

**IN THE MATTER OF**

the Resource Management Act 1991

**AND**

**IN THE MATTER OF**

Plan Change 2 to the Kapiti Coast  
District Plan

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**PRIMARY EVIDENCE OF SAM GIFFORD  
ON BEHALF OF  
ARA POUTAMA AOTEAROA, THE DEPARTMENT OF CORRECTIONS  
(SUBMITTER # S111)**

**Planning**

Dated 10 March 2023

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## 1 EXECUTIVE SUMMARY

- 1.1 Ara Poutama Aotearoa the Department of Corrections (**Ara Poutama**) made submissions on the definitions, objectives, polices, and rules of Plan Change 2 (**PC2**) to the Kapiti Coast District Plan (**KCDP**) as they relate to providing for "community corrections activity" and "residential activities" in various residential, commercial, and industrial zones. These include:
- (a) Adding a replacement definition of "household".
  - (b) Amending various objectives and policies in the Metropolitan Centre (**MCZ**) Town Centre (**TCZ**), Mixed Use (**MUZ**), and General Industrial (**GIZ**) zones to enable "community corrections activity" in these zones.
  - (c) Adding a definition of "community corrections activity", and making "community corrections activity" a permitted activity in the Metropolitan Centre (**MCZ**) Town Centre (**TCZ**), Mixed Use (**MUZ**), and General Industrial (**GIZ**) zones.
- 1.2 The Plan Change 2 Council Officers' Planning Evidence, dated 24 February 2023 (the **PC2 Council Evidence**) does not recommend implementing this relief. It considers the relief in point (a) to be unnecessary. In regard to points (b) and (c), it considers that "community corrections activity" is captured by the definition of "community facility", which is already a provided for as a permitted activity in the relevant zones. Accordingly, it considers that no definition of "community corrections activity" or changes to objectives, policies, and rules is required to accommodate that activity.
- 1.3 In my view, a replacement definition of "household" should be included to ensure that the KCDP as amended by PC2 clearly references, provides for, and meets the needs, of a variety of households including those housed by Ara Poutama and/or its service providers within the community.
- 1.4 I consider that a specific definition of "community corrections activity" should be included within the Plan and such activities should be

specifically provided for as a permitted activity in the MCZ, TCZ, MUZ and GIZ zones, given that:

- (a) Community corrections activities are essential social infrastructure, and are a compatible and appropriate activity in commercial and industrial areas, as evidenced by examples locally within the Wellington Region and nationally, where Councils provide for community corrections activity as a permitted activity in commercial and industrial zones.
  - (b) Community corrections activities are separately defined in the National Planning Standard, and are distinguishable from, and not a sub-set of a "community facility". Accordingly, "community corrections activity" should be separately defined to form the basis for any associated rules in the KCDP as amended by PC2 to provide clarity, certainty, and avoid any misinterpretation.
- 1.5 Other than adding a definition of "community corrections activity", and a specific permitted activity rule in the MCZ zone, I consider no other changes are required to the objectives, policies, and rules to make community corrections activities a permitted activity in the MCZ, TCZ, MUZ, and GIZ zones.

## **2 QUALIFICATIONS AND EXPERTISE**

- 2.1 My name is Samuel Rodney Gifford. I hold the position of Senior Analyst Land Management and Resource Management at Ara Poutama Aotearoa, the Department of Corrections.
- 2.2 I hold a Bachelor of Science (Hons) Degree in Geography and Environmental Science from the University of Canterbury (2011). I am an associate member of the New Zealand Planning Institute. I have a decade of experience in the planning and resource management fields.
- 2.3 Previously, I have worked as both a Council officer and consultant planner where my responsibilities included planning policy preparation and advice; preparation and processing of resource consents, including expert evidence at Council hearings; and also non-statutory planning work.

- 2.4 I have been employed by Ara Poutama in the Resource Management and Land Management team for the last 3 years. In my current role, I am responsible for providing technical and strategic Resource Management advice and input to Ara Poutama, for the management of its land portfolio and strategic interests including the preparation and review of outline plans, resource consents and district plan submissions.

### **3 CODE OF CONDUCT**

- 3.1 I confirm that I have read the Code of Conduct for Expert Witnesses set out in the of the Environment Court Practice Note 2023. I have complied with the Code of Conduct in preparing this evidence and will continue to comply with it while giving oral evidence. Except where I state that I am relying on the evidence of another person, this written evidence is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed in this evidence.

