Before Hearing Commissioners at Christchurch

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 Andrew William Just

Dated: 8 September 2020

STATEMENT OF EVIDENCE OF ANDREW [X] JUST

INTRODUCTION

- 1 My full name is Andrew William Just.
- I am Director of Field Studio of Architecture and Urbanism and hold a Bachelor of Architecture (hons) from Victoria University of Wellington. I have 10+ years' experience working in architectural practice in Christchurch post the earthquake cycles. I have been involved in several public and community focused urban initiatives, including being a founding member of Gap Filler, the Christchurch-based world-recognised placemaking initiative. Field Studio has particular interest and experience working with community-minded and values-based organisations to generate architectural and urban outcomes of broad public benefit. This, along with commercial and residential architectural practice has given us experience working with a range of scales, contexts and stakeholder groups.
- I am familiar with 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*).
- I oversaw preparation of the architectural design, the preparation of the plans for the Youth Hub (the *Plans*) and the Design Statement that were submitted with the Application.¹

CODE OF CONDUCT

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

SCOPE OF EVIDENCE

- My evidence will provide a summary of the Design Statement. It will then go on to provide specific responses to issues related to design matters raised by submitters, and then provide responses to matters raised in the section 42A report (the Officer's Report).
- 7 In preparing this evidence I have reviewed:

¹ Attached at Appendices 2 and 9 of the Application.

- 7.1 The Application;
- 7.2 Submissions lodged in relation to the Application; and
- 7.3 The Officer's Report.

SUMMARY OF DESIGN STATEMENT

Aims and Values

- As explained in the Design Statement, the design team has worked closely with local youth and youth organisations to establish architectural aims and values for the Youth Hub which have subsequently been used to guide design decision making.
- 9 The aim of celebrating diversity and providing a sense of discovery has similarly helped to inform the character and arrangement of the buildings and spaces, informing a complex of varied buildings and outdoor spaces. Specifically these have driven the design proposal to be open and accessible, whilst ensuring privacy and sense of home and security. This has resulted in the layering of spaces that is inherent in the proposal, including engaging and public aspects facing on the two street facades and more private and introverted aspects of the Youth Hub being inwardly located.

Location and Context

- 10 The design process involved contextual analysis and the design proposal has sought to contribute positively to the location and context. This is clear in the treatment of the residential units on the eastern wing of the Youth Hub, which offer a high-quality set of row-houses to the streetscape, along with planted front gardens. The design includes a fine grain, and material and formal variation/modulation in a recognisably domestic language. This is to ensure it adds positively to the residential character and nature of Gracefield Avenue.
- 11 Similarly, the Salisbury Street frontage provides a prominent entry house and a smaller café building to the side, both of small scale and drawing on but varying an architectural language of pitched roofs, appropriate to the immediate context.
- The internal boundaries are predominantly planted and have fences to ensure privacy for occupants and neighbours. The main western boundary has a smaller scale (two-storey) building with material and formal variation, and where the larger central building is closer to the boundaries there are more substantial trees proposed to be planted to help reduce the scale.

Functions and Programming

13 The varied functions and activities within the residential and other uses in the Youth Hub have been carefully arranged to appropriately establish public and private thresholds and interactions whilst also bringing the majority of non-residential activity to the interior of the site.

Connections and Circulation

14 The proposed site arrangement and circulation planning makes use of a primary entrance on Salisbury Street and a secondary entrance on Gracefield Avenue. This helps establish a clear and legible sequence of spaces that provide layers and richness of experience for occupants and helps manage privacy thresholds appropriately. Connections within the site and to the street are carefully arranged to afford a layering of engagement and interaction.

RESPONSES TO ISSUES RAISED

Bulk and Character

- As noted at paragraph 20 of the Officer's Report, submissions in opposition included concerns about the scale and character of the proposed buildings.
- The proposal has been designed to be within all of the built-form parameters of maximum building height, boundary set-backs and recession planes. This was an important design guideline in preparing the design in order to ensure against negative impacts associated with breaches of any of these aspects, for example inappropriate scale and massing or shading of neighbours.
- 17 The design sleeves the larger portions of the building with fine-grain residential uses, plantings/trees and the finer scale gabled greenhouse on the roof.
- The proposal is not an 'object in a field', but rather a linked and delineated series of spaces, plantings and buildings. The proposed building design provides substantial amounts of planting, including trees, in order to help reduce overall massing. Given the nature of the layout and massing, from any vantage point it is difficult to see the full complex, which helps to reduce the bulk and scale.
- 19 The character, scale, material, massing and quality of the buildings on the street frontages have been carefully designed to sit comfortably within and contribute positively to the character of the existing context.

Damage during construction

20 Concern was raised in one submission about damage during construction of foundations. My understanding, based on initial feedback from structural engineers is that the proposed building

- would not require foundation design/construction that would involve a high risk of damage to neighbouring properties.
- 21 It is also my understanding (and as per the recommended conditions in the Officer's Report) that a pre-works structural/condition assessment would be prepared for adjoining sites.

