

**Re: Youth Hub Trust Resource Consent Application RMA/2020/405
109 Salisbury Street, Central City Christchurch**

**Joint Statement from the
Victoria Neighbourhood Association Inc
and
Dave Kelly (Beveridge Street)**

Presented by
Dr Marjorie Manthei
Prof Dave Kelly

18 September 2020
For presentation at the resource consent hearing, 29 – 30 September 2020

Introduction

Dr Marjorie Manthei

- (1) My name is Marjorie Manthei and I live at 50 Gracefield Avenue. I am a long-term resident in this neighbourhood, as well as a member of the Victoria Neighbourhood Association Inc.
- (2) I have held several different positions in the VNA, including my current roles as Membership Coordinator and formal contact person. I also produce the newsletters and oversee most of the consultations with members and other residents on our contact list.
- (3) Relevant to my role in the VNA are my post-graduate qualifications in Education Policy and Research, with a focus on community development. My academic and professional background taught me the importance of consultation processes and community engagement. I also understand the crucial role that neighbourhoods play in the well-being, sense of belonging and safety of individuals. These aspects are reflected in many of the submissions from VNA members and were emphasised verbally during VNA's consultation.
- (4) Along with Dave Kelly (see below), I have been actively involved in the VNA's responses to resource consent applications for non-residential activities in the neighbourhood. I also have overseen many of the VNA's submissions on matters such as the City Council's Annual Plans, Long-term Plans, Local Alcohol Policy, homeshare accommodation options and District Plan reviews.
- (5) On a personal note, when my husband and I immigrated to New Zealand in 1971, we rented a flat in the central city for a couple of years before buying our first house, in Riccarton, in 1974. We shifted a few more times before coming back to the central city in 1988.
- (6) We did not expect to live in this house for as long as we have. One major renovation, initial earthquake repairs and then the arduous 'failed repairs' saga—and we are still here. My husband's statement will describe why we've lived here so long, but the short version is because we love the neighbourhood.
- (7) The location is great; it is a well-defined neighbourhood, with clear boundaries that help us interact with each other; it is the most active and supportive neighbourhood we have ever lived in and it is residential, even though it is so close to the central city business district. Surprisingly, it also is the quietist neighbourhood, at nights and on weekends, that we have lived in (except for several years after the earthquakes when Victoria Street took over as the replacement for 'the Strip').

Professor Dave Kelly

- (8) My name is Dave Kelly. I am an ecologist at the University of Canterbury. I moved to Christchurch in 1985 and first rented in St Albans, then in Salisbury Street, between Manchester and Madras Streets. I bought 6 Beveridge Street in the VNA area in 1986 and lived there for nearly 33 years. In mid-2018, when I remarried, I moved to Beckenham, but I still own the Beveridge Street house, where my sister and her partner now live.
- (9) I did not expect to live in the same house in Beveridge Street for 33 years, but found it a marvellous neighbourhood because it was so sociable and supportive. It was also surprisingly quiet in the evenings and weekends (apart from problems with bars on Victoria St after the 2011 earthquakes), and is very close to amenities, while still being purely residential.
- (10) I have been a member of the VNA since I moved into the area (I was invited to my first neighbourhood social event before I'd even taken possession of the house). I was secretary of

the VNA for more than a decade, and I am still a member of the VNA Committee because of my attachment to the area and the social contacts I have built up there.

- (11) Over the years I have been involved with many objections to RMA applications for non-residential intrusions into the VNA residential zone, and appeared at a number of hearings. My consistent opposition to non-residential intrusions comes from knowing that Beveridge Street has very high residential amenity and wanting to help protect that. In contrast, the part of Salisbury Street I lived in (less than 1 km from Beveridge Street) had much lower amenity, having commercial premises on the opposite side of the street (where Briscoes now is) and high traffic density on Salisbury Street. The experience of living there, with non-residential neighbours, was very different from what I, and others in the VNA, enjoy in the Residential Central City zone. We expand below on these important effects on residential amenity.
- (12) In short, I am here to defend the RCC zone against non-residential intrusions because this is a great place to live, and I want to protect it against major threats to that living environment. That is for my own benefit, the benefit of my sister, my many friends in the VNA, future residents and the whole of Christchurch. The City Council have said repeatedly that the central city needs 20,000 residents to support its commercial activities. The RCC is the best place to fit more residents into a high-amenity, popular environment. But that cannot and will not happen if RCC land is used instead for non-residential activities, thereby threatening the whole thrust of the District Plan to increase the number of central city residents.

The VNA's Statement

- (13) This statement is presented on behalf of the Victoria Neighbourhood Association Inc (VNA). Our joint statement also covers Dave Kelly's personal submission.

Description of the Victoria Neighbourhood Association Inc (VNA)

- (14) The boundaries of the VNA are the north side of Salisbury Street—east side of Victoria Street—south side of Bealey Avenue—west side of Colombo Street. Within these boundaries are Airedale Place, Beveridge Street, Conference Street, Durham Street, Gracefield Avenue, Montreal Street and Peacock Street. The configuration of the streets (most of which are only one-block long) make it easy to walk around the neighbourhood and connect with each other.



- (15) The VNA was formed as a residents' group in 1985. As the number of permanent residents grew, and the issues facing the neighbourhood became more serious and frequent, the group's way of operating became more formal. In 2010, we decided to incorporate, primarily because of the identified risks of a non-incorporated society appealing the approval of the Salvation Army resource consent application.
- (16) Membership criteria and operational rules were formalised; the objectives were reviewed and expanded; and for the first time, an annual subscription fee was levied. The incorporated society's most relevant objectives are:

Objectives of the Society

- 1.1 Promote appropriate and sustainable management and development of the community known as the 'Victoria' area, having regard to ecological, environmental, historical, cultural, safety, roading and community values.
- 1.2 Initiate and/or support activities that foster, enhance and/or protect the residential amenity, cohesion and quality of life within the 'Victoria' community.
- 1.3 Monitor and inform the local community of any proposed projects or schemes that may impact on the local amenities and/or the community's ecological, environmental, historical, cultural, safety, roading or community values.
- 1.4 Act as advocate for the local area / community, including taking any action that members consider necessary to protect the residential amenity, zoning and/or other interests of the local community.

- (17) VNA's structure includes a Coordinating Committee, elected at each Annual General Meeting. Its responsibilities and authorities are spelled out in the Rules and include taking action on behalf of the wider membership.

See **Attachment 1** for excerpts from the VNA Rules.

- (18) We also work closely with the other six central city residents' groups. This includes sharing newsletters, co-sponsoring events, working together on submissions and providing support to each other when needed.
- (19) Membership in the VNA Inc varies as new people move into the area and others leave. We have maintained at least 100 financial members over the past six years, with membership currently at 143 (including some who have moved into the neighbourhood and/or joined the VNA since our initial consultation about the Youth Hub).
- (20) Members live in and/or own property on all of the streets within our boundaries, as summarised in the Table 1A below. Table 1B gives an idea about the length of time current members have lived here.

Table 1A: VNA Membership by Street

Street	# Members
Airedale Place	2
Beveridge Street	35
Conference Street	17
Durham Street	19
Gracefield Avenue	35
Montreal Street	1
Peacock Street	28
Salisbury Street	4
Do not live or own property here	2
TOTAL	143

Table 1B: Time in Neighbourhood

Time	#
Less than 3 years	36
More than 20 years	41

- (21) An additional 40 – 50 residents in the VNA area participate in neighbourhood activities and/or are consulted with, according to their particular interests. We have less formal contact with another 184 households when we do a letterbox drop, including the large social housing complex (Airedale Court) on Salisbury and Conference Streets. *See Table 2, para 41 below for more information.*
- (22) The VNA has the largest formal membership of the seven central city residents' groups. We have the reputation of being the most active group, primarily because of how committed most members are to the neighbourhood and to the wider central city.
- (23) **An example of this commitment is our ability to consult meaningfully with members and others on our contact list.** Whether asking for comments on the City Council's Annual Plan, feedback on a particular proposal or opinions such as whether to oppose the Youth Hub application—**we consult all members and often achieve up to 80% response rate.** Our central city resident-group colleagues say they are in awe of such a high level of involvement. Individual submitters will explain why they are so committed and why they have opposed the Youth Hub establishing within our community.
- (24) To ensure members can have a say on matters of interest to them, the VNA consults in a variety of ways: at regular and special meetings; by email, often including a questionnaire; through our newsletters and sometimes by a door-to-door survey.
- (25) **Consultation regarding the proposed Youth Hub development commenced in January 2018 and continued to early July 2020. It included:**
- (i) a meeting arranged between Youth Hub Trust representatives (Drs Sue and Philip Bagshaw) and 14 residents/property owners living around or near the perimeter of the proposed site (31/1/18);
 - (ii) notes from the meeting distributed to VNA members and other residents in the immediate area;
 - (iii) support provided to the newly formed Salisbury West Community Preservation Group (residents and property owners described in (i) above);
 - (iv) determining who from the wider membership was available and interested in being involved in further consultations;
 - (v) notice of an 'open meeting' arranged by the Youth Hub Trust (12/10/19) circulated to our members, followed by distribution of notes and materials from that meeting;
 - (vi) ongoing consultation with available VNA members to gauge opinions about the proposed Youth Hub;
 - (vii) regular updates and consultation as we waited for the Youth Hub Trust to file their application.
- (26) **We want to add more information related to point (i) above.** When Dr Sue Bagshaw contacted Marjorie Manthei (VNA's contact person) on 19 January 2018 to give us notice of the Youth Hub plans (which we understand MP Nicky Wagner suggested), Marjorie immediately offered to organise a meeting with residents and property owners living around the perimeter of or near the proposed site. It seemed important for this group to be briefed before the media release Dr

Bagshaw indicated would be happening soon. At that time, Marjorie also explained the VNA's long-standing policy of opposing any application for non-residential activities in this Residential Central City Zone. The meeting was held on 31 January 2018, the Bagshaws' preferred date.

- (27) **We do not understand why Dr Bagshaw has given the impression in her 8 September 2020 statement of evidence that this meeting did not take place**, and that the only interaction (before the 'open meeting' organised by the Youth Hub Trust in October 2019) was the VNA turning down an offer to join the Hub's design group. We do not remember this offer being made, but if it was, we probably would have said it was premature, given that we had no details about the Youth Hub at that time.

See **Attachment 2** for copy of notes from both meetings, checked for accuracy by Dr Sue Bagshaw before distribution.

