

Before Hearing Commissioners  
at Christchurch

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*under:* the Resource Management Act 1991

*in the matter of:* application RMA/2020/405 for land use consent in relation to new buildings to accommodate facilities to provide services including healthcare, employment, education and housing to young people between 10 – 25

*by:* **The Youth Hub Trust – Te Hurihanga ō Rangatahi**  
*Applicant*

Statement of Evidence of Anne Eleanor Wilkins

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Dated: 8 September 2020

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## STATEMENT OF EVIDENCE OF ANNE ELEANOR WILKINS

### INTRODUCTION

- 1 My full name is Anne Eleanor Wilkins. I am the Principal Landscape Architect and Urban Designer at Novo Group. I work independently and with other specialists at Novo Group to ensure that high quality urban design is incorporated at master planning and conception stages through to implementation.
- 2 I hold a Bachelor of Landscape Architecture (Hons) and I am a Registered Landscape Architect of the New Zealand Institute of Landscape Architects (the *NZILA*).
- 3 I have over 12 years' experience in landscape architecture and urban design. During this time, I have undertaken urban, landscape and visual effects assessments across a broad range of project areas across New Zealand, including subdivisions, commercial developments, infrastructure, coastal works, marina developments, sport and park spaces, reserves, transmission lines, road projects and housing developments, for a wide range of clients including development groups and local authorities.
- 4 I have experience in providing landscape and visual and urban design effects assessments for developments of a Residential Mixed-Use nature, evaluating urban fabric, landscape suitability and interfaces with existing and surrounding land uses, working on behalf of both applicants and councils. I have written Crime Prevention through Urban Design (*CPTED*) reports for Council(s) regarding the safety provisions of design proposals.
- 5 I was engaged and provided the Urban Design Assessment for the application by the Youth Hub Trust – Te Hurihanga ō Rangatahi (the *Trust*) for land use consent in relation to new buildings (the *Youth Hub*) to accommodate facilities to provide services including healthcare, employment, education and housing to young people between 10 – 25 (the *Application*) at 109 Salisbury Street Christchurch (the *Site*). My Urban Design Assessment was submitted with the Application,<sup>1</sup> and I have been engaged to provide Urban Design expert evidence in extension to this.

### CODE OF CONDUCT

- 6 I have read the Environment Court's Code of Conduct for Expert Witnesses, and I agree to comply with it. My qualifications as an expert are set out above. I confirm that the issues addressed in this brief of evidence are within my area of expertise. I have not

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<sup>1</sup> Attached at Appendix 8 of the Application.

omitted to consider material facts known to me that might alter or detract from the opinions expressed.

### **SCOPE OF EVIDENCE**

- 7 My evidence will provide an assessment of urban design matters attached to the proposed Youth Hub. I will then go on to provide specific responses to issues raised by submitters, and matters raised in the section 42A report (the *Officer's Report*).
- 8 In preparing this evidence I have reviewed:
- 8.1 The Application and key supporting drawings (Field Architecture and Wood Landscape Architecture);
  - 8.2 Submissions lodged in relation to the Application; and
  - 8.3 The Officer's Report.

### **THE PROPOSAL AND THE SITE**

- 9 The site is located at 109 Salisbury St, adjacent to residential properties, on the outer fringe of the city within the four avenues. The site is connected to the wider city centre, via public spaces and reserves, central city public services including cycle routes and public transport bus services, and public facilities such as Tūranga.
- 10 The proposal can generally be divided into two main components. These are:
- 10.1 the residential housing; shared and separate housing units and associated outdoor areas, for both semi-private and shared spaces; and
  - 10.2 the community facilities; to cater to healthcare, education, recreation and intermittent events or gatherings.
- 11 Outside of these uses, is also a proposed café off Salisbury St, and roof top working gardens for production by Cultivate Christchurch.
- 12 The project proposal is generally arranged in a north to south alignment, with residential living configured on the east and the west boundaries, and the 'hub' in the mid-site catering to the commercial components.
- 13 The project is accessed primarily via a main entrance off Salisbury Street with a clear, marked entrance for pedestrians and visitors. While pedestrian access will be possible via Gracefield Avenue, movement will be primarily concentrated, channelled, and monitored through this key entrance point. Vehicle egress will be off

both Salisbury Ave and Gracefield Ave, for two small carparks; these are not connected across / through the site.