Overlooking and Privacy Greenhouses

- A number of submitters were concerned about the possible privacy and overlooking effects from the greenhouses of the Youth Hub. Ms Williams also covers this in her Urban Design Statement (at Appendix 3 of the Officer's Report), particularly at paragraphs 21 and 27, and recommendation 1. As a result, this aspect of the design has been revisited.
- As covered in the evidence of Anne Wilkins, there will only be sporadic use of the greenhouse between the hours of 8am and 4pm weekdays as the greenhouse is not intended to be used for socialising, groups, or gathering. Nevertheless, to ensure no overlooking can occur it is proposed that some of the windows of the greenhouses are given a translucent treatment (this treatment is yet to be determined but could be provided by way of glazing type, film, or paint treatment). This will allow light transmittance yet provide sufficient opacity so that people standing in the greenhouse will not be able to see through into neighbouring properties. This treatment is proposed to a height no less than 1500mm from finished floor level as per Ms William's recommendation. See drawings A202 and A301 of the revised plans (revision 3) attached at **Appendix 1**.
- I note that, along the south western facade, the greenhouse walls are set back over 4m from the boundary, with proposed substantial tree planting. Similarly to the north the set-back is over 3.5m and includes planting of large evergreen native beech trees as per landscape plans area G12. I consider these aspects, as well as reducing the effect of bulk of this portion of the building, adding to visual and ecological amenity, also reduce overlooking potential.

Sheltered Housing (western wing)

- 25 Paragraph 22 and Recommendation 2 of Ms Williams' Urban Design Assessment deals with concerns raised in submissions from 6/362 Durham Street North.
- As noted, the proposal complies with the 4m set-back guidelines for windows. I further note, however, that the design of 6/362 Durham street (RMA/2017/508), builds up to the 1.8m set back on the eastern boundary and includes windows to living areas within the 4m set-back, though these are noted to be 'milk' glass.

- Nevertheless, this aspect of the design has also been revisited to alleviate these concerns. As per Ms William's recommendations the amount of glazing of the two stairwells has been substantially reduced and raised up to allow daylight in but reduce overlooking potential to the properties along this boundary (refer to drawing A301 of the revised plans (revision 3) attached at **Appendix 1**). The proposed compliant glazing of the western façade of the bedroom units has not been changed, to maintain amenity for the occupants.
- Further, as per Ms William's Recommendation 3, the size of the window in the northern elevation has been reviewed and reduced. Furthermore, translucent treatment has been specified for the lower panels of the two northern windows. Refer to drawing A301 of the revised plans (revision 3) attached at **Appendix 1**.

Gracefield Housing (eastern wing)

- 29 In response to paragraphs 24 to 26 and recommendation 4 of Ms Williams' Urban Design Assessment, along with associated concerns raised in submissions from 16 and 16a Gracefield Avenue, this aspect of the design has been reviewed.
- 30 The proposed residential units on the eastern wing are located 2.3m back from the road boundary, with the stairwells being 3m back from the boundary. As noted by Ms Williams, the road carriageway at this point is 10m wide. The dwelling at 16 Gracefield Avenue is set back 4.5m from the road boundary and the ground floor outdoor area is within a full-height fence. This results in a distance from the proposed residential units of at least 12m to the property edge of 16 Gracefield Avenue and 16.5m distance to the existing dwelling. The property at 16a Gracefield Avenue is set back substantially from the road with a driveway coming to the street edge.
- The façade of the Youth Hub was designed to ensure visual interest and coherent architectural expression, amenity for the occupants and to provide visual interaction and 'eyes on the street' for increased engagement and safety. However as per Ms William's recommendation the glazing in the stairwells on the upper levels of this eastern façade have been reduced by 50% (refer to drawing A300 of the revised plans (revision 3) attached at **Appendix 1**), to reduce the perception of possible overlooking, increase privacy, but still afford daylight, views and connection with the street.
- Further, I note it is expected the windows on this facade (and other such windows around the property) will have blinds or curtains to provide a layer of privacy.

Waste Management

- In response to paragraph 20 and Recommendation 5 of Ms Williams' Urban Design Assessment the management of the service areas for the apartments has been reviewed.
- The proposal is for these areas to contain standard Christchurch City Council kerbside red and yellow bins (the 80 litre size). Green/food waste is to be dealt with within the site (in the shared courtyard area refer to drawing A200 of the revised plans (revision 3) attached at **Appendix 1**) with guidance from Cultivate.
- This will ensure the proposed bin areas, whilst smaller than District Plan recommendations, will be appropriate for waste management and can be run efficiently. This approach also helps increase awareness and management of waste and recycling for residents.

Basketball Court

Outdoor recreation and activity space was a common theme in early design workshops with young people, with basketball being a popular activity. A previous iteration of the Youth Hub design had a prominent basketball court located on the roof top. This was a very popular idea with young people involved in the design process, but concerns were raised about noise at a meeting with neighbours and at the urban design panel meeting. Consequentially the design was changed, with the market garden/greenhouses being brought up to the roof level and space allowed for a basketball court in the outdoor recreation courtyard on the ground floor.

CONCLUSIONS

- 37 The bulk and character of the proposal, including the buildings, outdoor spaces and plantings, have been carefully designed to contribute positively to the character of the existing context.
- I am confident that the proposed revisions to the plans significantly mitigate the potential for overlooking from the higher levels of the proposal and will provide an appropriate level of privacy for both occupants and neighbours.
- The further resolution of the waste management for the apartments ensures the areas as proposed are appropriate for effective and efficient management of waste.