Support for VNA's Submission

- (28) When the (amended) plans for the Hub were finally filed in June 2020, they were distributed to our members, followed by formal consultation to determine what actions, if any, the VNA should take. This consultation period was from 17 – 29 June 2020, with the VNA Committee deciding to make a submission opposing the Hub on 6 July 2020.
- (29) The VNA's decision to oppose the Youth Hub application was based on **support from 97 members (82% of those available for consultation)**.
- (30) Submissions from 25 members (representing 33 individuals) also were made—from residents and/or property owners on Beveridge Street, Conference Street, Durham Street, Gracefield Avenue, Peacock Street and Salisbury Street. The reasons for submitting are summarised in para 51, below.
- (31) We noted that the number and location of submissions made by people living and/or owning property near the proposed Hub site were under-reported in the map included in the City Council Officer's report (Appendix 1, p 33 of her report). *See our amended map, below.*



Yellow dots = location of **12 additional submissions from VNA members**, missing from the map in Ms Jowett's report.

- (32) We also noted some other errors in the report, e.g. that 'a submission in opposition was received from only owner/occupiers of 3 Gracefield Avenue and that no submissions were received from owner/occupiers of 5, 7 and 9 Gracefield Avenue...' (para 37, p15). This is incorrect. **Submissions were made by both the residents of 5 Gracefield Avenue (Walter**

Logeman and Kate Tapley), the owner of #7 (Sara Bloxham) and the owners of #9 (Lewis Johnson and Patricia Obrien).

- (33) In several cases, one submission was made on behalf of more than one person. However, in our amended map, each dot represents only one submission. There are also some missing from the Salisbury West Community Protection Group membership (which we have not included on our amended version, as they are not VNA members).
- (34) There were another five submissions from VNA members: Dave Kelly (owner, 6 Beveridge Street), Lynn Kelly and Desmon Dawson (renters, 6 Beveridge Street), Tony Tresilian (26 Beveridge Street), Heather McVicar (6 Peacock Street)—all opposing the Hub application—and one from Jenny Keightley/Geoff Ridley, supporting the application.
- (35) As described throughout this statement, we consider the ‘immediate community’ to be the streets within the VNA boundaries (*refer para 14*). We operate as one neighbourhood and have members or other contacts on all the residential streets (*see Table 1, para 20*). As noted in the submission from Heather McVicar (Peacock Street), ‘*what affects one, affects us all*’. (*see paras 45 and 49 for more examples*).

See **Attachment 3 (Table 5)** for summary of consultation results.

Description of our Neighbourhood

- (36) **If people are unfamiliar with the central city residential zone, they often assume it would be an unpleasant (although convenient) place to live.** They picture houses and businesses side-by-side, a transient population, few families, little interaction with neighbours and lots of traffic/other noise. They seldom picture a ‘real neighbourhood’, which is why they might think loss of residential amenity is acceptable.
- (37) In other words, if the area is assumed to be noisy, fragmented and not particularly cohesive, some might conclude that non-residential intrusion would make little difference. We believe this bias is reflected in several of the technical expert reports on behalf of the applicant, when most effects were seen as ‘less than minor’ or, if ‘more than minor’, would be easily managed.
- (38) **Part of our job at this hearing is to provide an accurate picture of the neighbourhood,** why it is worth preserving and why the Youth Hub application is a threat to its residential amenity and even survival. *See summary of our activities in para 46, as well as a discussion of some of the misconceptions about this area, starting with para 68*).
- (39) We’ll start by describing what makes this such a good neighbourhood that we cherish.
- (i) Feeling safe: most of us feel safe walking around the neighbourhood at all hours.
 - (ii) ‘Bump’ spaces (informal ways of meeting and interacting): it is almost impossible to walk along any of our streets, or on our way to town, without bumping into several neighbours; we also have several nearby cafes where we see each other.
 - (iii) Clearly defined boundaries (one of the unusual aspects of our area, compared with the other central city neighbourhoods): the layout consists of short, straight streets between four obvious boundaries.

- (iv) High level of involvement and commitment to the area: membership in the VNA grows continuously, regardless of the number of people who leave the area; response rates to our consultations often are as high as 80%; social activities such as the monthly potlucks have continued for almost 30 years (see paras 45 - 49 for more examples).
 - (v) Close to essential services, shopping and entertainment: everything is within walking, biking or scooting distance or can be accessed by public transport.
 - (vi) Trees and open spaces: we have Aldred Reserve on Durham Street (which was created by the City Council at the request of the VNA); we are close to Hagley Park and we enjoy a 'green' environment, including the grass verges and trees on Gracefield Avenue.
 - (vii) A feeling of belonging: knowing you have support when you need it, that neighbours are looking out for you and your property, that you can ask for help and that you know many more people in the area than just your immediate neighbours.
- (40) **Preserving and enhancing the residential nature of the neighbourhood is essential for maintaining the strengths listed above.**



VNA's 'Welcome to New Neighbours' (2018)

Meeting on the street during Covid-19 lockdown (2020)



- (41) We will now describe who we are. The table below gives an overview of VNA members, as well as a composite view including other contacts.

Table 2: Demographics of the neighbourhood

	VNA (including those also part of SWCPG) ¹	VNA (excluding SWCPG)	All neighbourhood contacts
Single Women	18	17	42
Single Men	8	8	23
Couples	90 (45 couples)	66 (33 couples)	144 (72 couples)
Families	27 (13 families)	19 (10 families)	47 (21)
Ages of children in the families	babies or young children (7), ages 10-14 (7), older teens (3), over 20 (2)		babies or young children (10), ages 10-14 (10), older teens (4), over 20 (4)
TOTALS	143 members	110	256

Other information about VNA members	
Live outside VNA boundaries (e.g. own property but live elsewhere)	11
Split their time living here and elsewhere	10
Over 65 years of age (over 65 for 'all neighbourhood contacts')	53 (80)

- (42) The Youth Hub proposal includes a range of services and activities to be available not only to the wider Christchurch community, but in some cases at a national level as well. Based on the information we have (summarised in the table above), we think it is **unlikely that many residents in the immediate neighbourhood would use the services, or engage to any appreciable extent with the activities, offered by the Youth Hub.** See para 62 for further discussion of this point.
- (43) We acknowledge that the VNA membership does not cover the entire neighbourhood. Although we contact new residents as quickly as we can, and we engage with others as often as we can, we do not represent everyone who lives here.
- (44) One of the interesting aspects of this neighbourhood is the number of people who move around within the immediate neighbourhood, rather than leave, or shift back after a few years. There currently are 19 examples (11 individuals, six couples and two families). In some cases, they have owned and/or lived in three or more different houses, all within a few streets of each other. **There has to be something very special about living here to account for this unusual attachment to a specific neighbourhood.**
- (45) What are some of the reasons? Here's what a few say about why they have stayed here, even though they decided to move to another address within the same small neighbourhood.

¹ Salisbury West Community Preservation Group: residents and property owners on or near the perimeter of the proposed Youth Hub site. Some of the members of this group also are members of the VNA. To avoid confusion with submissions made by SWCPG, we have provided information about 'VNA only' members where relevant.



**Caption on for sale sign:
'He's moving...but not very far!'**

Lindsay Martin (shifting from Beveridge Street to Conference Street, September 2020)

Shortly before my wife died (at age 64), she raised the matter of my future in our large family home. She said *'You must stay in the Victoria neighbourhood if you decide to downsize and sell'.* She knew I would have support from the community if my Parkinson's condition deteriorated. Why? Because of the way we all know each other so well—it's as comfortable and familiar as 'old socks'! And not just immediate neighbours either. We have the incentive to get to know everyone, with events that involve the whole community.

Richard & Beverley Hall (Durham Street, near western boundary of the proposed Hub site):

'We have lived as owner/occupiers—in two different houses—in this part of the central city for the past 14 years. We chose the location not only because it was so close to the city centre, but also because it was truly residential and to be away from commercial activities—not an easy find, so were thrilled to find this neighbourhood. We love it here—neighbours care for and look out for each other. Unlike other places we've lived, it isn't just immediate neighbours, but also others within a couple of blocks away.'

Marg McEvedy & John Lumsden (Beveridge Street)

'We are returning to the neighbourhood after a year and a half away living in the leafy suburb of Merivale. Our reasons for returning are varied, but essentially, we missed the inner-city vibe, people living in the close-knit houses, and strolling along the streets.

Knowing that people are living in the houses in your neighbourhood is an important ingredient for security and happiness. These inner-city residential streets are a taonga, and to be respected as such. Large non-residential projects erode the very reason for people being here, and contradict the often-stated aim of encouraging inner city living. The streets are small, messy and endearing; the area needs more of that, more houses on small sections so people can live as these streets intended. Non-residential structures with masses of people coming and going 'but not living there' do not reflect that.

(46) **The number of regular activities taking place here is another reason why people value the neighbourhood.** We describe these activities in various brochures, used to welcome new neighbours or introduce ourselves at external events. Activities include:

- monthly potluck dinners—held for almost 30 years, from April to October—in different people's houses throughout the neighbourhood (publicised to 60 residents, with a different mix of 25 - 30 people attending each time;

- an annual BBQ or other gathering for everyone in the neighbourhood, held in the local pocket park (Aldred Reserve, on Durham Street);
- a 'shared bookcase', which we set up at one of the local cafes (Blax, on Victoria Street), available for anyone to use;
- a local book club, always filled to capacity;
- regular newsletters distributed throughout the neighbourhood—not just to VNA members;
- a 'Neighbourhood Noticeboard' (via email) that anyone can post messages on, e.g. properties for sale or rent, requests for information or assistance, items for sale;
- a Facebook page, set up during the Covid-19 lockdown, as a way of staying in touch and checking whether any assistance was needed (has continued operating since then);
- bi-monthly VNA meetings open to all members; Annual General Meeting open to anyone living in or owning property in the neighbourhood;
- special events, such as Meet the Candidates for local and national elections and briefings on matters of interest (e.g. planning regulations, Airbnb options, panel discussions);
- miscellaneous activities, such as working bees (Aldred Reserve, Clutter Clean Up) and Bring 'n Buy sales.
- Certificates of Appreciation, awarded to people / organisations who have helped make this such a wonderful place to live (includes Blax Café, Gordon Smith Fruiterers, Vic's Café & Bake, SCIRT, Central Library Peterborough, Procope Coffee House), the first of which was covered by CTV.