### **URBAN DESIGN PANELS AND RECOMMENDATIONS**

- 14 Several recommendations were made by the Urban Design Panel (the *UDP*, the *Panel*), broadly to retain and protect surrounding neighbourhood context, via changes that included a change to the basketball court, setback and landscaping to the north and wayfinding (clear routes and courtyard spaces) within the site. The Panel also supported the use and inclusion of productive planting and maximising the integration on Salisbury St for activation and the benefits to the wider community. The recommendations were included in later design iterations, with substantial changes made to include these suggestions.
- 15 Overall, the UDP were supportive of the location given its proximity to services, community spaces, reserves, and transport links to and from the Site. The Panel's comments regarding aesthetic responses, materials and interfaces were also considered.
- 16 I maintain that it is evident that urban design matters have been considered, and furthermore developed, over the duration of the project. Considerations, and potential issues have been understood and mitigated where possible, to ensure that urban design has been well considered. This assures me a robust process has taken place to include and enhance urban design at each opportunity.

### **REVIEW OF STATUTORY AND POLICY FRAMEWORK FOR URBAN DESIGN**

- 17 The policy matters pertaining to the urban design matters are within the Design Guidelines, Rule 14.15.33a Urban Design in the Residential Central City Zone of the Christchurch District Plan, which outlines:
- a. *The extent to which the development, while bringing change to existing environments:*
    - i. *engages with and contributes to adjacent streets, lanes and public open spaces.*
    - ii. *integrates access, parking areas and garages in a way that is safe for pedestrians and cyclists, and does not dominate the development.*
    - iii. *has appropriate regard to:*
      - A. *residential amenity for occupants, neighbours and the public, in respect of outlook, privacy, and incorporation of*

*Crime Prevention Through Environmental Design principles; and*

*B. neighbourhood context, existing design styles and established landscape features on the site or adjacent sites.*

*iv. provides for human scale and creates sufficient visual quality and interest.*

- 18 As reviewed in my Urban Design Assessment, the matters outlined by Rule 14.15.33a (i), (ii) and (iv) are broadly met. The proposal engages with the surrounding streets and public spaces, with visual interest, quality and human scale being well achieved. Parking and garages do not dominate the development. The key matter, therefore, is regarding Rule 14.15.33a (iii), pertaining to **residential amenity and neighbourhood context.**

#### **POTENTIAL EFFECTS; SUMMARY OF URBAN DESIGN ASSESSMENT**

##### **Residential Amenity**

- 19 I maintain that the location is not a quiet, suburban area. Residential properties are present; however, these are alongside infill projects and higher density developments and commercial uses; an anticipated urban design module of inner city living. Growth, urban spread, and land change situated inside the four avenues means a highly dynamic and adapting environment is surrounding the area. The Site is located short of 100 metres from the busy retail and commercial area, along Colombo St as well as Victoria Street area housing the Christchurch Casino, shops, cafes and restaurants.
- 20 The Site is within a fringe area, where the commercial area merges with residential. It is appropriate to have developments that respond to this fringe nature. The addition of a Youth Hub, which is that of a module of residential mixed with light commercial, is an appropriate land-use for this environment.
- 21 The boundaries to the west and to the east are residential uses. The Youth Hub services and facilities building has a north south orientation with good outlook to the surrounding wider area. The residential housing blocks are in orientation with the surrounding residential blocks. An acceptable level of sunlight and privacy has been provided for in the units and the layout reflects best use of available spaces, as well as ensuring privacy and openness. G1 and G11 garden areas of the Landscape Concept Plan (see Figure 1 below) are typical residential garden blocks, very similar to residential uses / other residential townhouses in the area.