### **4 SCOPE OF EVIDENCE**

- 4.1 This evidence addresses matters raised in the PC2 Council Evidence. To that end, my evidence:
- (a) Briefly summarises the relief sought by Ara Poutama on PC2 (Section 5);
  - (b) Discusses Ara Poutama's request for a definition of "household", which is recommended to be rejected by the PC2 Council Evidence (Section 6).
  - (c) Discusses Ara Poutama's request for a definition of "community corrections activity", which is recommended to be rejected by the PC2 Council Evidence, and for the provision for "community corrections activity" as a permitted activity in the MCZ, TCZ, MUZ, and GIZ zones (Section 7).

### **5 RELIEF SOUGHT**

- 5.1 Ara Poutama lodged a submission on PC2 dated 15 December 2022 (submitter number S111).

- 5.2 The PC2 Council Evidence addresses Ara Poutama’s following submission points on PC2:
- (a) The addition of a **definition of “community corrections activity”** consistent with the National Planning Standards.
  - (b) The addition of a **replacement definition of “household”** to clarify supported residential housing such as that provided by Ara Poutama are captured by the definition of “residential unit”.
  - (c) **Objectives DO-Ox2 and Policy GRZ-Px1**, whereby Ara Poutama sought they be amended to specifically enable a variety of *households* in residential zones.
  - (d) **Policies MCZ-P1, MCZ-P2, MCZ-P3, TCZ-P1, MUZ-P1, MUZ-P2, GIZ-P1, and GIZ-P2** whereby Ara Poutama sought that these be amended to enable “community corrections activity” in these zones.
  - (e) **The activity status of “community corrections activity”**, whereby Ara Poutama sought that it be provided as a permitted activity in the MCZ, TCZ, MUZ and GIZ zones.

## 6 THE DEFINITION OF “HOUSEHOLD”

### Background

- 6.1 Throughout Aotearoa, Ara Poutama delivers and manages residential housing in the community to assist people within its care with their transition and/or reintegration into the community where they have been on custodial sentences, and to assist people with proactively participating in society where they are on community based sentences. These homes accommodate people following their release from prison, those on bail and/or those serving community-based sentences (such as home detention).
- 6.2 In instances where more than one person resides at these homes, the group operates as a household participating in typical domestic activities, using the homes for sleeping, eating, cleaning, bathing and studying and the like. Depending on the needs of the residents, they receive varying levels of support and/or supervision from on-site

providers, such as help with domestic duties and responsibilities (e.g. navigating daily household chores or getting a drivers licence), rehabilitation, and/or reintegrative support (e.g. assistance with finding employment).

- 6.3 Significant demand for Ara Poutama housing exists nationally. This is in part driven by the provisions of the Sentencing Act 2002, requiring sentencing judges give consideration to community-based sentences before considering custodial sentences.
- 6.4 In order to support this statutory requirement and for Ara Poutama to fulfil its own statutory mandate, it is imperative that such residential activities are clearly provided for within the relevant plan definitions. To that end, Ara Poutama has sought in other District Plans nationally, the consistent implementation of the National Planning Standards definitions and associated plan provisions for "residential activity" and "residential unit" (both of which are included in the Operative KCDP).

**"Household": clarity of interpretation on what constitutes a "residential unit"**

- 6.5 The definition of "residential activity" entirely captures residential accommodation activities (with support), such as those provided for by Ara Poutama (i.e. people living in a residential situation, who are subject to support and/or supervision by Ara Poutama). Specifically, residential accommodation activities (with support) use "land and building(s) for people's living accommodation" (as per the definition of "residential activity") and these activities occur within "*a building(s) or part of a building that is used for a residential activity exclusively by one household, and must include sleeping, cooking, bathing and toilet facilities*" (as per the definition of "residential unit").
- 6.6 In my opinion, there is no meaningful effects basis for distinguishing residential activities which include varying degrees of support, such as those provided by Ara Poutama, from any other residential activity. Where consents for Ara Poutama's activities are required in a residential context, in my experience, they tend to be strongly opposed by surrounding residents because of perceived safety and amenity concerns associated with those in Ara Poutama's care.

6.7 However, the decision to accommodate those persons within the community has already been made by the Courts or the Parole Board through sentencing or release decisions. The District Plan should not afford Council Officers the opportunity to frustrate the statutory requirements under the Sentencing Act, Parole Act and Corrections Act. Imposing unnecessary consenting requirements on those activities, particularly when there is no material effects based differential, risks undermining the operation of the justice system and Ara Poutama's ability to fulfil its statutory obligations.