Annual BBQ in Aldred Reserve (February 2020)

Being entertained by one of the younger neighbours





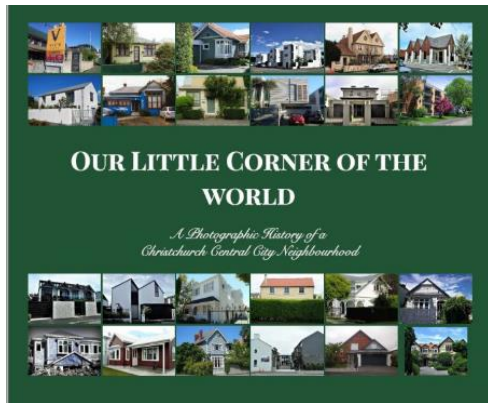
Durham Diners potluck (2018)

- (47) **Our activities, love for and pride in our neighbourhood, and how it had developed over the years, are captured in a professionally printed book published in 2018. ‘Our Little Corner of the World: a photographic history of a Christchurch central city neighbourhood’, a 290-page book that traces the history of every house in the neighbourhood from the year 2000 (and in some cases, well before that), shows how we interact with each other and gives personal accounts of the area’s history. Copies were purchased by the Christchurch library, and over 50 purchased by individuals. The book was nominated for a NZ Heritage Book Award in 2019.**



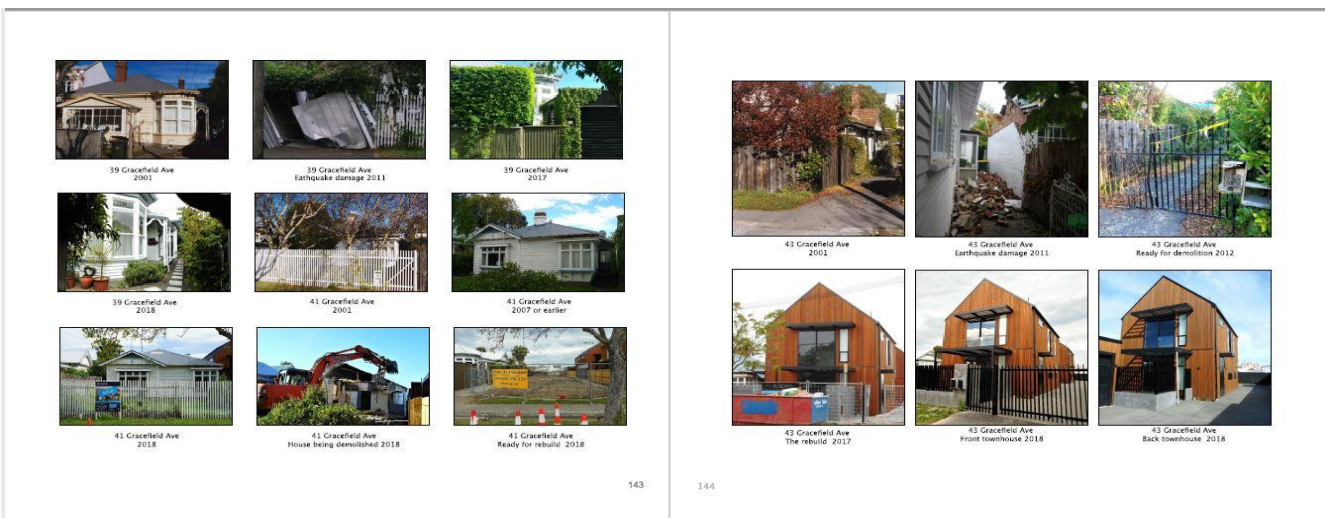
Neighbours and friends coming together for the Book Launch and Certificates of Appreciation awards (21 August 2018) at Knox Centre

- (48) **A copy of the book will be tabled** at the hearing, as another way of explaining why we care so much about what happens in our neighbourhood.



Cover of hard cover book

Sample pages from the published record of our neighbourhood (2018)



(49) We'll finish this section with the voices of some of the other members living here:

Kathryn & Winston Bowler (Beveridge Street), residents since June 2020:

'We moved here from a suburb where we had lots of interactions with our neighbours. We thought we'd have to live in our own little bubble here in the central city—but accepted the trade-off because of how convenient it is. We were surprised by how friendly and welcoming everyone has been, how many neighbourhood activities there are and how many invitations we've had for drinks, afternoon tea, neighbourhood pot lucks etc. It blew us away! We already have stronger ties than we did before. It's also very quiet, especially at night and weekends, which surprised us. Definitely a residential neighbourhood in the best sense'

Sheila Hailstone (Beveridge Street), resident since 1992:

'Unlike many neighbourhoods, when the earthquakes struck, we already knew almost everyone living here. This is because of the strong links fostered by the VNA, but also because people enjoy participating in regular social gatherings and seeing each other as we walk around the neighbourhood. It was easy to build on these links during and after the earthquakes, as well as during the more recent Covid-19 lock-down. We must protect the residential feel and look of the neighbourhood. This means continuing to fight non-residential intrusion, as we've been doing.'

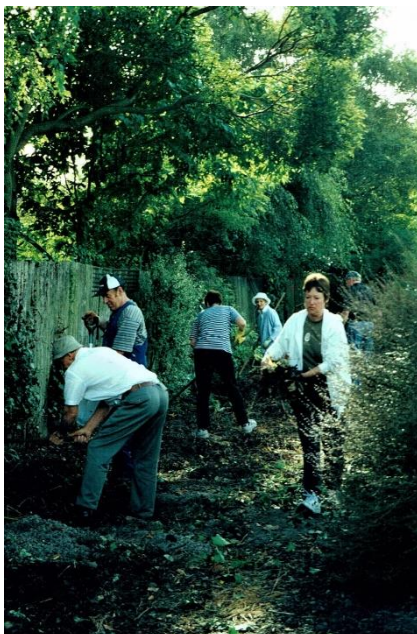
Tony Tresilian (Beveridge Street), resident since 2006

'What's special to me? I can knock on at least 30 doors in this neighbourhood and ask to borrow an onion or an egg!'

Heather McVicar (Peacock Street), resident since 1998:

'This neighbourhood has an amazingly supportive group of residents, with an incorporated society that has made great efforts over the years to maintain the residential nature of the area. We also have close personal ties with neighbours—and not just those on our own street.'

I'm currently the coordinator of 'Durham Diners' (our monthly potlucks during the winter months, for over 25 years) and connects 'neighbours' throughout the area. Although I do not live in close proximity to the proposed Hub site, I feel so closely connected to the neighbourhood that what affects one, affects us all.



Working bee in Aldred Reserve (2001)



Sharing cake from cancelled March 2019 neighbourhood event with families in the nearby social housing complex

Main Points of VNA's Statement for this Hearing

- (50) This statement provides explanations and additional details to support the points covered in the 8 July 2020 VNA submission opposing the Youth Hub application.
- (51) **The points in our submission focussed on the following:**
- (i) the cohesion of the Victoria neighbourhood (which stretches from the proposed Youth Hub site on Salisbury Street, all the way to Bealey Avenue) and the threat to that cohesion when any site is used primarily for non-residential activities;
 - (ii) the VNA's long-standing opposition to non-residential intrusion (see Table 3, para 75);
 - (iii) the large scale of non-residential activities proposed for the Hub site (including the hours; number of social / health / other services on-site; and the number of expected staff, clients and others visiting the site);
 - (iv) negative effects on residential amenity (including the impact of traffic, vehicle access from Gracefield Avenue, noise, a 200-seat events centre and a commercial café);
 - (v) lack of a convincing strategic or operational need for locating the Hub and its non-residential activities on this particular site, within a residential setting.
 - (vi) non-complying and other aspects that are inconsistent with the expectations set out in the District Plan (including Policy 14.2.6.8 and 14.2.6.1).
- (52) In particular, we believe the application is contrary to the District Plan policy **14.2.6.1 (Residential cohesion, character and amenity)**, as summarised below.
- (53) The Youth Hub would have a negative impact on **residential cohesion** because of:
- (i) the site's prominent and clearly visible location at the southern boundary of our residential neighbourhood;
 - (ii) the location of non-residential activities there, which effectively shifts the boundary of the Business and/or Mixed Use Central City Zones into the centre of the Salisbury Street – Gracefield Avenue block;
 - (iii) the scale of the non-residential activities on this large tract of land;
 - (iv) the number of current or consented dwellings sharing a boundary with or in very close proximity (on all sides) of the site—*whose* residents would experience directly the negative effects from such large-scale non-residential activities (*see Table 4 in para 110 and paras 111 - 112 for details about the number of residences in this category*);
 - (v) the impact on the rest of the neighbourhood because of decreased amenity overall and loss of 'neighbourliness' (*refer paras 39 – 40 and 113*);
 - (vi) the likely precedent that approval of the Hub application would set, even if only by the existence of approved non-residential activities—which future applicants would then cite to bolster their case (in the same way the applicant cited the existence of the Salvation Army).

- (54) The Hub also would have a negative impact on **residential amenity**, due to:
- (i) the large number of staff, clients and other visitors expected to access the on-site services (anticipated to be 200 or more per day), with the majority coming from across Christchurch or even further away (not from the immediate surrounding community);
 - (ii) the commercial activities (café and events centre, both of which are significantly larger than what is anticipated in a residential area);
 - (iii) the range of other on-site activities (recreational, training, drop-in spaces, arts, 24-hour services, social gatherings for large numbers);
 - (iv) the hours that the non-residential activities would operate, well in excess of the ‘owner-occupied’ businesses in the neighbourhood;
 - (v) the type of noise and other disruptions from the site—different from what would be expected from residential activities (for example, a basketball court available to off-site visitors as well, dances/other events, drama and music performances, outside courtyard for a café);
 - (vi) loss of the potential use of the site for what would reasonably be considered ‘residential’, and the value this would add to the community.
- (55) We note that Policy 14.2.6.1 supports **Objective 14.2.4 (High quality residential environments)**, which aims for ‘*sustainable residential neighbourhoods*’, with a ‘*high level of amenity*’ (14.2.4 a). Residential neighbourhoods, especially those in the central city, are not sustainable if residential land continues to be eroded by large scale non-residential (or only partially residential) activities. The majority of long-term residents in these neighbourhoods value residential amenity, to the point that they are likely to consider living elsewhere if this quality was lost.
- (56) **The policy, 14.2.1.3 (Residential development in the Central City) covers the importance of ‘the protection of amenity of inner city residential neighbourhoods’ (a, iii).** The VNA was instrumental in this clause being included to the replacement District Plan, through its submissions to the Independent Hearings Panel. This clause acknowledges the particular vulnerability of central city residential neighbourhoods, and the pressure they are subjected to by non-residential intrusion.
- (57) Our argument to that Panel was that (i) high-level policies and objectives made it clear what was expected in Residential Central City zones, and (ii) there were other references to new developments, but (iii) there needed to be clarity about protection of existing neighbourhoods as well. **The Youth Hub would undermine our expected ‘protection’ from non-residential activities.**
- (58) We believe the Youth Hub will compromise the pleasantness of and our enjoyment of the place we have chosen as our home. We discuss the importance of ‘amenity’ throughout this statement.
- (59) The Youth Hub also is contrary to **14.2.6.8 (Non-residential activities in central city residential areas)**, as summarised below.
- (60) The Hub is **not small scale** (14.2.6.8 a i).