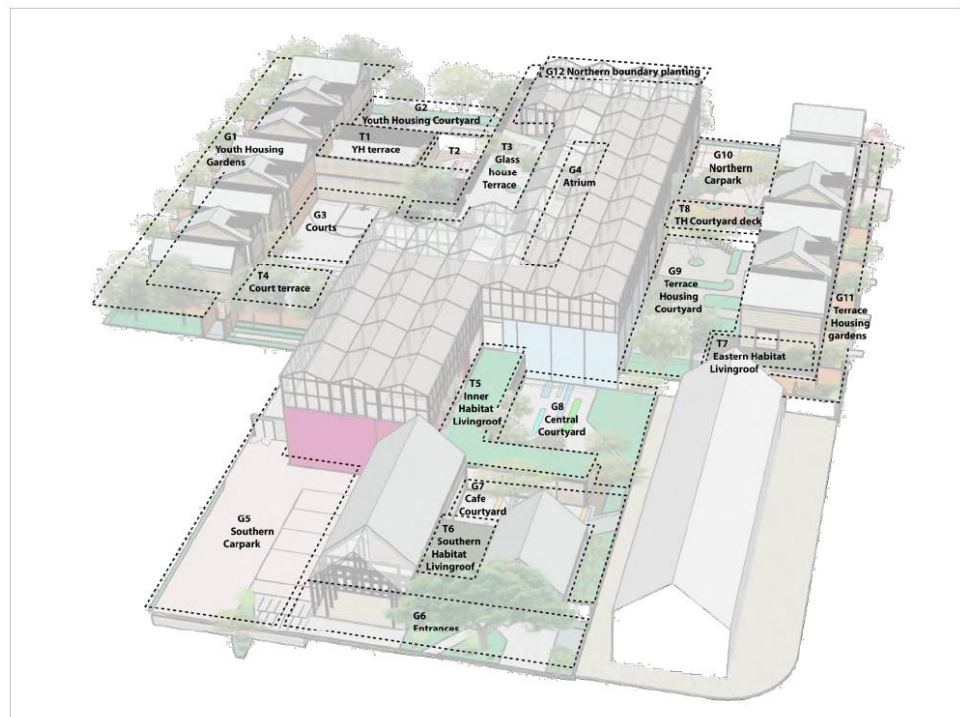


Figure 1: Landscape Concept Plan included at Appendix 3 of the Application.

- 22 The Court Terrace (T4) have been proposed with large evergreen trees to block out views to the south. I note the addition of recreational space may create disturbance by way of general movements, comings and goings, and noise. The larger events are to only occur up to 12 times per year, which limits this to outside of any 'everyday' disturbance to amenity values.
- 23 Existing mature trees and proposed landscaping will ensure integration to the surrounding areas and will offset the built forms.
- 24 The *residential amenity, for occupants, neighbours, and the public [14.15.33a(iii) A]*, will be maintained with the addition of the proposal, by way of clear delineations between public and private uses, functional managements of activities, street activation, and the tiered designed layout and site arrangement.

### Neighbourhood Context

- 25 The building layout and form for the Youth Hub generally avoids any large, flat or expansive walls. The varying ground floor layout, provides setbacks, openings, windows, courtyards and doors to provide interest, rather than static flat surfaces. The upper floors are split using different sizes of blocks, varying material, modulation in facades and variations in the roof form, and the addition of the market 'green' roof.

- 26 Aesthetically, the proposed design differs from the surrounding area. However, the area is currently mixed in appearance. The existing built forms lack any strong cohesion, mostly given the new townhouse and apartments mixed with the older styles of the area as well as the current and future development forms of high-density housing, offices and commercial built forms.
- 27 The Youth Hub will be complementary to the surrounding area, providing activation to the adapting urban environment, as well as the positive and beneficial aspects of a Youth Hub. As the context is appropriate, the proposal can sit well within the existing landscape fabric.
- 28 I reiterate that the landscape plan has a good division of public open space, semi-private resident shared spaces and private courtyard spaces. These areas provide for residents use at a communal level, or privately. The boundaries along the east and west boundaries, the G1 Youth Housing Gardens, and the G11 Terrace Housing Gardens are generally no different to what is anticipated by residential townhouse units and their associated outdoor spaces. In this way they will integrate these boundaries well.
- 29 Landscape planting, including the design for separated courtyards, private spaces, recreational use, extensive planting, and green cultivation areas, will assist in fitting into the neighbourhood context. Several specimen trees and the retention of existing trees onsite will provide environmental and amenity value (green roof and cultivation type areas). This will also assist in blending the proposal into the landscape, both at a localised and wider scale.
- 30 The *neighbourhood context; existing design styles and landscape features [14.15.33a(iii) B]*, will be maintained with the addition of the proposal, by way of mitigating landscaping, and the high-quality of the design of the buildings and the courtyards and exterior spaces. Any urban effects will be suitably absorbed and acceptable.

### **RESPONSE TO SUBMISSIONS**

- 31 A total of 81 submissions were received in response to the proposal. Below I outline the overriding themes outlined by submissions in opposition, and notes on references in support, specifically focusing on urban design. The urban design related submissions have also been addressed in the Officer's Report.

#### **Submissions in Support**

- 32 I note appraisals made by several submitters who are experienced in urban design matters. These include recent NZILA life member Di Lucas, who acknowledges the project location and setting as appropriate, and Dr Suzanne Vallance, senior urban design lecturer at Lincoln University, who cites the likely contribution of the

development to amenity in the area, the positivity of inner city mixed intensification, and the proposal's suitable location adjacent to services and public spaces.