Dated: 8	3 September	2020
Andrew	William Just	

APPENDIX 1



Resource Consent Application Rev. 3

Te Hurihanga Ō	Rangatahi
The Youth Hub	

109 Salisbury Street Christchurch New Zealand

Sheet Index					
Layout ID	Layout Name	Published	Issued Date	Current Revision ID	Issue Name
A000	Cover Sheet	\boxtimes	4/09/2020 1:54 PM	03	RC Rev 03
A001	Indicative 3D Images	\bowtie	22/05/2020 5:21 PM	02	RFI1
A002	Indicative 3D Images	\boxtimes	24/02/2020 9:57 AM	01	Resource Consent
A101	Proposed Site plan	\boxtimes	22/05/2020 5:21 PM	02	RFI1
A200	Ground Floor Plan	\boxtimes	4/09/2020 1:54 PM	03	RC Rev 03
A201	First Floor Plan	\bowtie	4/09/2020 1:54 PM	03	RC Rev 03
A202	Second Floor Plan	\boxtimes	4/09/2020 1:54 PM	03	RC Rev 03
A203	Roof Plan	\boxtimes	22/05/2020 5:21 PM	02	RFI1
A300	Elevations	\boxtimes	4/09/2020 1:54 PM	03	RC Rev 03
A301	Elevations	\boxtimes	4/09/2020 1:54 PM	03	RC Rev 03
A900	Project Zones	\boxtimes	22/05/2020 5:21 PM	02	RFI1
A901	GFA - Ground Floor	\bowtie	24/02/2020 9:57 AM	01	Resource Consent
A902	GFA - First Floor	\boxtimes	24/02/2020 9:57 AM	01	Resource Consent
A903	GFA - Second Floor	\boxtimes	22/05/2020 5:21 PM	02	RFI1
A904	Public Area - Ground Floor	\boxtimes	24/02/2020 9:57 AM	01	Resource Consent
A905	Public Area - First Floor	\bowtie	24/02/2020 9:57 AM	01	Resource Consent
A906	Public Area - Second Floor	\boxtimes	24/02/2020 9:57 AM	01	Resource Consent

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Local Authorities	X
Structural Engineer	
Landscape Architect	
Planner	X
Urban Designer	
Traffic Engineer	
Acoustic Engineer	
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	ArchiCAD	
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The Youth Hub Trust

Te Hurihanga Ō Rangatahi - The

Youth Hub 109 Salisbury Street Christchurch New Zealand

Cover Sheet

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18-008	A000	03





View of Salisbury Street entrance

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Indicative 3D Images

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Over view of site from north west

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Indicative 3D Images

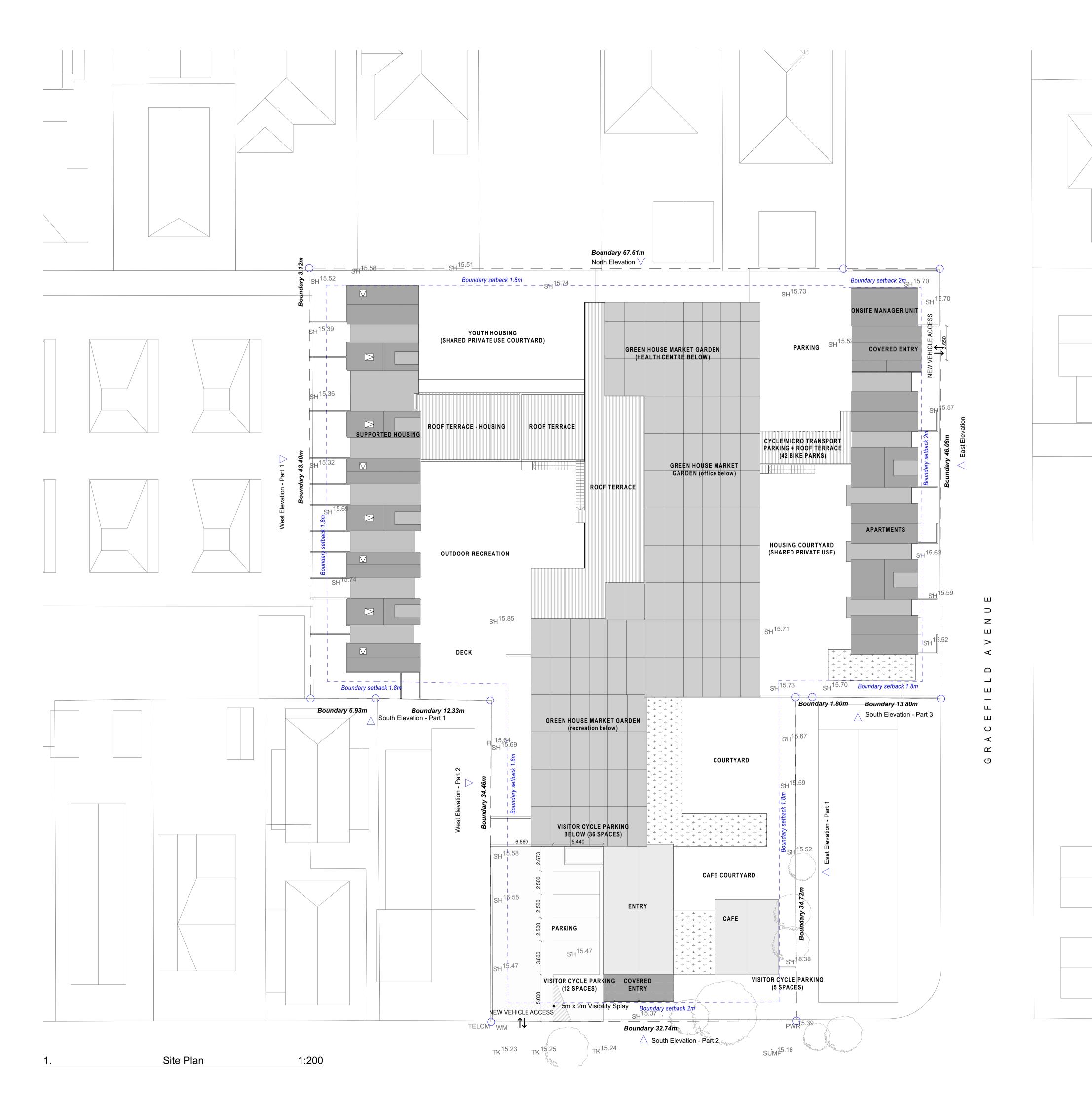
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A002