- (i) **The number of agencies to be located at the Hub has grown steadily** from what were told at the first meeting in January 2018 (*'a group of agencies, primarily Youth Line and 298 Youth Health²*), to what was outlined at an open meeting in October 2019 (approximately 13), and then again in the application itself (up to 20 in the Operational Statement in Appendix 4 of the application). We note that the 8 September 2020 update from Dr Bagshaw still refers to 13 agencies, although she also states that, *'...possible over time for other agencies to be incorporated into the Youth Hub on a visiting basis that has not yet been determined'* (para 41). This is not small scale, and the number of possible agencies is left open-ended. *Also see para 118 in our statement.*
 - (ii) **The café is also not small** scale, now with seating for 35, open daily.
 - (iii) The proposed **events centre seats 200** and is to be used for a variety of social events, performances and conferences not associated with a residential area. Large events (120 – 200 participants) could occur each fortnight. This is not what residents choosing to live in a residential area would reasonably expect.
 - (iv) The **recreation centre can cater for 50** participants at a time.
- (61) The activities are **not compatible with residential activities** (14.2.6.8 a i); for example, the hours (24/7 in some cases), variety of non-residential activities (see above), number of visitors from outside the area, the number of agencies involved and associated traffic issues.
- (62) The Hub's services are **not focussed on the needs of the local residential community** (14.2.6.8 (a ii)).
- (i) **The applicant seems to suggest that the local community extends much further than this policy indicates.** The wording in the policy is *'local residential community'* [emphasis added] and is clearly defined by the zoning overlay maps. The concept of 'local' also is well understood by such conventions as the boundaries of residents' groups, recognised by Community Board and the City Council (see page 2 of this statement for details of the VNA's boundaries).
 - (ii) As explained in paras 41 – 43 and Table 2 above, we believe it is unlikely that a significant number of Youth Hub clients would come from within the immediate community. A survey of members and other residents who we could contact was carried out in 2019 to estimate the number of families with school-age children. We were advocating for play equipment in our local community park on Durham Street. At that time, **35 families were identified**, although others said their grandchildren often visited. There were few families in the social housing complex (Airedale Courts) then because not all units were re-occupied since earthquake repairs were completed (and two of the buildings had been demolished). There could be additional families there now.
 - (iii) The proposed Hub and its non-residential activities, therefore, are **unlikely to serve the needs of what is largely a residential community**. The Youth Hub Trust has a strong focus on the non-residential activities serving not only the wider Christchurch area, but the provision of some elements at a regional or national level as well.

² See Attachment 2 for notes from this meeting, checked for accuracy by Dr Sue Bagshaw. Subsequent email communication confirmed *'There are a long list of people who have expressed interest but the three you have are the main ones'* [9 February 2018].

- (iv) The application also states that the café and gallery are *'for benefit of the wider community'* (para 56, p 14). As several submitters have pointed out, **the local community (which is the focus in the District Plan) does not need another café**. There are plenty within easy walking distance on Victoria Street, Colombo Street and Bealey Avenue.
 - (v) We are unsure what the 'gallery' is. It is not included in Table 1 (Proposed Site Usage, p 6 of application). There is no indication that either the gallery or the events centre meets any identified needs of the immediate community.
- (63) **The Hub's effectiveness does not depend 'on the high level of amenity in the Residential Central City Zone'** (14.2.6.8 a ii).
- (i) Since the first meeting organised with Dr Sue and Dr Philip Bagshaw in January 2018, it has been clear that **this particular site was chosen primarily because it was less expensive** than other land closer to the CBD, and because the Anglican Care's generous rental offer made the Hub feasible long-term.
 - (ii) Being close to the city and to a bus stop also were priorities, as reflected in the notes from the 31 January 2018 meeting.
 - (iii) We were told about a site close to Latimer Square that, according to Sue and Philip Bagshaw, 'was perfect'. They were very disappointed when the offer made by the Trust was not accepted. We also understand they were interested in a site on or near Welles Street, but it was too expensive.
 - (iv) At the open meeting in October 2019, the reasons for choosing this site were repeated: they had been looking for two years, could not find a place they could afford (land less expensive here) and the site is close to the city. At this point, they added that they liked the residential feel of the area because it would provide a 'normal living environment' that would help the young people learn how to live in a community.

*Notes made at the time from both meetings are included in **Attachment 2**.*

- (v) Many of the residents attending the October meeting also remember Dr Sue Bagshaw asking us (half in jest) to let them know if anyone heard of another site or could apply pressure to the City Council or other body that might be able to help.
See, for example, submission from Michael Little. Memory of this comment also confirmed by Wendy Fergusson, Agnes White, Marjorie Manthei, Bob Manthei, Dave Kelly, Michael Prentice, Colleen Jones and Robin Jones.
- (64) **The expanded explanation in the Novo Group's application document for the choice of this location is not convincing** (paras 51 – 53, pgs 13 – 14 and para 104, p 33). We realise that the District Plan requires a strategic or operational need for non-residential activities to locate in a RCC zone (14.2.6 Non-residential activities³, a i - ii). We assume this is why the residential environment is emphasised to a greater extent in the application than what we believe was the original attraction of the particular site (*see para 63 in this statement, above*).
- (i) Regardless of whether there is or is not a strategic or operational need to locate on this site in a residential zone, the **benefits would be limited solely to the accommodation**

³ Includes reference to residential activities being the dominant activity in residential zones, while providing for community facilities. It also restricts other non-residential activities, unless there is a strategic or operational need to locate within a residential zone.

component of the Hub proposal. There would be no discernible benefit to the non-residential components.

- (ii) **We also note that the majority of submissions supporting the Youth Hub application are silent about the particular location** and/or do not even refer to what would be an appropriate site. Only six of these submissions are from people or organisations within or near the immediate area and, in some cases, are not even from within Christchurch.
- (iii) The applicant seems to suggest that the only alternatives for the Hub's location are either this *'very pleasant residential neighbourhood'* (para 53) or *'somewhere out of the way or in a neglected area or one full of abandoned buildings, bars or other negative influences'* (also para 53). There are options between these two extremes, at least two of which we understand the Youth Hub Trust initially seemed to favour (in one case, to the extent of making an offer to purchase).⁴
- (iv) It might take a while longer for the applicant to find an appropriate site, at a price they can afford. **Avoiding a delay is not a compelling reason** for the Hub to locate in a residential area, given that the most of the proposed non-residential activities already are established and operating elsewhere. Co-locating on the Salisbury Street site (rather than in a more appropriately zoned site) would, perversely, compromise the very residential qualities the applicant now considers essential: i.e., *'...plenty of greenery and a high amenity environment, and that is a great area to live...'* (para 53 in the application).
- (v) The applicant's stated advantages of being located in a Residential Central City Zone (rather than a more appropriate zone) also include *'fostering community connection ... being accepted by and being part of a community [and] ... being a valued and responsible part of a community'* (para 51, p 13). This could be achieved in a Mixed Use Zone or, in some cases, in a Business Zone as well.
- (vi) The applicant's other stated requirement—**not being near bars or other negative influences** (para 53, p 14)—is strange, given how close the proposed site is to bars with late-night trading on Victoria Street and across Bealey Avenue on Papanui Road, the casino (2.5 blocks away) and Calendar Girls (slightly further away). **These 'negative influences' presumably would compromise what the applicant says is the preferred location.**
- (vii) Finally, the **application refers to feedback from youth, 'reinforced by research'** (para 53, p 13), as part of the rationale for locating the co-services on Salisbury Street. We assume this statement relates to the research report appended to Rita Schroder's submission (on behalf of The Collaborative Trust for Research and Training in Youth Health and Development). We had not seen this research prior to writing our submission.
- (viii) **The only reference to a youth perspective in the report is on page 10 (Phase 2). A UC intern, under Dr Schroder's supervision, talked with her '15-year old cousin ... about the concept of the Youth Hub ... who said this would be a really cool idea'.** The intern's cousin said *'the focus of the hub should be 'a place where youth could go to hang out' rather than a place to go to access services'* and also specifically mentioned *'green space'* (section 3.7, p 10).

⁴ On a site near Latimer Square, mentioned during the first meeting with residents in the neighbourhood on 31/1/18.

- (65) **The above are not compelling, or in some cases even relevant, reasons for locating the Youth Hub at 109 Salisbury Street.** The VNA does not accept the applicant’s argument that there is a strategic or operational reason for locating the Youth Hub on this particular site within the Residential Central City Zone. In our view, the reason for selecting this site seems mainly to be one of cost and convenience, and does not appear to take into account the relevant provisions of the District Plan.
- (66) **The non-residential activities included in the Youth Hub’s plans will compromise the role of the Residential Central City Zone** (14.2.6.8 a iii). In particular, the RCC Zone is expected to contribute to ‘*Christchurch’s liveable city values*’, and the ‘*character, scale and intensity of non-residential activities is controlled in order to mitigate effects on the character and amenity of the inner city residential areas*’ (Table 14.2.1.1 a). The scale and nature of the non-residential components of the Hub will be clearly evident within the residential neighbourhood (in much the same way that the Salvation Army complex is), and the effects of the non-residential activities felt by those living here on a daily basis.
- (67) Allowing the Youth Hub to locate on the Salisbury Street site **does not ‘protect residential amenity by controlling the character, scale and intensity of non-residential activities’** (14.2.6.8 a v). As covered in para 60 – 62 above, the number and variety of non-residential activities proposed for this site are not small scale and will not provide a needed service to the immediate neighbourhood. Given the size of the site (and the predominance of non-residential activities), the ‘*intensity*’ must be considered significant.

Misconceptions about the Area

Residential nature of the area

- (68) The applicant describes the immediate area of the proposed Youth Hub site as including ‘*residential dwellings of a generally medium density ...*’ (e.g, para 89, p 21). However, we know that the Victoria neighbourhood has undergone significant residential intensification over recent years and is **more accurately described as ‘high density’**. This is consistent with the District Plan objective of achieving at least 50 households per hectare in the central city. See *paras 94 – 109 in particular for our discussion of this point.*
- (69) The majority of the immediate area is still **dominated by residential activities** and is clearly identified as the Residential Central City Zone (RCCZ). It spans a number of city blocks and, as explained above, is a contiguous, important and high-amenity residential area.
- (70) This is an important point because **the replacement (current) District Plan is very specific about what is and is not intended within RCCZ.** In particular,
- (i) 14.2.1.3 (Residential development in the Central City)
 - (ii) 14.2.6.1 (Residential cohesion, character and amenity)
 - (iii) 14.2.6.2 (Community activities and community facilities)
 - (iv) 14.2.6.4 (Other non-residential activities)
 - (v) 14.2.6.8 (Non-residential activities in central city residential areas)

- (71) The current District Plan specifically **encourages residential intensification** (for example, 14.6.2.11, requiring at least one dwelling for every 200m² in the central city) **and discourages non-residential activities (e.g. 14.2.6.8)**, to a much greater extent than the previous Plan did—even when taking into account the previous (‘almost sacrosanct’) L4C provision that covered most of the VNA area.
- (72) We believe the strong policy framework of the District Plan, referred to above, is the main reason why the **Youth Hub is the first resource consent application, for a primarily non-residential development in the Residential Central City Zone** near our immediate neighbourhood, that we are aware of since the replacement District Plan became operative in 2016.
- (73) This is in stark contrast to preceding years, when the previous, more liberal District Plan (especially in relation to L4A land) was in place.
- (74) Table 3 (below) provides a summary of applications (and outcomes) for the large number of non-residential activities the VNA has opposed since 1990. Note that the **only instances of non-residential activity applied for under the current District Plan** relate to temporary consents or temporary (non-consented) car parks.
- (75) **The decision made on this application, therefore, is pivotal** in determining how much protection the current District Plan will provide to residents choosing to live in a residential neighbourhood.

