, which gives the reader an intended outcome, through the objectives and policies, will help inform decision making and facilitate a more timely recovery. Objectives and policies could also provide more specific geographic objectives that respond to the earthquakes and set out the Council's intended outcomes to be achieved. For example, although the policy framework in the Industrial Proposal clearly articulates the function and characteristics of the industrial zones, it does not clearly state the strategic outcomes for these zones and their role in the recovery and long term growth of the District.
97. The linkages from strategic objectives and policies to the more detailed objectives, policies and rules relating to particular activities and zones are not clearly stated. In some cases there is not a clear link between objectives, policies and rules. For example an objective, in the Transportation Proposal, seeking to manage effects on the transport network is not accompanied by any specific policies to achieve this, and there are no rules to implement

- policy in the Industrial Proposal supporting appropriate mixed-use development on brownfields sites.
98. The simpler structure of the draft proposals, in comparison with the existing Christchurch City Plan, improves usability. However, some parts (such as the Residential Proposal) are still difficult to navigate due to their length and complexity and the inclusion of extensive lists of matters for assessment. Some development controls seem unnecessarily complex – in some instances, such as for daylight recession planes, simpler controls are proposed for the Banks Peninsula zones, and it is not clear why these should not also be used in other zones in place of the more complex ones currently proposed.
 99. There are long lists of assessment matters in most Proposals, and some are overly broad and subjective, making them difficult to interpret. There is potential to streamline and remove overlap between assessment matters and to focus them more closely on the effects of concern.
 100. There is potential to improve linkages across draft proposals and improve cross-references. There is also some confusion in the scope of different Proposals. For example there are some policies and rules in the draft residential proposal that relate to matters more properly considered as part of subdivision proposals. Conversely, in the subdivision proposal, some land use development controls are unnecessarily applied to subdivision consent applications.
 101. It is unclear if there is intended to be a 'road zone' and we are unsure how road improvements, design and construction will be managed.
 102. Rules about some matters that should be dealt with at subdivision stage – e.g. stormwater ponds near the airport and water supply for firefighting - are in the Residential Proposal
 103. Several policies that relate to new neighbourhood developments also seem wrongly placed in draft residential proposals rather than subdivision (parts of Policy 14.1.6.1 relate to infrastructure provision, integration of residential areas and community services, open space networks; Policy 14.1.6.4 is about provision of neighbourhood centres to meet community needs; Policies 14.1.6.5, 14.1.6.6 and 14.1.6.7 are about parks/ open space networks, stormwater networks and transport networks). Policy 14.1.6.1 does address staging of development, but it is in the residential proposal rather than subdivision, so the link to assessment of subdivisions is not clear.
 104. Some assessment matters in the draft Subdivision, Earthworks and Development proposal (particularly 8.5.4.5 Building typology) include matters which are more properly considerations on land use than subdivision.

105. Linkages to external documents (such as the Council's Infrastructure Design Standards and the Christchurch Transport Strategic Plan) could also be clarified, and the direction given by those documents should inform the objectives, policies and rules of the proposals and reflect the intended outcomes that the council and community has agreed to.
106. There are also various instances of repetition, apparent errors and inconsistencies in format and content of some Proposals which need to be addressed by a general edit of the draft proposals before it is publicly notified.
107. We consider further refinement of the draft proposals is needed to adequately address the statement of expectations, including in particular expectations (b) & (i).

Recommendation (23): Many of the objectives and policies could more clearly state the intended or aspirational outcomes anticipated by the Council.

Recommendation (24): Objectives should clearly link to policies and subsequent rules. While most do, there are many instances where they do not.

Recommendation (25): We recommend that assessment matters be simplified and focused more clearly on specific effects of that need to be managed.

Recommendation (26): We recommend that consistency of content and format across the different parts of the proposals be improved by a general edit of the draft proposals before it is publicly notified.

Recommendation (27): The relationship between different parts of the draft proposals and linkages to other documents outside the draft proposals whether they are statutory or non-statutory could be made clearer.

Recommendation (28): The Council needs to review the transport elements of the plan to provide policy support to protect and enhance the freight network within the district.

Recommendation (29) The transport aspects of the proposals also need to be critically examined to ensure the proposals contain appropriate policies and rules to enable an efficient and effective strategic network following the changes that have occurred as a result of the earthquakes.

