

### **Summary of position in advance of hearing**

1. My name is Mary Clay. I am the Principal Planner at Avanzar Consulting, a specialist planning and traffic engineering consultancy based in Christchurch. I have a BSc (Geography), from Canterbury University, a MAppSc (Environmental Management) from Lincoln University, and I am a Fellow of the Royal Geographical Society. I have 20 years of planning experience, gained at both territorial authorities and private practice, both here in New Zealand and overseas. I am familiar with the Christchurch District Plan and other relevant statutory documents and have been involved in the preparation of resource consents for the development at 155 Victoria Street.
2. This summary is provided in advance of my full brief of evidence that will be provided later this week to both the Council and Applicant.
3. My evidence assesses the Ryman application for resource consent from a planning perspective on behalf of Centro Roydvale Limited, who have resource consent for a hotel development at 155 Victoria Street.
4. In summary my position is as follows:
  - That the Council reporting officer has incorrectly utilised an anticipated environmental effects argument despite this approach not being appropriate in this case
  - That the access onto Dorset Street is problematic, and has potential adverse effects that must be mitigated. I will refer to Mr Facey's evidence on this matter.
  - That the development has significant effects on adjoining properties, including the commercial properties to the east of the development site, including 155 Victoria Street.
  - That although 155 Victoria Street is commercially zoned, it should not be considered to be less sensitive to effects. Effects on a commercial property might be different in scale and type, but should still be given weight in an assessment of effects.
  - That the scale of the proposed development is not appropriate in relation to the existing context of the site and the existing environment.
  - That cumulative effects of the proposal, such as effects related to recession planes, setbacks and height, are significant.
  - That the proposal, while not inconsistent with the majority of the objectives and policies, does not support them fully. A level of consistency with objectives and policies is to be expected for restricted discretionary activities.

- That the application and Council assessment have not adequately assessed effects of the proposal.
- That there has been insufficient attention given to matters of land stability and effects on adjoining properties.
- That in conclusion, it is my view that the application as it currently is proposed, should be declined.

Mary Clay 18<sup>th</sup> January 2021