Table 3: Summary of VNA’s opposition to non-residential resource applications (since 1990)
Green shading = applications declined or not proceeding after objections filed

Site	Non-residential application	Outcome	Date
36 – 48 Bealey Ave & 455 Montreal St 3800m ²	Presbyterian Support Services	Consent granted, leading to loss of residential use over entire block.	March 1990
15 Beveridge St approx. 177m ²	Clothing wholesaler	Closed (opposed after business was operating in a residence without owner living on site).	June 1993
350 Durham St (corner Salisbury St)	Restaurant (to operate in a dwelling)	Consent refused.	December 1994
184 Salisbury St	Boutique hotel on L4A land	Approved with residential component, but did not proceed.	1996
118 Bealey Ave (Marli House) 2027m ²	Medical rooms on front lawn of L4A land (in a heritage protected building)	Approved with conditions, e.g. a residential component (did not proceed); lost in EQs and rebuilt as 21 apartments in 2016.	Nov 1996
344 Durham St	Counselling business on L4A land	Approved (medical rooms allowed on L4A land).	March 1997
21 Peacock St 435m ²	Motel use of flats on L4C land	Declined.	July 1997
90 Salisbury St	Bed & Breakfast accommodation on L4A land	Approved w/ residential component.	1997
37 Peacock St 365m ²	Motel expansion from Bealey Ave on L4C land	Proposal dropped after discussions with VNA.	1997
12-20 Bealey Ave (the Maisonettes) and 24-26 Dublin St	Convert houses to offices on L4C land	Declined for Dublin St. Bealey Ave component approved, but to preserve the buildings rather than protect residential land.	Oct 1999
62 Bealey Ave 607m ²	Real estate offices on L4A land	Proposal not progressed, but is now a dental practice.	June 2000

Site	Non-residential application	Outcome	Date
410 Montreal St/2 Beveridge St 137m ²	Motel use of cottage on L4A land (heritage protected cottage)	Discussed w/ owner & CCC; proposal not progressed.	February 2003
16 Gracefield Ave 546m ²	Motel building on L4A, extending over part of L4C land	Approved by CCC; VNA appealed to Environment Court and proposed use of L4C component abandoned (motel confined to L4A on Colombo St).	May 2003
42 Beveridge St 400m ²	Doctor's rooms on L4C land (owner was to live on site, but ended up being sporadic)	Approved, provided owner lived on site (seldom did); no longer used for medical practice by 2018 (sold).	February 2005
49 Gracefield Ave (corner Durham St) 348m ²	Use of house as Bed & Breakfast on L4C land	Stopped.	December 2005
451-453 Montreal St 405m ²	Car park for commercial blg on Victoria St (L4A land)	Granted, with loss of three existing dwellings.	February 2006
410 Durham St 506m ² (owned by Synagogue next door)	House demolished for synagogue to use as paid car park on L4C land	Consent application not filed; not progressed after VNA contacted CCC (now vacant section, part of synagogue).	May 2010
847-857 Colombo St, 115-123 Salisbury St & Gracefield Ave to #16 4217m ² (520m ² L4C)	<u>Original applications:</u> Salvation Army citadel, Southern Regional Office, recreation activities and Hope Centre	Approved, but with conditions (including residential use of 432m ² of the L4C component, no pedestrian or vehicle access from Gracefield Ave or Salisbury St corner); removed request for regional office & Hope Centre. Development delayed by EQs; reapplied w/ changes in 2015. Net loss of 14 existing residential units.	Nov 2011; then 2015 (building completed 2017)
23 Peacock St 253m ²	Used as counselling service, without owner living on site	Contacted CCC several times; owner said he lived on site (or would be), so no action taken by CCC. Still not living onsite.	From 2011 or before
100 Bealey Ave & 416-418 Durham St 1728m ²	Container café & carpark on residential land (heritage dwelling lost in EQs)	Temporary consent under EQ Recovery Act (extended to June 2021).	2011
52 Bealey Ave (Montreal St corner) 430m ²	Lawyers' offices set up in existing dwelling without owner living on site	Temporary consent under EQ Recovery Act. Permanent consent granted 2012 without notification.	2012
350 Montreal St (Cranmer Square) 7183m ²	Majestic Church, misc art & recreation activities on residential land	Consent declined (VNA's arguments cited as one of primary reasons).	September 2014
56-72 Salisbury St & 373 Durham St 6150m ²	Commercial car park for the Casino on residential land	Temporary consent (EQ Recovery); applied for zoning change under replacement District Plan. VNA & CCC opposed; confirmed as residential (temporary consent only, to June 2021).	February 2018
423 Durham St (Peacock St cnr)	Sign advertising 'Parkable' carpark on empty section	CCC contacted owner, confirmed no commercial carpark allowed without consent. Stopped.	Dec 2019
35 Gracefield Ave	'Parkable' sign (same owner as above)	Contacted CCC again; same action taken as above.	Mar 2020
105-107 Salisbury St & 11-22 Gracefield Ave 4518m ²	Youth Hub Trust proposal	Pending (hearing set for 29 – 30 Sept 2020)	

(76) **The summary provided above explains why the VNA continues to oppose applications that are not consistent with the District Plan.** Had we not opposed these applications—regardless of the amount of time, energy and resources required—most of the examples shaded in green

probably would have been approved. The impact of that on this neighbourhood would have been profound.

- (77) One of the first significant applications the VNA opposed in our neighbourhood was the Presbyterian Social Services complex on Bealey Avenue – Montreal Street (in what was then referred to as Residential 5 Zone). The complex replaced several dwellings, which led directly to the loss of three more when car parking for a commercial building on Victoria Street was approved (see *'The Domino Effect'*, below).
- (78) The panel approving the Presbyterian Social Services application stated in its decision (3 July 1990) that *'...the panel has reached its decision but this should not be taken as any indication of a weakening of attitude of the Council towards the importance and protection of the inner city residential zones. If such a proposal was to be promoted in, say, Beveridge Street or Gracefield Avenue, the panel would have no hesitation in declining such an application'* (p 5 of report; emphasis added).
- (79) Although approved under a different District Plan and different rules, the similarity between this example and the Youth Hub application under consideration is still valid. See *paras 133 – 135 for another example*.

'The Domino Effect'

- (80) One of the reasons for including information about previous consent applications in this statement is to confirm that the VNA has been committed to preserving residential land, regardless of the specific activity, long before the Youth Hub applied for consent.
- (81) **We know from experience how 'gaps' created by non-residential activities in residential areas affects not only immediate neighbours, but the entire neighbourhood.** Effects include:
- (i) loss of confidence in the City Council and the resource consent process to protect residential areas from non-residential intrusions;
 - (ii) erosion of what makes an area a 'neighbourhood', instead of just a collection of dwellings interspersed with offices, restaurants, motels, social services catering for the wider city (see list in Table 3, para 75 for more examples);
 - (iii) a signal to other potential applicants that even large non-residential activities (such as the Youth Hub) are likely to be approved.
- (82) **We refer to the above as the 'domino effect'**, although the District Plan terminology would be 'loss of residential cohesion'. For example, the Youth Hub application cites the Salvation Army complex's existence as a reason why the Youth Hub should be approved, even though the Salvation Army was approved under a different District Plan (and on a site that primarily zoned L4A—with more permissive rules than the L4C zone).
- (83) The sequence of events goes as follows: one application for non-residential activities is approved. The next applicant uses its existence as a reason why their application should be approved as well, claiming that the area already is compromised, so one more can't hurt. If successful, it makes the next application even easier. One falls, others follow—just like with a game of dominoes.

Zoning: Near vs within?

- (84) We also want to emphasise the **difference between living near a Mixed Use or Business zone and living within such a zone**. This difference often is overlooked (whether on purpose or not) by applicants when seeking consent for a non-residential activity in neighbourhoods such as ours.
- (85) Firstly, most of the non-residential activities near the proposed Hub site are there because of a **mixture of zoning—not a mixture of activities within a zone**. For example, the land on the corner of Colombo and Salisbury Streets (where Accent lighting is located) is zoned Central City Mixed Use, as is the rest of Colombo Street going south to Kilmore Street.
- (86) A large portion of Colombo Street going north is zoned Specific Purpose Hospital (the former Christchurch Women’s Hospital site) which, if not re-developed as a medical, hospital or other use under Rule 13.5.4.1, will revert to the underlying Central City Residential Zone. We have this site firmly in mind when referring to the ‘domino effect’ (paras 80 – 83, above).
- (87) Salisbury Street (between Colombo and Victoria Streets) is primarily residential (including the Airedale Court social housing complex), with a few sites zoned Mixed Use.
- (88) A strip on each side of Victoria Street is Central City Business, but is surrounded by Residential Central City, in both directions from Salisbury Street to Bealey Avenue.
- (89) **The existence of these other zones nearby does not alter the fact that the primary use in the immediate area of the site being considered at this hearing is residential.** *See section starting with para 94 for further discussion of this point.*
- (90) Secondly, there is a difference between ‘mixed’ use because of (i) non-residential activities that are permitted within a residential area and (ii) non-residential activities that are not anticipated, but which nevertheless obtain resource consent. **Most of the non-residential activities in or near the proposed Hub site are there because they were permitted at that time, under whichever District Plan was in place then.**
- (91) An exception is the Sheppard & Rout architects’ office at 104 Salisbury Street, which the applicant cites as an example of the area already being compromised by commercial or non-residential activities (e.g. para 11, p 1 and Appendix 8, para 3, p 1).
- (92) We would, of course, prefer this site to be residential, but the office is completely different from the proposed Youth Hub in the following important ways:
- (i) the architects’ office has maintained a completely residential appearance from its only street frontage,
 - (ii) it is small-scale and therefore has minimal impact on the surrounding residential neighbourhood,
 - (iii) its residents are not noisy or disruptive to nearby neighbours,
 - (iv) its hours of operation are normal business hours and therefore does not create noise or disturbances at night,
 - (v) it generates very little traffic or visitors to the site,

- (vi) and the southern boundary adjoins Mixed Use zoned land, therefore not depriving residents along that boundary of neighbours.
- (93) For the record, we would have objected to this commercial activity had we realised the flats (part of the complex when the architects' office shifted in) were being removed. However, as stated in Ms Jowett's report (para 38, p 17), the office operates under temporary consent. When that consent eventually terminates, we presume the site will revert to residential use.