6.8 Accordingly, to provide clarity of interpretation within the Operative Plan, Ara Poutama's submission on PC2 sought the inclusion of a replacement definition of "household". The definition of "residential unit" includes a reference to household, which is currently defined in the KCDP as:

*Household: means every residential unit whether of one or more persons.*

6.9 Ara Poutama sought inclusion of a replacement definition of "household" which explicitly references the existence of support elements to avoid any misinterpretation as to what constitutes a "residential unit". The proposed definition is set out below, and has been updated to include minor corrections in wording:

*Household: means a person or group of people who live together as a unit whether or not:*

- a. any or all of them are members of the same family; or*
- b. one or more members of the group ~~(whether or not they are paid)~~ provides receives day-to-day care, support and/or supervision to any other member(s) of the group (whether or not that care, support and/or supervision is provided by someone paid to do so).*

6.10 Inclusion of this definition will ensure that the KCDP provides for, and meet the needs of, a variety of different households including those housed by Ara Poutama and/or its service providers within the community.

6.11 The National Planning Standards do not preclude Council's including additional defined terms in their District Plans where they are a sub-category of, have a narrower application, and do not have the same or

equivalent meaning as a definition in the National Planning Standards.<sup>1</sup> I consider the requested replacement definition of “household” meets these requirements.

### **Reporting Planners’ Recommendation**

6.12 The PC2 Council Evidence has made the following assessment in relation to the inclusion of a definition of household:<sup>2</sup>

*“The definition of household in the operative District plan is “every residential unit whether of one or more persons”. I consider this definition to be broad, and I do not consider that it limits the consideration of households to any particular type of household (such as a family unit or a flatting arrangement). I therefore consider the requested amendment to be unnecessary.”*

6.13 As set out above, while I agree with the PC2 Council Evidence that the current definition is broad and unlimiting, it is my opinion that providing a definition of “household” which explicitly references the existence of support elements is necessary to avoid any misinterpretation. The term “household” is not universally defined in other District Plans and it is for these reasons that Ara Poutama is seeking this relief through its submissions nationally.

6.14 On this basis, I support the relief sought by Ara Poutama, which is providing a replacement definition of “household” in the KCDP as amended by PC2. Therefore, I propose the following change be made to the definition chapter (additions underlined, deletions ~~crossed out~~):

<b><u>HOUSEHOLD</u></b>	<p><del>means every residential unit whether of one or more persons.</del></p> <p><u>means a person or group of people who live together as a unit whether or not:</u></p> <p>a. <u>any or all of them are members of the same family; or</u></p> <p>b. <u>one or more members of the group receives care, support and/or supervision (whether or</u></p>
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<sup>1</sup> National Planning Standards, section 14 Definitions Standard, point 1.

<sup>2</sup> PC2 Council Evidence, Appendix B, Table B3, Page 24.



	<i>not that care, support and/or supervision is provided by someone paid to do so).</i>
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## **7 THE DEFINITION OF “COMMUNITY CORRECTIONS ACTIVITY” AND PROVISION FOR “COMMUNITY CORRECTIONS ACTIVITY” IN THE METROPOLITAN CENTRE (MCZ), TOWN CENTRE (TCZ), MIXED USE (MUZ), AND GENERAL INDUSTRIAL (GIZ) ZONES**

### **Background**

- 7.1 Community corrections activities are a vital part of Ara Poutama’s justice system role in safely managing people serving Court or Parole Board ordered sentences/release orders within the community.
- 7.2 Such activities include non-custodial service centres and community work facilities. Service centres and community work facilities may be located separately or may be co-located on the same site. By way of further detail:
- (a) Service centres provide for probation, rehabilitation, and reintegration services. Offenders report to probation officers as required by the courts or as conditions of parole. Ara Poutama’s staff use service centres to undertake assessments and compile reports for the courts, police and probation officers. Service centres may also be used as administrative bases for staff involved in community-based activities or used as a place for therapeutic services (e.g. psychological assessments). The overall activity is effectively one of an office where the generic activities involved are meetings and workshop type sessions, activities which are common in other office environments.
  - (b) Community work facilities are facilities that enable community work programmes to be implemented by Ara Poutama. Community work is a sentence where offenders are required to undertake unpaid work for non-profit organisations and community projects. Offenders will report to a community work facility where they may undertake jobs training or subsequently travel to their community work project under the supervision of a Community Work Supervisor. The community work facilities can be large sites with yard-based activities and large equipment and/or vehicle storage.