BUILDING FLOOR AREAS

4 x 3 bedroom unit 1 x 4 bedroom unit (includes 1 x accessible

Gross floor area

On site managers unit 42.75m²

Gross floor area 48.95m² Outdoor Courtyard 69.92m²

Entertainment / Event space

Gross floor area 213.67m² Public Area 195.41m²

Support Services

419.33m² Gross floor area

Basketball Court

Gross floor area Public floor area

Residential Units

bedroom)

503.55m²

Residential Activity (Youth hub housing):

22 housing units 2 supervisor units

462.31m² Gross floor area

Food and Beverage (cafe)

SITE INFORMATION

741.24m² 737.04m²

Health Care / Counselling

Gross floor area

Public area

132.92m² Gross floor area

Farm

779.04m² 190.66m²

SITE PLAN LEGEND

SH/FL 13.28

Boundary

Proposed Tree (Refer to landscape architects documents to planting details)

Vehicle Access

Surveyed levels

Greenhouse (glass) roofs

Walk-on terrace with membrane below

Possible green roof with membrane

Long-run steel roofing (Kowhai Glow)

Membrane roof

Site Coverage

Building Footprint:

Pt Lot 1 DP 40671 Residential Central City Site Description: CCC Zone: 4250m² Site Area: Building Footprint: 2236.5m²

BUILDING AREA SITE COVERAGE 2236.5m² 52.62%

52.62%

389.35m² 9.16% Refer to Landscape Architects documents to

Hardscaping and Landscaping coverage information

CYCLE PARKING

Covered Visitor 36 spaces Uncovered Visitor 17 spaces 42 spaces

SURVEY INFORMATION:

Budget Setouts LTD 28-06-19

Heights in terms of Chch Drainage Datum

RevID	ChID	Change Name	
01			24/02/2
02	CH-01	Rearrangement to single 1200mm clear pedestrain/cycle way, vehicle entrance moved north accordingly and covered entrance roof arrangement adjusted.	22/05/2
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Youth Hub 109 Salisbury Street Christchurch New Zealand

Te Hurihanga Ō Rangatahi - The

Proposed Site plan

1:200 @ A1

AK/AJ Publish Date: 4/09/2020 Resource Consent 18-008



FLOOR PLAN LEGEND

— Boundary - - - -Setback Line ----Roof Above/Below

SPACE DESIGNATIONS

AW	Accessible toilet
AWS	Accessible toilet with shower
AU	Accessible single sleeping unit with ensuite
_	5 .

Bed room Bin store Bathroom Consult room

CU On-site manager unit Green waste composting

GW Kitchen Kitchenette

Living Laundry facilities

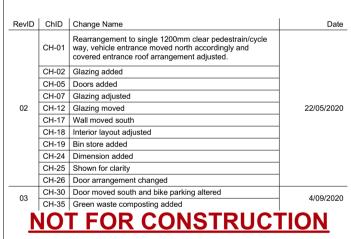
Meeting Office/Breakout

Private courtyard Residential 3 bedroom unit Residential 4 bedroom unit

Storage

Supervisor sleeping unit Single sleeping unit with ensuite

Unisex toilet



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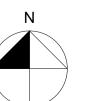
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Te Hurihanga Ō Rangatahi - The Youth Hub

109 Salisbury Street Christchurch New Zealand

Ground Floor Plan



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First Floor

FLOOR PLAN LEGEND

— Boundary Setback Line Greenhouse (glass) roofs ----Roof Above/Below Walk-on terrace with membrane below

SPACE DESIGNATIONS

	AWS	Accessible toilet with shower
	AU	Accessible single sleeping unit with ensuite
	В	Bed room
	BS	Bin store
	вт	Bathroom
	СТ	Consult room
	CU	On-site manager unit
		Dining CH-35
>	GW	Green waste composting <
9	K	Kitchen