Area 'increasingly commercial?'

- (94) The applicant also describes the proposed site as being located near an 'increasingly commercial area' (para 101, p 25). Over the years, we have lost residences on the busier streets—including residences located on streets zoned commercial, such as Victoria Street—but **almost all of the developments since the earthquakes (and, subsequently, the replacement District Plan) have been residential.**
- (95) Of even more importance, is the significant level of intensification that has occurred since 2015. The VNA conducted a 'neighbourhood property census' in July 2015, as a way of tracking what was happening in our area.
- (96) We counted (i) occupied houses/units/apartments (ii) those that were unoccupied but still standing (iii) the number that had been demolished and (iv) any being used for non-residential activities under temporary consent.
- (97) We have continued updating the census over the years. As of July 2020, there was a **net increase of over 100 potential or actual dwellings, with rumours of more at planning stage.**
- (98) **Examples of the area becoming more residential include the following,** (many of which share a boundary with the proposed Hub site or are in close proximity):
- (i) one townhouse converted into three apartments at 1/20 Gracefield Avenue, across from the proposed Hub site;
 - (ii) six apartments under construction at 27 Gracefield Avenue (replacing one dwelling); on northern boundary of Hub site;
 - (iii) two townhouses at 31 Gracefield Avenue (replacing one dwelling), also on Hub site boundary;
 - (iv) a townhouse and smaller dwelling under construction at 39 Gracefield Avenue (replacing one dwelling), on Hub site boundary;
 - (v) six apartments under construction at 41 Gracefield Avenue (replacing one dwelling), on Hub site boundary;
 - (vi) two townhouses at 43 Gracefield Avenue (replacing one dwelling), on the edge of the Hub site;
 - (vii) 103 Salisbury Street converted from an office to a dwelling; shares boundary with Hub site;
 - (viii) two townhouses at 101 Salisbury Street (replacing one dwelling), also sharing a boundary with the site;

- (ix) 50 apartments at 118 Salisbury Street (replacing approximately 15 - 16 pre-earthquakes), directly across from the Hub site;
 - (x) six townhouses at 362 Durham Street (replacing demolished apartments, after a delay of seven years), two of which are on western boundary of Hub site;
 - (xi) four other townhouses at 52 – 58 Gracefield Avenue (replacing two older houses converted into flats on Durham Street);
 - (xii) two townhouses at 368 Durham Street (replacing one dwelling);
 - (xiii) three townhouses at 391 Durham Street (replacing a commercial enterprise);
 - (xiv) three townhouses at 431 - 435 Durham Street (replacing a motel);
 - (xv) two townhouses at 372 Durham Street (replacing one dwelling converted into flats);
 - (xvi) 21 apartments at 106 Bealey Avenue;
 - (xvii) 24 apartments at 118 Bealey Avenue (replacing one large former residence converted into offices);
 - (xviii) 20 apartments at 871 Colombo Street (replacing one dwelling used for offices);
 - (xix) two townhouses at 420 – 422 Montreal Street (replacing one dwelling);
 - (xx) two townhouses at 37 Beveridge Street (replacing one dwelling).
- (99) In addition, there are several recently consented developments in the neighbourhood, including 20 apartments at 28 – 34 Gracefield Avenue (near the proposed Hub site), replacing 14 previous units.
- (100) The former Christchurch Women’s Hospital site (Colombo Street through to Durham Street) is zoned Special Purpose Hospital, reflecting its historic use. It was reconfirmed as Residential Central City during the replacement District Plan hearings, if not retained for medical/related use. **The same decision was made for the Canterbury Bowling Club site, which is why we were so disappointed when we learned about the Youth Hub proposal.**
- (101) **During the period when all these developments were taking place, not one of the sites was converted to commercial or non-residential use.** The Youth Hub application is the first one.
- (102) **The only non-residential activities** we were aware of at the time were:
- (i) people working from home—allowed under the District Plan (and maintaining the core residential component);
 - (ii) commercial activities operating under temporary consent (e.g. the container café on the Bealey Avenue – Durham Street corner and the Casino’s large carpark at 56-72 Salisbury Street and 373 Durham Street);
 - (iii) and more recently, the proliferation of unhosted Airbnb rentals (most of which are operating without the required resource consent).
- (103) The same residential intensification has occurred further away from the proposed Hub site. Although we do not have the same level of historic knowledge about these streets as we do for

our immediate neighbourhood, it is clear that **the surrounding neighbourhood—up to Madras Street—is primarily residential**. This is true even in areas zoned ‘Mixed Use’, where commercial activities could have been located. *See summary below.*

(104) **Salisbury Street**

- (i) The only non-residential activity on Salisbury Street between Colombo and Durham Streets are (i) the Salvation Army, but with two townhouses on the Gracefield Avenue boundary; a car park for Accent Lighting and The NZ School of Tourism, both facing Colombo Street and (iii) the already mentioned architects’ office at 104 Salisbury Street.
- (ii) There also is a church on the north-west corner of Salisbury and Durham Streets.
- (iii) Between Colombo and Manchester Streets, the only non-residential activities are (i) the new hotel on the south-east corner of Colombo and Salisbury Streets—which has been non-residential since at least the 1920s and (ii) a pre-school. The large purely residential retirement village (Maryville Courts) takes up most of the north side of the street and part of the west side of Manchester Street.
- (iv) The nearest truly commercial activity in this block is Briscoe’s (on Salisbury Street, between Manchester and Madras Streets) and a small business on the opposite side of Salisbury Street. The rest is residential, with some offices and a hotel near the Madras Street corner.
- (v) Similar to what has happened in our immediate neighbourhood, Salisbury Street now has more dwellings than it did pre-earthquake; for example, 32 apartments at 136 Salisbury Street, several other multi-unit developments, including a Williams Corporation one under construction (with a total of approximately 30 new apartments).

(105) The applicant refers to the ‘*mixed retail at Peterborough Street*’ (para 89, p 21 and Appendix 8, para 3, p 1). Peterborough Street actually has become more (not less) residential in the past three or four years, similar to what has happened on many streets in this area.

(106) **In summary, even the areas outside our immediate neighbourhood (and the proposed Youth Hub site) have become increasingly residential, including areas in the Mixed Use zone**, where some non-residential activities are anticipated. The earthquake recovery plan, which requires one dwelling for every 200 square metres⁵ (to achieve 50 households per hectare) is the primary reason for the significant infill and intensification.

(107) Given the neighbourhood’s proximity to the business district, and the fact that land is less expensive here than in the CBD, **it is not surprising that so many commercial and other non-residential resource consent applications have been made**. However, the District Plan gives a clear direction that such activities are not anticipated here. Those that do exist are primarily exceptions, established under the previous District Plan (e.g. churches, medical/health services and educational facilities). The VNA takes some credit for this outcome, given our vigilance since 1990 to protect the neighbourhood from non-residential intrusion (*see Table 3, para 75*).

(108) **The reason for providing the information in this section of our statement is to emphasise the fact that the area is becoming more residential, consistent with the expectations signalled in the District Plan**. If non-residential activities are allowed to take over residential land again—especially on a site as large as the proposed Youth Hub site—the residential nature could be

⁵ 14.6.2.11

eroded very quickly and would be difficult to overturn. *See also paras 80 - 83 re the 'domino effect'*)

- (109) We disagree with the statement in the Urban Design Assessment (Appendix 8) that the 'Youth Hub can be suitably absorbed into the landscape fabric given the mix of residential and to community activities existing, and nature of the area' (para 12, p 5). **The non-residential components will be too obvious, the activities too noisy and prevalent and the 2-metre fence surrounding the site too different from the norm for the Hub 'to blend into this particular urban environment'** (para 12, p 5). The loss of residential cohesion is a significant negative effect on adjoining and nearby residential properties, of which there are many. *Refer para 110 – 112 and Table 4, below).*

Number of properties/residents directly affected

Table 4: Properties directly affected

Properties referred to in the Officer's report	Additional properties that should be considered
3, 5, 7 & 9 Gracefield Avenue	2A & 2B Gracefield Avenue
27 Gracefield Avenue	16 & 16A Gracefield Avenue (<i>see photo below</i>)
31A Gracefield Avenue	1, 2 & 3/20 Gracefield Avenue (<i>see photo</i>)
35 Gracefield Avenue	24 Gracefield Avenue
39 Gracefield Avenue	28 Gracefield Avenue
41 Gracefield Avenue	43A Gracefield Avenue
49 Gracefield Avenue	45A Gracefield Avenue
3 & 6/362 Durham Street	360 Durham Street (at least one of the units)
101A Salisbury Street	96 Salisbury Street
103 Salisbury Street	99 Salisbury Street
118 Salisbury (unspecified number of apts)	Plus 25 of 50 SoHo apartments (118 Salisbury St)
Total = 15 properties	Total = 38 additional properties
Total = 53 properties on the perimeter or very near to the Youth Hub site	

- (110) **We believe the application (and other reports) under-estimate the number of properties that would be directly affected** by the non-residential activities located on the Hub site (e.g. para 27 of the Officer's report that refers to the 15 properties shown in Column 1 of our Table 4 above). The number of apartments in the SoHo complex (118 Salisbury Street) are not mentioned, but we estimate 25 of the total 50 apartments to be directly affected by the effects of the proposed Youth Hub. There are at least **38 additional properties** that also border on or are very near the proposed Hub site and should, therefore, be considered as well (included in Column 2, above).
- (111) In addition, all the residents from other properties on Gracefield Avenue are likely to experience negative effects from the traffic-related issues at the Salisbury Street end of Gracefield Avenue. **This adds another 20 properties, for a grand total of 73 properties from just the three streets: Gracefield Avenue, Durham Street and Salisbury Street.**
- (112) Residents on Gracefield Avenue all use the Salisbury Street exit, especially if travelling east (Durham Street is one-way going south). The problems we anticipate because of the large-scale components of the Hub include:
- (i) the narrowness of the street (only 3.6m wide, compared with the minimum 4.0m required), which is a safety as well as traffic issue;
 - (ii) limited visibility from the Gracefield Avenue access point, which is a safety issue for drivers, cyclists and pedestrians (does not meet Rule 7.4.3.7);

- (iii) limited on-street parking, especially on the western side of this portion of the street;
- (iv) and, even having an access point on Gracefield Avenue, which is not anticipated under Rule 7.4.3.11.