### **Submissions in Opposition**

- 33 Many of the submissions in opposition can be generally grouped into the following issues, which I have then explored in more detail below:
- 33.1 Privacy and overlooking, particularly in relation to the Market Gardens glasshouses. Including the architectural design and perceived inappropriate scale of the built forms.
  - 33.2 Non-residential use, including scale, cumulative effects, and disturbance. This is also regarding traversing users, movement, and includes vehicles / car parking in the area.
  - 33.3 Security of adjacent properties for personal safety. Safety concerns also include loitering, and concerns of congregations and disturbances at a wider scale around the site (links to facilities and reserves).
  - 33.4 A change to character of the area, based largely on the 'transient' nature of the users, and an associated perceived change to community i.e. the 'sense of neighbourhood' would be disturbed.

### ***Market Garden and Privacy***

- 34 The market gardens are referenced as a common concern, regarding overlooking, and loss of privacy. It appears that the height is the key concern with surrounding residents. There is a 14m height limit permitted under the District Plan within this zone. The Youth Hub is proposed to be well below this height limit. Comparatively, high-density housing up to 14m high could be established on the Site, which would be associated with any number of windows, doors, balconies, and decks with 24hr frequency of use, and associated neighbours and visitors of any vocation. The gardens will operate over business hours, Monday to Friday from 8am to 4pm only, otherwise they will not be occupied.
- 35 The possibility of windows, doors or balconies at the maximum allowed height limit, with higher residential use, could comparatively create overlooking. The space is intended for working production, landscaping, gardening, and maintenance, rather than being occupied for socialising, groups, or gatherings. The area will be sporadically occupied by staff and employees and aligned with business hours, potentially with the possibility of less overlooking than what would occur with a permitted '24-7' residential use.



36 The 'T3 Market Garden Terraces' (see Figure 1 above) will predominantly be the socialising areas rather than the atrium glasshouse areas themselves. These garden terraces, where congregation is to occur, are in the middle of the site surrounded by other built forms, resulting in limited opportunities to views directly out to adjoining neighbours. The other interior courtyards are focused on the centre of the site again with limited views out to surrounding adjacent neighbouring properties.

37 There are several submissions in relation to scale and bulk. I reference in my Urban Design Assessment, the importance of visually interesting, offset forms and modulation. I believe these have been met in the design, and the dynamic forms reduce the potential for blank, flat obtrusive walls.

***Non-residential Use and Disturbance***

38 As noted in my Urban Design Assessment the character of the landscape is a mixed one, it cannot be described as solely residential. The residential area to the north is a mix of townhouses, bungalows, houses, and higher density townhouse buildings i.e. a wide variety of types of residential. There is a presence of commercial activity already, with the offices across Salisbury St, the Salvation Army building across Gracefield Ave and the mixed retail at Peterborough St. There are also several motels and accommodation facilities in and around the area.

39 Cumulative effects associated with the Salvation Army are unlikely, given the very different appearances, uses, built form and aesthetics. Rather than one large built form the Youth Hub will be a broken-up series of smaller buildings and pocket courtyards. Regarding function and use, these spaces will also be different.

40 Given the activity will be increasing numbers of comings-and-goings, this will possibly affect existing amenity values relating to pleasantness / quietness. This is related to the nature of the development, where activity is increased. However much of the activity is inwardly focused, and contained within the mid-site, away from many residential boundaries.

41 The scale is below the maximum height limits and additionally 'tiers down' to interface the lower levels (2 story) adjacent to the residential boundaries. The height scale is concentrated in the mid site to offset any scale from both streets and from the residential boundaries. I note Ms Williams reached a similar conclusion in that the scale '*collectively offers a low-rise scale that resonates with the existing scale of the neighbourhood*'.

42 The space is not intended to be used as a facility focused on events and congregations. The intention of the Hub is a quiet and for secure place removed from places of danger and disturbance, for its

residents. It is not in the interest of the facility, to create rowdiness, disorder or disturbance, but a safe and private space.