Kitchenette

Meeting

Laundry facilities

Office/Breakout

Private courtyard

Residential 3 bedroom unit Residential 4 bedroom unit

Supervisor sleeping unit

Unisex toilet

Single sleeping unit with ensuite

Accessible toilet

RevID	ChID	Change Name	Dat	
01			24/02/202	
	CH-01	Rearrangement to single 1200mm clear pedestrain/cycle way, vehicle entrance moved north accordingly and covered entrance roof arrangement adjusted.		
	CH-02	Glazing added		
02	CH-03	Window visibility updated for clarity	22/05/202	
	CH-16	Wall moved north		
	CH-18	Interior layout adjusted		
	CH-19	Bin store added		
	CH-27	New bay window		
03	CH-32	Glazing reduced	4/09/202	
03	CH-35	Green waste composting added	4/09/202	

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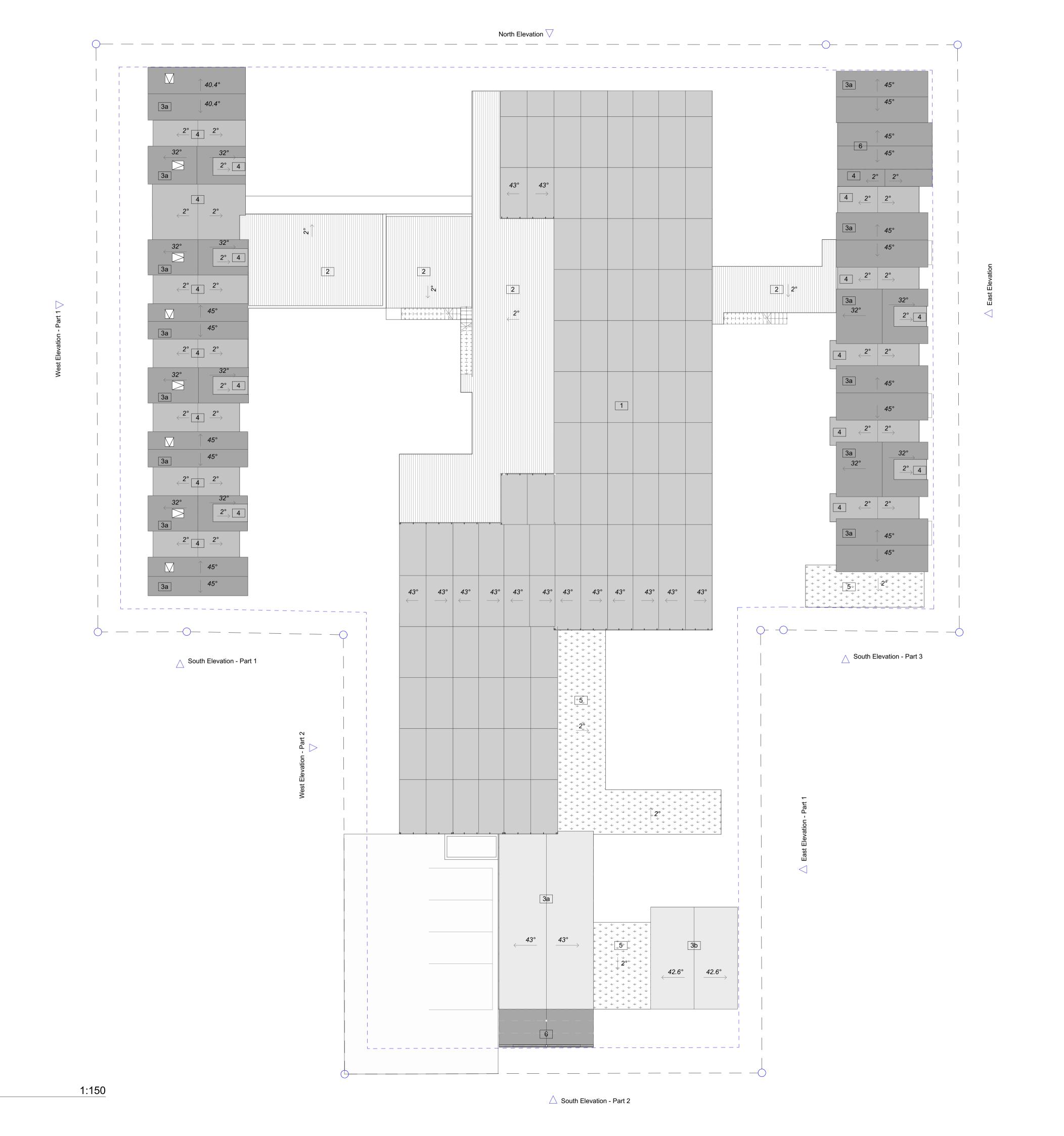
109 Salisbury Street Christchurch New Zealand

First Floor Plan



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Roof

ROOF PLAN LEGEND

Roof Pitch

Greenhouse (glass) roofs

Walk-on terrace with membrane below

Long-run steel roofing (Kowhai Glow)

Long-run steel roofing (galvanised)

Membrane roof

Possible green roof with membrane

Translucent profiled roofing

Timber Decking

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02	CH-01	way, vehicle entrance moved north accordingly and covered entrance roof arrangement adjusted.	22/05/202
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The Youth Hub Trust