Photo taken on 1 July 2020 from balcony of 16A (rear section) Gracefield Avenue, showing proximity of residences on Gracefield Avenue and Durham Street to the proposed site

Another view, with other dwellings around the proposed site (taken from 3/362 Durham St, 2nd floor, 3 July 2020)



- (113) As explained in paras 50 - 62 in this statement, we also know that the entire neighbourhood would be affected by the presence of the Youth Hub because of its (i) scale and number of non-residential activities (ii) impact on residential amenity and (iii) effect on residential cohesion.

Management of the Youth Hub

- (114) We are concerned about the number of **young people from throughout the city who would be coming to the site**—without any commitment to the neighbourhood, and who the Youth Hub personnel would have little, if any, control over. The proposed services are to cater for youths throughout the city, not just those living on-site. The event centre activities and recreation facilities also will attract a large number of external participants—during the day, at night and on weekends. The scale of this is not an anticipated residential activity.
- (115) We have experience of what happens when numerous young people congregate in the neighbourhood (a regular occurrence when late-night bars operated on Victoria Street). Even with the best of intentions, **it is difficult to control such things as noise generated by 'boisterous youths' from outside the area, gatherings in such places as Aldred Reserve on Durham Street, pranks and other anti-social behaviour.** The VNA maintained a detailed log of such instances over a period of five years, post-earthquakes. The log provided such a clear picture of the negative impact this behaviour had on the nearby residential area that the City Council's Provisional Local Alcohol Policy restricted trading hours on Victoria Street to 1:00 am.
- (116) **The Management Plan in the Operational Statement (Appendix 4) and the additional material provided by Dr Sue Bagshaw on 9 September 2020, do not give us confidence** that the expected problems will be managed to the extent they would need to be within a residential neighbourhood. For example, the rules include (i) *'asking'* that the accommodation wing not be used for *'parties with larger groups'*; (ii) *'not allowing'* alcohol or drugs on site, but no concrete ways of managing off-site problems related to alcohol; (iii) staff and visitors will be *'encouraged'* to travel by bus, bike and scooter (para 83 of the 9/9/20 document).
- (117) The expanded Code of Conduct provided in the 9 September statement of evidence, even if it is the basis for a more explicit code, is still too minimal to give us confidence that the effects of the number of off-site clients and other visitors will be managed.
- (118) **Two other clauses in Dr Bagshaw's statement of evidence causes us concern.** Firstly, para 41 (p 7) in her statement, explaining that other organisations may be added, is covered by us in para 60 (i) above. Secondly, her para 45 goes further by asking for consent to provide *'flexibility and fluidity'* for the Youth Hub's operation and services. **This requested 'fluidity' raises alarm bells for us.** If approved, residents would have no certainty about the expected number of visitors, staff, events or agencies. The focus of the operation could change over time, probably with no consequences unless residents continuously monitor what is happening there, something we should not be expected to do.

Aspects We Are Not Opposing

- (119) **We are not arguing for or against the concept of the Youth Hub.** Some of the submitters opposing the Youth Hub on this particular site have relevant professional qualifications and/or experience (for example, Robert Manthei, Walter Logeman, Tony Tresilian and Murray Jamieson). They have their own opinions about the efficacy of the Youth Hub concept—whether positive or negative—but this is outside the scope or expertise of the VNA.

- (120) **Instead, we have approached the Youth Hub application in the same way we have for all other non-complying applications (refer Table 3, para 75).** The VNA decided many years ago that we would assess all applications against their consistency with the spirit and stated objectives, policies and rules of the District Plan, not against an assessment of the ‘worthiness’ of the applicant or activity.
- (121) **Under the RMA, the key question is not whether the proposed activity is worthwhile per se, but whether, at the given location, it would have negative effects on the environment.** We note that almost all submissions supporting the Youth Hub commented only on (i) the concept of the Hub or (ii) the virtue, intentions, ‘*great work*’ (Simon Atkinson) or ‘*evident passion*’ (Canterbury DHB) of the applicant.
- (122) **Few of these submitters commented on whether the Hub’s activities are compatible with a densely populated residential neighbourhood,** although there are some who assume the ‘*Hub will be an asset to the neighbourhood community*’ (Maree Andrews, Norwich Street) or ‘*will benefit the local community*’ (Daryle Deering, Rutherglen Avenue). It is unclear how familiar these submitters are with this neighbourhood, the specific site or the District Plan.
- (123) **This is in stark contrast to submissions made by those who live and/or own property in the immediate area.** These submissions include specific details about the site, the relevant District Plan provisions and the negative effects anticipated if the Youth Hub is located on this site.
- (124) It is our understanding that there is no basis in the resource consent process for judging an application according to the virtue or good intentions of the applicant. This is, firstly, because the effects of an activity are the same, regardless of virtue or intentions. Unacceptable and negative effects on residential amenity are the same, regardless of the ‘worthiness’ of the activities or development.
- (125) Secondly, virtue and good intentions are in the eye of the beholder and are therefore more difficult to quantify than the objectives and policies that form the foundation of the resource consent rules.
- (126) And, finally, there is the **issue of a ‘consented environment’** itself. If consent is granted for this application, and the applicant later decides to vacate or sell the property, or other ‘community’ organisation/s (possibly ‘less virtuous’ ones) seek consent, they can use the presence of a consented, non-residential environment under the current consent for their case. This is similar to the ‘domino effect’ discussed in paras 80 – 83, above.
- (127) For all these reasons, we expect the Youth Hub application to be **judged on its consistency with the current District Plan.** Specifically, we expect that (i) vacant sites would be redeveloped for residential purposes (ii) inner-city residential amenity and character would be protected (iii) the anticipated limits on the scale of non-residential activities would be enforced and (iv) the likely negative effects (of doing otherwise) on a close-knit, densely populated residential neighbourhood would be recognised.
- (128) **Any attempt to dismantle the Hub’s vision, in order to obtain resource consent, would compromise what the applicant says are essential to the effectiveness of the Hub concept.**
- (129) According to the application, this vision includes:
- (i) some young people living on site;
 - (ii) ‘wrap-round’ services and live-in supervisors, for safety and compliance purposes;

- (iii) all the services located on site being accessible to youths in the Canterbury region;
- (iv) training opportunities built in (e.g. café and market garden) and
- (v) recreational activities available on site or nearby.

<h2>Summary</h2>

- (130) **For the reasons outlined above, the Victoria Neighbourhood Association opposes the Youth Hub application in its entirety.** It is our understanding that, taken as a whole, the proposed Youth Hub is a non-complying activity within the Residential Central City zone. Therefore, all effects need to be considered (in our view, more than minor in their effects), and those effects must not be contrary to/inconsistent with the objectives, policies and rules in the District Plan.
- (131) Individual VNA submitters, including members of the Salisbury West Community Preservation Group, have described what the neighbourhood means to them, how they live and work here, why they shifted here in the first place and/or why they have stayed so long. They also have described what they think the likely negative effects will be if the Youth Hub locates on this particular site, within this residential neighbourhood.
- (132) The Youth Hub application is for a primarily non-residential development on a large site in the Residential Central City Zone. **It is the first major test of how effectively the new District Plan can provide protection of residential amenity and cohesion in the RCC zone.** We think it is very important to consider the long-term effects, if consent is granted.
- (133) Although considered under the previous District Plan's rules, the Officer's report (dated 25 October 2010) assessing the Salvation Army application (RMA 92016339) concluded that *'.....collectively these activities [church, offices, commercial activities, social services] will result in a level of non-residential activity and associated effects in terms of visitors to the site and staff presence that is well beyond that which could reasonably be expected to be established on this site'* [para 109, emphasis added].
- (134) The Officer also stated that *'The proposal will in my view have more than minor effects on the overall character and amenity and is considered to exceed the scale of effects that would normally be anticipated from a community facility serving a local need'* (para 123, emphasis added).
- (135) We have quoted the above because (i) the site is directly across from the proposed site for the Youth Hub (ii) at 4217m², it is similar in size to 109 Salisbury Street and (iii) we believe the Officer's conclusions describe the effects we anticipate if the Youth Hub application is approved.
- (136) **We cannot overstate the importance of keeping this area residential.** It is too small to handle 'gaps' created by non-residential activities. Having to continuously monitor and oppose applications for non-residential activities demands not only commitment, but time and resources as well. We should not be required to this—the District Plan and resource consent process should offer more certainty.
- (137) If we are not vigilant, the area we have chosen to live in—with the understanding that it would be protected by its zoning—will no longer be the safe, sociable, enjoyable place it now is.

- (138) **The question is: ‘If consent is granted for this application, what would ever be refused?’** We believe that consent would give a strong signal that all future applicants have to do to obtain consent is to include a minor residential component in what is otherwise a non-residential activity. A proliferation of such applications would be harmful to adjoining residents and to the entire RCCZ. Consent would also undermine one of the District Plan’s main objectives of increasing the number of residents living within the Four Avenues.
- (139) **The VNA requests that the Youth Hub application be declined in its entirety.**

Endorsement of this Statement by the VNA Committee

This statement was endorsed by the Victoria Neighbourhood Association Committee on Monday 14 September 2020. The Committee also agreed that Marjorie Manthei and Dave Kelly would present the statement on behalf of the VNA at the resource consent hearing.

Louise Edwards (Chair)

Sue Allard

Amy Bennetts

Sheila Hailstone

Dave Kelly

Bill Luff

Marjorie Manthei

Bob Manthei

Lindsay Martin

Marg McEvedy

Heather McVicar

Wendy White

Axel Wilke

Michael Gorman (abstaining from discussion and endorsement of the VNA submission)

See Attachments on the following pages:

- 1) *Excerpts from the VNA Rules*
- 2) *Notes from two meetings with Youth Hub Trust representatives (confirmed by Dr Sue Bagshaw for accuracy before distribution)*
- 3) *Summary of results from VNA consultation re the Youth Hub proposal*

ATTACHMENT 1: Excerpts from the VNA Inc Rules (amended version, 14 June 2015)

2. Name of Society: Victoria Neighbourhood Association Incorporated (the 'Society').

3. Objectives of the Society

3.1 Promote appropriate and sustainable management and development of the community known as the 'Victoria' area, having regard to ecological, environmental, historical, cultural, safety, roading and community values.

Location: Bealey Avenue [southern side of street only], Victoria Street [eastern side only], Salisbury Street [northern side only] and Colombo Street [western side only]. The 'Victoria' area includes the above boundary streets, plus Montreal, Peacock, Beveridge, Conference and Durham Streets; Gracefield Avenue and Airedale Place, within the stated boundaries.

3.2 Initiate and/or support activities that foster, enhance and/or protect the residential amenity, cohesion and quality of life within the 'Victoria' community.

3.3 Monitor and inform the local community of any proposed projects or schemes that may impact on the local amenities and/or the community's ecological, environmental, historical, cultural, safety, roading or community values.

3.4 Act as advocate for the local area / community, including taking any action that members consider necessary to protect the residential amenity, zoning and/or other interests of the local community.