- 7.3 The establishment and operation of community corrections activities within, and their accessibility to, communities is important to their successful operation and to the wider functioning of our urban environments. As urban communities grow and change (including through intensification), community corrections activities will need to be provided for within affected areas to ensure accessibility to those services is secured. They are essential social infrastructure and play a valuable role in reducing reoffending. They further enable people and communities to provide for their social and cultural well-being and for their health and safety, and therefore the activities and services they provide contribute to the sustainable management purpose of the Resource Management Act 1991.
- 7.4 For that reason, Ara Poutama has generally sought the introduction and or retention of "community correction activities" as defined in the National Planning Standards, as well as a permitted activity status for those activities in areas proposed for intensification. For the KCDP and PC2, those relevant areas are the MCZ, TCZ, MUZ, and GIZ zones.

#### **Appropriateness in Commercial and Industrial Zones**

- 7.5 Ara Poutama's submission on PC2 sought the inclusion of a specific definition of "community corrections activity" consistent with the National Planning Standards and that it be provided for as a permitted activity in the MCZ, TCZ, MUZ, and GIZ zones. It also sought amendment of policies MCZ-P1, MCZ-P2, MCZ-P3, TCZ-P1, MUZ-P1, MUZ-P2, GIZ-P1, and GIZ-P2 to enable community corrections activities in these zones.
- 7.6 Ara Poutama looks to locate community corrections activities in areas accessible to offenders, and near other supporting agencies where possible. Commonly, sites are therefore located in commercial or business areas, but may also be located in industrial areas, where large lots and accessibility suit the yard-based nature of some operations, and in particular community work components which may involve job training, and large equipment and/or vehicle storage.
- 7.7 Ultimately Ara Poutama requires a wide opportunity to be provided for community corrections activities to accommodate the unique, many, and varied activities provided, which are particularly appropriate for

commercial and industrial zones. The existing Kapiti Community Corrections site at 7 Arko Place, Paraparaumu which is located within the GIZ Zone is evidence of that.

7.8 There are also many examples around the country where community corrections activities are either located in, or provided for as permitted activities in commercial and industrial zones. For example:

- (a) Manurewa Community Corrections, 20 Beatty Avenue, Manurewa, Manukau – located in the Business – Light Industry Zone under the Auckland Unitary Plan.
- (b) New Lynn Community Corrections, 18 Portage Road, New Lynn, Auckland - located in the Business – Light Industry Zone under the Auckland Unitary Plan. Otara Community Corrections, 25 Bairds Road, Otara, Auckland - located in the Business – Light Industry Zone under the Auckland Unitary Plan.
- (c) Papakura Community Corrections, 22 Tironui Road, Takanini, Auckland - located in the Business – Light Industry Zone under the Auckland Unitary Plan.
- (d) North Shore Community Corrections, 71 – 73 Wairau Road, Wairau Valley, Auckland - located in the Business – Light Industry Zone under the Auckland Unitary Plan.
- (e) Blenheim Community Corrections, 1A Park Terrace, Blenheim – located in the Industrial 1 Zone under the Proposed Marlborough Environment Plan.
- (f) Christchurch Community Corrections (Annex Road), 209 Annex Road, Middleton, Christchurch – located in the Industrial Heavy Zone under the Christchurch District Plan.
- (g) Rāwhiti Community Corrections, 296 Breezes Road, Aranui, Christchurch – located in the Commercial Core Zone under the Christchurch District Plan.
- (h) Wellington Community Corrections, 42 Adelaide Road, Newtown, Wellington – located in the Central City Zone under the Proposed Wellington District Plan. Invercargill Community Corrections, 131

Eye Street, Invercargill – located in the Industrial 1 (Light) Zone under the Invercargill City District Plan.

- (i) The Proposed Waimakariri District Plan provides for “community corrections activity” as a permitted activity in the General Industrial Zone.
- (j) The Proposed Te Tai o Poutini West Coast District Plan provides for “community corrections activity” as a permitted activity in the Light and General Industrial Zones.
- (k) The Whangarei District Plan provides for “community corrections activity” as a permitted activity in the Light Industrial Zone.
- (l) The Proposed Waikato District Plan provides for “community corrections activity” as a permitted activity in the General Industrial Zone.

7.9 As community corrections activities are only administered by Ara Poutama and no other entity delivers such services across the country. In any metropolitan area, there is only ever the need for a discrete number of such facilities, commensurate with demand. Accordingly, there will not be a proliferation of them or any impact on the wider availability of industrial or commercial land as might, for example, occur with other activities in these zones.