Roof Plan

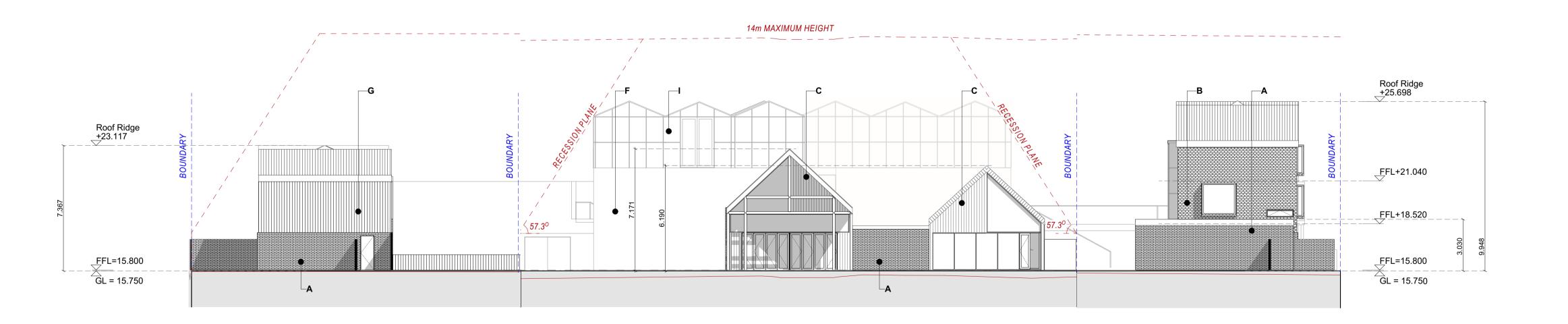
Te Hurihanga Ō Rangatahi - The Youth Hub

109 Salisbury Street Christchurch New Zealand

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A101, A200, A201, A202, A203



3. South Elevation - Part 1 1:150 A101, A200, A201, A202, A203

A101, A200, A201, A202, A203, A907

4. South Elevation - Salisbury Street 1:150 A101, A200, A201, A202, A203

5. South Elevation - Part 3 1:150 A101, A200, A201, A202, A203

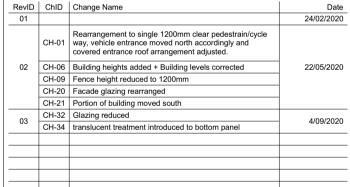
FINISHES LEGEND

Refer to 3D images on sheet A001 and A002 for indicative colour and materials

- A Brick (type & colour TBC)
- B Timber Shingles
- C Colorsteel Cladding in 'Kowhai Glo'
- Galvanised Steel Cladding
- Sarvarinesa Steel Stadain
- E Concrete with teal paint finish

G Vertical Timber Cladding

- F Concrete with maroon paint finish
- H Glazing
- I Green House (Glazing)
- J Timber Gate
 K translucent treatment
- Existing ground levels
- Proposed ground levels



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Client

The Youth Hub Trust

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109 Salisbury Street Christchurch New Zealand

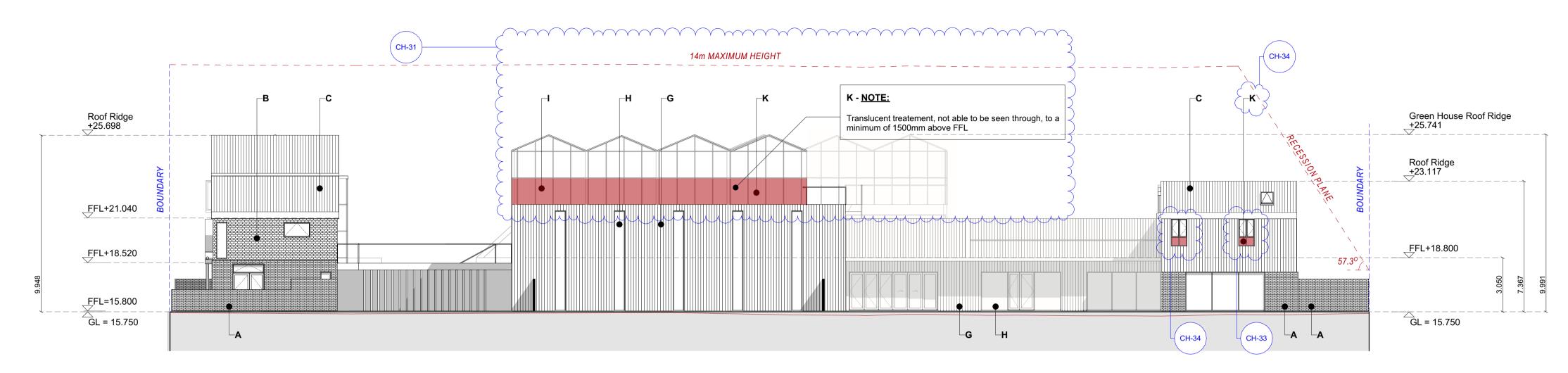
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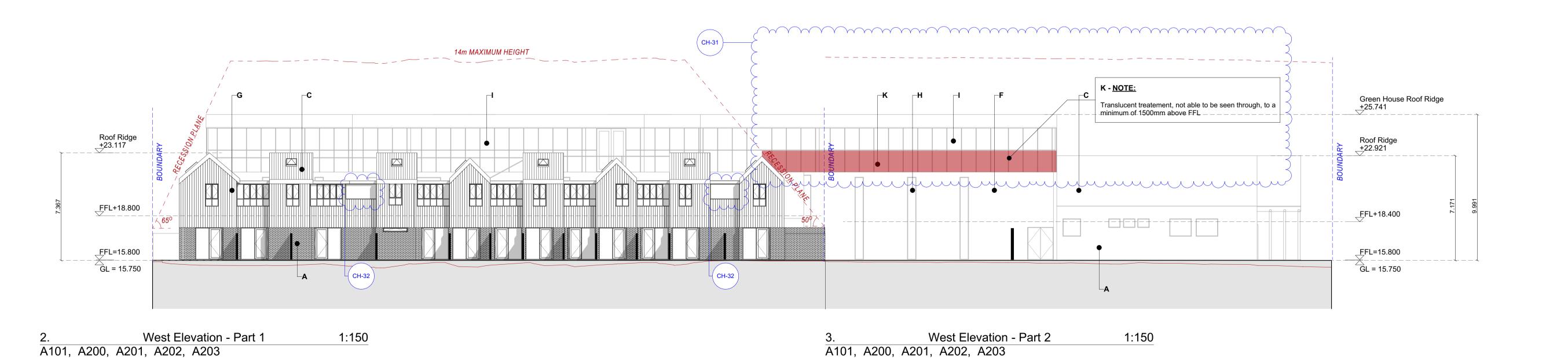
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 Resource Consent