### **Safety**

- 43 The site has been designed for CPTED requirements. This includes creating clear and concise egress routes, and views through and around the site. The passive and active uses, as well as the permanent residency, will create surveillance and constant 'eyes on the site' which will deter unwanted behaviours.
- 44 CPTED principles of Quality Environments and Sense of Ownership will be met by the proposal development. The residency of the space will create ownership and pride of place, with a high level of maintenance and monitoring to ensure a protection of this high-quality environment will be maintained. This retention of ownership and quality will decrease the risk of falling into disarray leading to poor treatment, or vandalism.
- 45 I reiterate that the activation of the site, including movement of people and general presence, will add to safety and security as there will be a constant passive surveillance to the site. The mix of activities will act to deter criminal behaviour as there is a consistent 'eyes on the site' with passive and active surveillance. Mixed use (residential and commercial) and activity generators (i.e. the basketball court, market gardens, the café, and the recreational spaces) is widely associated as successful crime deterrents. The elevated upper levels will create a sense of surveillance, visibility and clear sightlines across the site.
- 46 The pedestrian entrances are defined and have a clear hierarchy. The main entrance off Salisbury St has large open areas leading directly to the doors. Gated access points also dictate movement around the site and provide for safe and secure areas. There are limited off-street direct entrances for public uses. This means that direct comings and goings will largely all be monitored and accounted for by staff and managers.
- 47 At a wider scale, there are several smaller reserve spaces, where concern is that congregations will occur in these public spaces outside of the site. Personnel will be onsite to account for movement and visitors creating accountability and monitoring will deter behaviours to occur in association with the area. A sense of shared community and surrounding 'eyes on the street' will also act increase wider protection of adjacent spaces.

### **Change to Character and Community**

- 48 The Urban Design Panel noted, in their 2019 review that '*We commend the applicant for demonstrating their intention to be a good neighbour and looking to integrate the proposal into its residential context in a sympathetic manner.*' I support this view, in

that surrounding forms, and wider community considerations have been considered and catered to in the form of changes, movement of forms to mid-site, offset of boundaries and extensive landscaping along the boundaries.

- 49 Community, rather than being defined by a certain demographic, is a collective group of people that have in common geographical, ownership and pride of place. It is anticipated that the proposal will create a sense of ownership, with the anticipation that the environment will have a high quality of care and consideration given to it, with this created possession. Ideally, the mutually beneficial opportunity of new community members, particularly youth, is considered a positive impact.
- 50 Regarding community interaction, this should not be adapted or changed with the addition of the proposal. Although the site is contained and fenced, where appropriate, there will be a level of activation created through the café, the anticipation of community gathering inclusions and the well interfaced street, both with the residential interface on Gracefield Ave and the mixed use on the southern interface along Salisbury.

#### **RESPONSE TO OFFICER'S REPORT**

- 51 I have reviewed the Officer's Report, in which Ms Jowett has outlined recommended conditions (relating to urban design) for, a lighting plan, an event management plan, and the proposed landscaping establishment and maintenance. I agree in principle with these recommendations.
- 52 I have also reviewed Appendix 3 of the Officer's Report which sets out the Urban Design Assessment by Ms Williams. The Assessment outlines that the general layout of the site is supported, given it will 'result in a safer street environment'. I agree with these findings, as there will be public facades along Salisbury Street providing an activated front, while the more private spaces are concentrated in the middle or back of the site.
- 53 Overall, I agree with Ms Williams points regarding the District Plan Section 14.15.33 review, and note that we have both reached similar conclusions, in that the proposal will largely align with the provisions of the District Plan.
- 54 I note that the recommendations include consideration of the market garden, in response to the concerns of submitters and the potential for 'overlooking'. I concur that a degree of overlooking may occur but do make note of my key points regarding height, offset and use / daily functioning. I agree with Ms Williams that additional glazing and consideration of windows and detailing could

be an acceptable solution to increase privacy, suggest without losing a degree of passive surveillance of the overall site.

- 55 I understand that the Site plans have been reviewed as a result of Ms Williams' recommendations. This is set out in more detail in the evidence of Mr Just.

### **CONCLUSIONS**

- 56 I consider the project to be in alignment with general Urban Design principles, concerning matters of amenity, context, location, interfaces, and character. Additionally, I find the proposal is in alignment with the relevant District Plan provisions, outlining specific requirements concerning engagement, access, integration and CPTED.
- 57 I maintain that significant efforts have been made to ensure appropriate interfaces, and offsets, as well as landscaping, high quality spaces and site layout, have been included over the course of the project to align with considered urban design matters. The balance of built forms will be offset by significant and well considered proposed landscaping. In this regard I support that urban design matters have been suitably explored, considered, and responded to, by a number of experts, who have established a well-considered design response.
- 58 Overall, I am satisfied that the effects of the proposed application, regarding urban design, are acceptable. The design aesthetics, layouts of internal and external spaces, and clear entrances and engagement with the surrounding streets, have resulted in quality spaces that can be integrated into the surrounding landscape fabric and character.

Dated: 8 September 2020

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Anne Eleanor Wilkins