*KCDP*

7.10 I consider providing for “community corrections activity” as a permitted activity in the MCZ, TCZ, MUZ and GIZ zones is supported by the following objectives of the KCDP as amended by PC2, and as recommended to be further amended by the PC2 Council Evidence (emphasis added):

**Objective DO-03 – Development Management –**

*To maintain a consolidated urban form within existing urban areas and a limited number of identified growth areas, and to provide for the development of new urban areas where these can be efficiently serviced and integrated with existing townships, delivering:...*

3. *an urban environment that enables more people to live in, and more businesses and community services to be located in, parts of the urban environment:*
  - a. *that are in or near a Centre Zone or other area with many employment opportunities;...*

**Objective DO-Ox1 – Well Functioning Urban Environments** – *A well-functioning urban environment that enables all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.*

**Objective DO-08 – Strong Communities** – *To support a cohesive and inclusive community where people:*

1. *have easy access and connectivity to quality and attractive public places and local social and community services and facilities;...*

**Objective DO-016 – Centres** – *To have vibrant, safe and economically sustainable centres that function as key employment and economic nodes and as a focus for social and community life, as public transport and local service hubs, and as places for living, entertainment and recreation that:*

1. *provide the primary focus for commercial (existing industrial), retail and community activities within the District;...*

7.11 Under the NPS-UD community corrections activities fall within the ambit of “community services”.<sup>3</sup> The NPS-UD’s framework of objectives and policies contain the following provisions of relevance with regard to community services, including community corrections activities (emphasis added):

**Objective 1:** *New Zealand has well-functioning urban environments that enable all people and communities to*

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<sup>3</sup> NPS-UD, Section 1.1 Interpretation: “**community services** means the following: (a) community facilities ...”

*provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.*

**Objective 3:** *Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply:*

- (a) the area is in or near a centre zone or other area with many employment opportunities*
- (b) the area is well-serviced by existing or planned public transport*
- (c) there is high demand for housing or for business land in the area, relative to other areas within the urban environment.*

**Policy 1:** *Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum: ...*

- c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; ...*

7.12 As set out above, Objective 1 provides a general objective to provide for the health and safety of people and the community, which is an overarching objective of the services provided by Ara Poutama's community corrections activities. Objective 3 provides direction for community services such as community corrections activities to be provided for in appropriate areas under District Plans, and Policy 1 directs that community services are provided in areas that are accessible to housing.

7.13 I consider, Ara Poutama's submission points made in relation to community corrections activities directly align with the purpose and intent of Objective 3 and Policy 1. These provisions of the NPS-UD support the need for more permissive treatment of community corrections activities in light of the intensification proposed by PC 2.

## Reporting Planners' Recommendation

7.14 The PC2 Council Evidence has made the following assessment in relation to the inclusion of a definition of, and the status of "community corrections activity" in the MCZ, TCZ, MUZ, and GIZ zones:<sup>4</sup>

*"Based on the description of community corrections activity (identified in S111.01), I consider that community corrections activities are a community facility under the operative District Plan.*

*The definition of community facility in the District Plan is the National Planning Standards definition, which "means land and buildings used by members of the community for recreational, sporting, cultural, safety, health, welfare, or worship purposes. It includes provision for any ancillary activity that assists with the operation of the community facility".*

*This means that under the rules of the Community Facilities chapter (specifically CF-R1 and CF-R2), community corrections activities are already a permitted activity (subject to standards) in the Metropolitan Centre Zone, Town Centre Zone, Mixed Use Zone and General Industrial Zone, as sought by Ara Poutama. I also consider that the location of community facilities in a range of zones (including the Centres and Mixed Use zones) is appropriately supported through objectives and policies in the operative District Plan.*

*On this basis I consider that community corrections activities are already provided for in the District Plan, and do not consider it necessary to amend PC2 to provide specific rules for them."*

7.15 In summary, I understand the PC2 Council Evidence considers "community corrections activity" is captured by the definition of "community facility", which are currently provided for as a permitted activity in the MCZ, TCZ, MUZ, and GIZ zones. As a result, it considers that community corrections activities are already appropriately provided for in those zones (as permitted activities), and no definition of "community corrections activity" or changes to objectives, policies, or rules is required to accommodate them.