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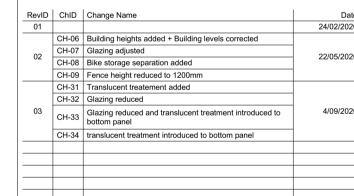
1:150 North Elevation A101, A200, A201, A202, A203



FINISHES LEGEND

Refer to 3D images on sheet A001 and A002 for indicative colour and materials

- A Brick (type & colour TBC)
- Timber Shingles
- C Colorsteel Cladding in 'Kowhai Glo'
- Galvanised Steel Cladding
- Concrete with teal paint finish
- Concrete with maroon paint finish
- G Vertical Timber Cladding
- H Glazing
- Green House (Glazing)
- Timber Gate
- K translucent treatment Existing ground levels
- Proposed ground levels



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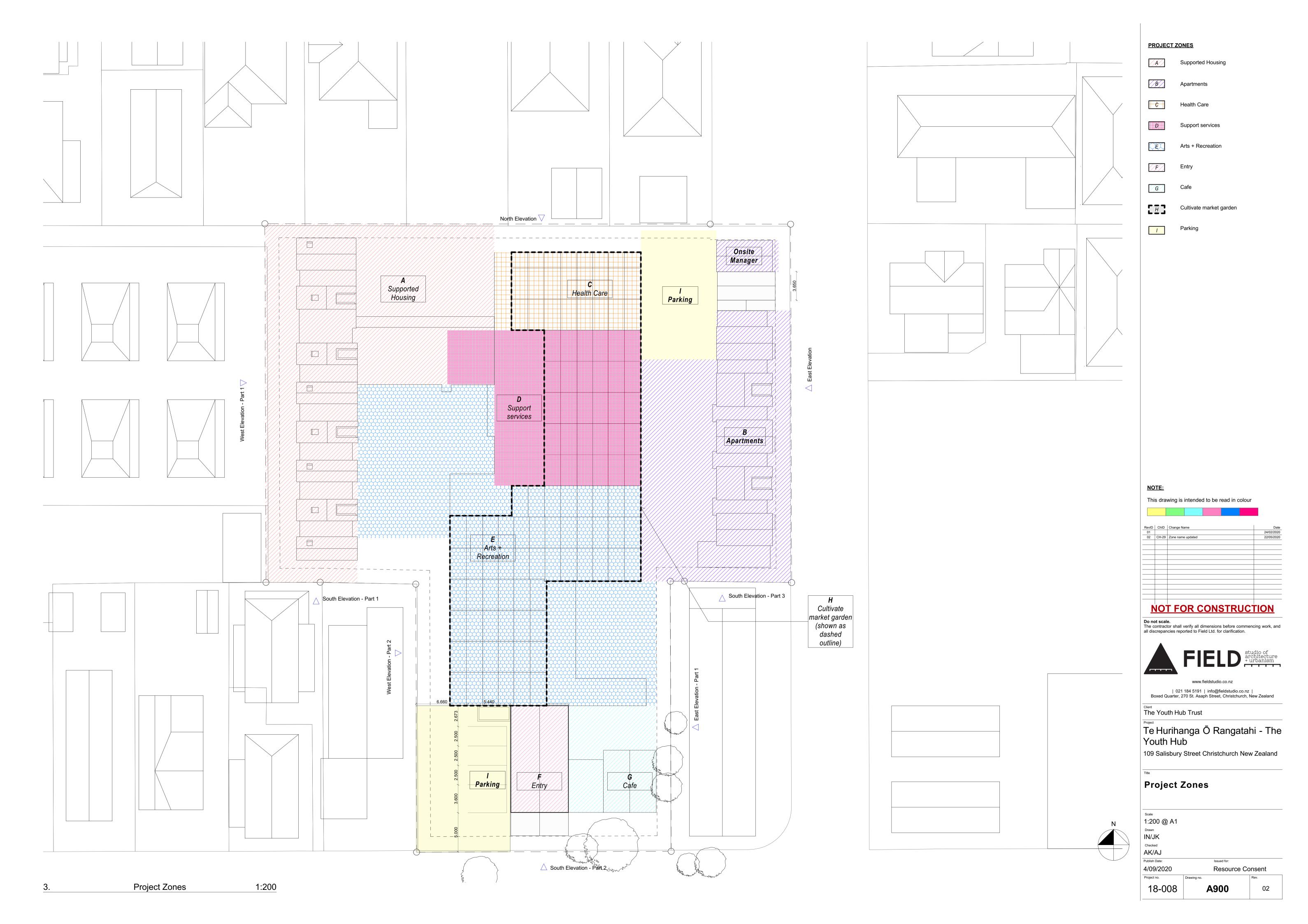
Elevations