Designations

DRAFT Designations & Heritage Orders Proposal

Minister for Canterbury Earthquake Recovery

There are important changes needed to the Minister for Canterbury Earthquake Recovery Designations, related to the East and North Frames. It is unclear why the Council has amended these designations, which differs from advice provided by the Minister for the Canterbury Earthquake Recovery.

The corrections required to the Draft Designations and Heritage Orders Proposal are set out below (added text shown bold and underlined):

- **Page 75**

Designation Schedule – Minister for Canterbury Earthquake Recovery

H4 – Correction to site name text: Justice and Emergency Services

H8 – Correction to site name text: Stadium **(Incorporating Spectator Events Facility)**

It is noted that The Frame – North and East designation presently included in the current City Plan as a single designation has been split into H9 The Frame – East and H10 The Frame – North. Council officers have not provided any explanation for why this is the case and it is problematic for the reasons outlined below under the Pages 84-85 comments.

- **Page 82**

Correction to designation name: **Stadium (Incorporating Spectator Events Facility)**

- **Pages 84 -85**

As identified above, the East and North Frames have been split into two separate designations. The “Purpose” of the “Frame – North” replicates that of the East Frame despite the fact that a number of the activities/uses outlined are not anticipated to occur within the North Frame, including Christchurch Club and a family playground. The Minister for Canterbury Earthquake Recovery (requiring authority) provided written notice to Christchurch City Council on 31 March 2014 that the Anchor Project designations are to be “rolled-over” as part of the District Plan review with very few modifications. The written notice did not include a directive to split the East and North Frames into separate designations. It is therefore requested that the North and East Frames be merged together as is presently the arrangement in the current City Plan.

Minister of Health

A recent decision was made by the Minister for Canterbury Earthquake Recovery pursuant to section 27 of the Canterbury Earthquake Recovery Act 2011 to insert a designation for the Minister of Health over part of the Christchurch Hospital site. The Change was made operative by public notice on 3 July 2014 and the City Plan was deemed to be amended accordingly from that date.

We note that the Minister of Health designation which was inserted into the current City Plan Designations Chapter and Planning Map 39J on 4 July 2014 for the Acute Services Building at Christchurch Hospital has not been included in the Draft Designations and Heritage Orders Proposal nor has it been identified on Draft Planning Map 38.

APPENDIX 1

Canterbury Earthquake (Christchurch Replacement District Plan) Order 2014. Schedule 4 - Statement of expectations

The expectations of the Minister for Canterbury Earthquake Recovery and the Minister for the Environment are that the replacement district plan—

- (a) clearly articulates how decisions about resource use and values will be made, which must be in a manner consistent with an intention to reduce significantly (compared with the existing district plans)—
 - (i) reliance on resource consent processes; and
 - (ii) the number, extent, and prescriptiveness of development controls and design standards in the rules, in order to encourage innovation and choice; and
 - (iii) the requirements for notification and written approval:
- (b) contains objectives and policies that clearly state the outcomes that are intended for the Christchurch district:
- (c) provides for the effective functioning of the urban environment of the Christchurch district, reflecting the changes resulting from the Canterbury earthquakes, including changes to population, land suitability, infrastructure, and transport:
- (d) facilitates an increase in the supply of housing, including by—
 - (i) confirming the immediate residential intensification changes included in the Land Use Recovery Plan; and
 - (ii) ensuring that the district plan has capacity to accommodate up to 23 700 additional dwellings by 2028 (as compared with the number of households in the 2012 post-earthquake period); and
 - (iii) addressing further intensification opportunities, in line with the Land Use Recovery Plan principle of supporting Key Activity Centres and the Central City; and
 - (iv) having regard to constraints on environmental and infrastructure capacity, particularly with regard to natural hazards; and
 - (v) providing for a wide range of housing types and locations:
- (e) ensures sufficient and suitable development capacity and land for commercial, industrial, and residential activities:
- (f) provides for a range of temporary and construction activities as permitted activities, recognising the temporary and localised nature of the effects of those activities:
- (g) contains, as appropriate, transitional provisions for the future of temporary activities established under the Canterbury Earthquake (Resource Management Permitted Activities) Order 2011 after that order expires:
- (h) sets a clear direction on the use and development of land for the purpose of avoiding or mitigating natural hazards:
- (i) uses clear, concise language and is easy to use.