7.16 As set out earlier in my statement, it is my opinion that commercial and industrial zones are appropriate locations for community corrections activities. In confirming that those activities would be permitted in those

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<sup>4</sup> PC2 Council Evidence, Appendix B, Table B5, Page 3.

zones under the definition of "community facility", the PC2 Council Evidence appears to endorse that position.

7.17 However, I consider that the activity status should be provided for by way of a separate definition of "community corrections activity", rather than as a "community facility" as recommended by the PC2 Council Evidence.

7.18 The National Planning Standards provide that where terms defined in the standard are used in the District Plan, and the term is used in the same context as the definition, then Council's must use the definition in the standard.<sup>5</sup> In this regard, "community corrections activity" are therefore required to be defined separately from "community facility".

7.19 In the National Planning Standards:

(a) "Community corrections activity" is defined as:

*"means the use of land and buildings for non-custodial services for safety, welfare and community purposes, including probation, rehabilitation and reintegration services, assessments, reporting, workshops and programmes, administration, and a meeting point for community works groups."*

(b) "Community facility" is defined as:

*"means land and buildings used by members of the community for recreational, sporting, cultural, safety, health, welfare, or worship purposes. It includes provision for any ancillary activity that assists with the operation of the community facility".*

7.20 While the references to *safety, health, and welfare* within the definition of "community facility" are in part consistent with the nature of community corrections activities, I consider the definition of "community corrections activity" is more explicit and definitive. Community corrections activities also provide unique and varied activities compared to community facilities, and include yard based activities which have an industrial nature and character.

7.21 Given the above, I consider "community corrections activity" is not a subset of "community facility", and that the definition of "community

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<sup>5</sup> National Planning Standards, section 14 Definitions Standard, point 1.



corrections activity” should be added to form the basis of any associated rules in the KCDP as amended by PC2. I also consider that this will be much clearer and certain, and avoid any misinterpretation. It will remove any ambiguity as to whether they are captured as a “community facility”, something Ara Poutama has faced in other Districts.

7.22 The KCDP rule framework is set up in a way that where an activity in the MCZ, TCZ, MUZ, and GIZ zones is not listed as a permitted, controlled, restricted discretionary, discretionary, or non-complying activity, then it is a permitted activity subject to complying with all listed standards. Accordingly, no change would be required to provide for “community corrections activity”. This is except in the MCZ zone where I consider a specific permitted activity rule would be required to limit the location of community corrections activity to Precinct B to align with the intent in Policy MCZ-P1 to consolidate community and civic activities in this area consistent with the MCZ Structure Plan.

7.23 I consider that the MCZ, TCZ, MUZ, and GIZ zone policies as amended by PC2 and as recommended to be further amended by the PC2 Council Evidence to be generally appropriate to enable “community corrections activity”, noting they are not specifically geared towards “community facilities”; rather they either activity neutral in their wording or enabling more generally of community activities, services, uses, and facilities which are permitted activities in these zones. Accordingly I consider no changes are required to them.

7.24 Therefore, I propose the following changes be made to the definitions, and MCZ zone rules to provide for “community corrections activity” in the KCDP as amended by PC2 (additions underlined, deletions ~~erossed out~~):

**Definitions Chapter**

<p><b><u>COMMUNITY CORRECTIONS ACTIVITY</u></b></p>	<p><i>means the use of land and buildings for non-custodial services for safety, welfare and community purposes, including probation, rehabilitation and reintegration services, assessments, reporting, workshops and programmes, administration, and a meeting point for community works groups.</i></p>
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**Metropolitan Centre Zone Rules**

<p><b><u>MCZ-RX</u></b></p>	<p><b><u>Community Corrections Activity in Precinct B</u></b></p>
<p><i>Permitted Activity</i></p>	<p><b><u>Standards</u></b></p> <p>1. <i>Activities must meet the building permitted activity standards applicable to the Metropolitan Centre Zone in MCZ-R7.</i></p>

7.25 On this basis, I support the relief sought by Ara Poutama, which is adding a definition of “community corrections activity” and providing for it as a permitted activity in the MCZ, TCZ, MUZ, and GIZ zones.

7.26 For the purposes of the further evaluation required under s32AA of the RMA, I consider this relief will be a more efficient, effective, and appropriate way to achieve the relevant KCDP objectives as amended by PC2 under s32(1)(b) of the RMA. I consider there is sufficient information to support this change given the good understanding of the environmental, economic, social, and cultural effects of corrections activities, for the purposes of s32(2) of the RMA.

**Sam Gifford**

10 March 2023