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4/09/2020 Resource Consent

18-008 A301





GROSS FLOOR AREA - GROUND FLOOR

Zone of gross floor area

Residential Units

179.93m²

On site managers unit

Residential Activity 290.72m²

Food and Beverage (cafe)

Entertainment / Event space

551.29m²

Health Care / Counselling 103.80m²

Support Services 185.16m²

Basketball Court 132.918m²

NOTE:

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Te Hurihanga Ō Rangatahi - The Youth Hub

109 Salisbury Street Christchurch New Zealand

GFA - Ground Floor



GROSS FLOOR AREA - FIRST FLOOR

Zone of gross floor area

Residential Units 170.72m²

On site managers unit 18.52m²

Residential Activity 171.59m²

Food and Beverage (cafe)

Entertainment / Event space 189.95m²

Health Care / Counselling 109.87m²

Support Services 234.17m²

Basketball Court Nil

NOTE:

This drawing is intended to be read in colour



Do not scale.
The contractor shall verify all dimensions before commencing work, and all discrepancies reported to Field Ltd. for clarification.



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The Youth Hub Trust

Te Hurihanga Ō Rangatahi - The Youth Hub

109 Salisbury Street Christchurch New Zealand

GFA - First Floor



Scale
1:150 @ A1

Drawn
IN/JK
Checked
AK/AJ

Publish Date:
4/09/2020
Resource Consent

Project no.
Drawing no.
Rev.

A902

01

Second Floor - GFA Zones

GROSS FLOOR AREA - SECOND FLOOR

Zone of gross floor area

Residential Units 152.89m²

On site managers unit

Residential Activity

Food and Beverage (cafe)

Entertainment / Event space

Health Care / Counselling

Support Services Nil

Basketball Court Nil

NOTE:

This drawing is intended to be read in colour

RevID	ChID	Change Name	
01			2
02	CH-01	Rearrangement to single 1200mm clear pedestrain/cycle way, vehicle entrance moved north accordingly and covered entrance roof arrangement adjusted.	2
	CH-03	Window visibility updated for clarity	
	CH-04	Surface texture removed for clarity	

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GFA - Second Floor



1:150 @ A1

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4/09/2020 Resource Consent

Project no. Drawing no. Rev.

18-008 A903 02



PUBLIC FLOOR AREA - GROUND FLOOR

Zone of public floor area

Residential Units

On site managers unit

Residential Activity

Food and Beverage (cafe) (Outdoor Courtyard = 69.92m²) Entertainment / Event space

Health Care / Counselling

Support Services 91.34m²

589.09m²

Basketball Court 134.19m²

NOTE:

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NOT FOR CONSTRUCTION

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The Youth Hub Trust

Te Hurihanga Ō Rangatahi - The Youth Hub

109 Salisbury Street Christchurch New Zealand

Public Area - Ground Floor



Scale		
1:150 @ A1		
Drawn		
IN/JK		
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AK/AJ		
Publish Date:	Issued for:	
4/09/2020	Resource Co	onsent
Project no.	Drawing no.	Rev.
18-008	A904	01

PUBLIC FLOOR AREA - FIRST FLOOR

Zone of public floor area

Residential Units

On site managers unit

Residential Activity

Food and Beverage (cafe) Nil

Entertainment / Event space 138.95m²

Health Care / Counselling 91.61m²

Support Services Nil

Basketball Court Nil

NOTE:

RevID ChID Change Name

01

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NOT FOR CONSTRUCTION

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The Youth Hub Trust

18-008

Te Hurihanga Ō Rangatahi - The Youth Hub

109 Salisbury Street Christchurch New Zealand

Public Area - First Floor



Scale			
1:150 @ A1			
Drawn			
IN/JK			
Checked			
AK/AJ			
Publish Date:		Issued for:	
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Project no.	Drawing no.		Rev.
,			

A905

PUBLIC FLOOR AREA - SECOND FLOOR

Zone of public floor area

Residential Units

On site managers unit

Residential Activity

Food and Beverage (cafe) Nil

Entertainment / Event space

Health Care / Counselling

Support Services Nil

Basketball Court Nil

NOTE:

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NOT FOR CONSTRUCTION

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18-008

Te Hurihanga Ō Rangatahi - The Youth Hub

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Public Area - Second Floor

1:150 @ A1 AK/AJ Publish Date: 4/09/2020 Resource Consent

A906