3.5 Involve ratepayers, residents and businesses of the local community and surrounding area in projects and activities relevant to or affecting the 'Victoria' area and to raise awareness of issues affecting the Society or the local community.

3.6 Subscribe to, become a member of and/or co-operate with any other organisation, whether incorporated or not, whose objectives are compatible with those of the Society.

4. Coordinating Committee [most relevant clauses]

4.1 The affairs of the Society shall be managed by a coordinating committee ['the Committee'], elected at an Annual General Meeting, and including at least the following officers:

- Convenor + Chair [may be combined into one office]
 - Secretary
 - Treasurer
 - Membership Coordinator
 - One or more Street Coordinators, each with responsibility for designated street/s within the 'Victoria' area
- And between two and fifteen (2 – 15) other members.

5. Membership of the Society

5.1 Eligibility for Membership

The following are eligible to apply for membership of the Society:

5.1.1 Those who support the objectives of the Society as set out in Rule 2 **and**

- (a) Live in or own residential property in the 'Victoria' area, as defined in clause 2.1 **or**
- (b) Have another specified interest in the area.

5.1.2 An incorporated organisation or other business operating in the 'Victoria' area, whose function or services are consistent with and/or support the objectives of the Society.

5.2 Admission to Membership

5.2.1 The Committee or other members may approach any individual, business and/or incorporated organisation and invite them to apply for membership of the Society.

5.2.2 Any individual, business or incorporated organisation who wishes to apply for membership may approach a Committee member and request consideration.

5.2.3 Applicants for membership shall complete any application form, pay any subscription or joining fee and supply such information as requested by the Committee.

5.2.4 The Committee shall be responsible for deciding who may be admitted as a member in accordance with any policies of the Society, and shall not be required to give reasons for approving or not approving any application. The Committee's decision shall be final.

- 5.2.5 Children aged 10 – 17 years can be admitted to the Society as part of a 'household membership subscription' (refer clause 8.1) and will be designated as Junior Members in the Society's membership records. Junior Members are not eligible for election to the Committee or as an Officer of the Society, but have the same voting rights at General Meetings as other members.

6. Membership rights and responsibilities

- 6.1 All members (and Committee / sub-committee members) shall promote the interests and the objectives of the Society and shall do nothing to bring the Society into disrepute.
- 6.2 Anyone who is eligible for membership as set out in clause 5.1 can attend General Meetings of the Society, but only financial members are entitled to participate in decision making at those meetings. Any financial member in attendance at meetings shall be entitled to one vote.
- 6.3 All members shall be required to keep confidential any matters discussed at any Committee, General, or other meeting of the Society.
- 6.4 No member shall speak for or on behalf of the Society without the prior consent of a quorum of the Committee of the Society.
- 6.5. Any member is free to express their personal view publicly.

8. Subscriptions and Levies

- 8.1 The membership joining fee, annual subscription, and any other subscription or levy shall be set by resolution of a General Meeting. Differential membership fees and subscriptions can be set for 'individuals' (one person) or 'households' (more than one person living at the same residence); once admitted to the Society, however, each member is covered by the same Rules and has the same rights and responsibilities, regardless of membership category.

10. Committee Meetings *[most relevant clauses]*

- 10.1 Subject to these Rules, statute and/or resolution of any General Meeting, the coordinating committee may exercise all the Society's powers necessary to make decisions on behalf of the Society, and to direct and manage the affairs of the Society and (10.2) shall be binding on all members.
- 10.4 Any financial member of the Society may attend Committee meetings, except as otherwise decided by the Committee, but only the elected Committee members are entitled to vote.
- 10.6 Five members of the Committee shall constitute a quorum. If a quorum is not reached, those present can decide to
- 10.6.1 Cancel the meeting and reconvene at a later date, or
- 10.6.2 Discuss any or all of the agenda items, record any interim decisions and adjourn the meeting to canvas opinions of other Committee members, at which time interim decisions may be ratified.
- 10.6.3 Complete any business related to previous meeting/s held with a quorum.
- 10.8 Those present at a Committee meeting may decide that opinions from absent members or other members of the Society should be canvassed before making a final decision on one or more agenda items. In this case, the chairperson shall adjourn the meeting until a designated date, at which time decisions may be made or interim decisions ratified.

ATTACHMENT 2: Notes from two meetings with Youth Hub Trust representatives

Notes from meeting with Sue & Philip Bagshaw re plans for Bowling Club land (Wed 31/1/18, 7:00pm, 50 Gracefield Ave)

Present: Wendy + Ian White (new owners, 49A Gracefield Ave), Michael Prentice (owner, 101 Salisbury St), Murray Jamieson (99 Salisbury St), Murray + Tania Gorton (new owners, 41 Gracefield), Graham + Agnes White (2/20 Gracefield), Darral Campbell (27 Gracefield), Alison + Mike Kyne (16 Gracefield), David Sheppard (Sheppard + Rout Architects, 104 Salisbury St), Bob + Marjorie Manthei (50 Gracefield).

Apologies: Walter Logeman (5 Gracefield)

Added to group since the meeting: Diane Ammar (16A Gracefield), Barry Parker (developer), Ange Barclay (362 Durham)

Background to meeting

- 1 When the neighbourhood heard the Canterbury Bowling Club land (4456 m² at 105 Salisbury St, backing onto Gracefield Ave) had been sold, Marjorie contacted the CCC for information. Response below.

6/12/17

Hi Marjorie

I have had a look at the property file for the bowling club site and Council have not received any recent applications for development or subdivision. The last application was received in 2013 for temporary activity on the site. The site is zoned Residential Central City so the Plan permits and anticipates residential development on the site. You may wish to contact the duty planner in a few weeks/months (DutyPlanner@ccc.govt.nz or 941 8999) to get an update on any proposed development for the site.
Kind regards,

Danielle Yeoman
Planner

Resource Consents Unit

DDI: 03 941 8331

- 2 On 19 Jan, Sue Bradshaw contacted Marjorie, with brief description of what a group she represents is planning for the recently purchased Canterbury Bowling Club land (105 Salisbury St, backing onto Gracefield Ave). Confirmed Anglican Care is now the owner. She wanted to talk through their plans so residents knew what was happening before any media releases and could be involved from early stages if interested.
- 3 Plans include 'wrap around' social services for adolescents, including supervised accommodation for up to 20 in need of temporary housing. If land zoned Residential CC (now confirmed that it is), Marjorie explained the Victoria Neighbourhood Association's long-standing policy of opposing any non-residential use of residential land. She suggested the initial fact-finding meeting be expanded to those most affected (properties around perimeter of the site), rather than meeting only with her or calling a VNA meeting. Those listed above were contacted re the meeting.
- 4 In preparation, Marjorie contacted John Meeker (Senior Planner, CCC) on 24/1, who was on leave until 1/2/18. He already had been invited to attend the next VNA meeting, so can discuss questions re this proposal then. *See email correspondence on last page.*

Notes from meeting

- 5 Sue and Philip Bradshaw attended meeting. Both very experienced medical / social service providers (e.g. Charity Hospital, 298 Youth Health). Sue described the plan as a One- Stop Shop to meet needs of adolescents aged 16-25. Based on Covenant House in USA. Will have a mental health focus, linking education, training, employment opportunities, medical care and the accommodation for up to 20 youths.

- 6 Accommodation will have 24/7 supervision, with Methodist Mission acting as landlords. Maximum # = 20 at any one time; likely stay 3 – 18 months. Will have strict rules re drinking, drugs, hours etc. A formal code of conduct to be developed by those living there.
- 7 Land to be leased from Anglican Care, hopefully for period of 50 years to give stability. Lease still to be negotiated, but commitment from Anglican Care in place.
- 8 A group of agencies involved, primarily Youth Line and 298 Youth Health. Sue described the approach as bringing together a jig-saw puzzle to provide wrap-around services, a more effective way to meet needs of young people. Wants the service to be free, so will be fund raising.
- 9 Anticipates 50 – 100 clients per day (plus those living on site).
- 10 Will have a 'co-design' committee to work with Andrew Just (Field Architects). Still very early days, so only a very preliminary concept plan done. Sue picturing a 'village' design, with 2 and 3 storey (separate) buildings, but acknowledged this is more expensive than fewer, larger buildings. Will keep the current car-park on Salisbury St, which will be the only entrance. Also mentioned a small cafe on site to provide work experience and a community garden.
- 11 Timeframe at least 3 years to complete the plans, fund raising etc. Sue invited residents' participation, including membership on the 'co-design' committee if interested. They have not presented anything to the CCC yet (so no consent application lodged).
- 12 Asked why this location was chosen, given that it is zoned Residential. Wanted to be in the central city, on or close to bus route and affordable. Have been looking for 3 years (with some assistance from CCC). Found some good sites, but owners unable or unwilling to sell.
- 13 Also asked how those living on the site would be selected. Sue said 3 main groups: (i) those experiencing problems living at home for various reasons (ii) those transitioning from state care, but not ready to go out on own yet and (iii) those 'thrown out' of their family home. Young people with drug / alcohol dependency problems would be referred to specialist care, not to this facility in the first instance.
- 14 Concerns we raised included: (i) intoxicated young people on the street / in neighbourhood, given proximity of Victoria St bars and problems we're already experiencing (ii) the number of young people anticipated that will use the services or live on site (iii) loss of residential land, given that most of the activities described are 'social services' (iv) even the residential component is not 'residential' in the sense of having long-term neighbours committed to the area (v) 'domino effect' that we've experienced before, that results in other applications for non-residential use, citing other approvals as precedents and (vi) the densely populated nature of our neighbourhood, which means all properties around the perimeter of the site are very close.

Sue and Philip were thanked for contacting us before concrete plans are in place and for meeting with us tonight. This portion of the meeting ended about 8:30pm.

Notes from follow-on meeting of residents, along with correspondence mentioned above, follow.

Marjorie Manthei 2 Feb 2018

Notes checked for accuracy by Sue Bradshaw on 9/2/18

**Notes from Youth Hub Trust viewing of proposed plans (12/10/19 on the former Bowling Club site)
Written by Marjorie Manthei and checked for accuracy by Sue Bagshaw before distribution**

25-30 people attended (7-8 from the Trust or architects/planners working with them)

Visuals of the plans were available (Michael Prentice photographed them, which will be attached to final version of the notes)

Sue addressed the group, giving background to the project and describing the kind of activities that will take place on site. There was then time for questions, followed by informal Q&A in smaller groups.

Main points from Sue's address:

- Impetus for the project: (i) impact of EQ on young people (ii) wanting to help combat hopelessness and high suicide rate (iii) providing services all in one place—co-location would make it much easier for youth to access
- Overall design of the development includes (i) a 'greeting house' as the entrance (Salisbury St) which would be attractive to young people and fit w/ the surroundings (ii) an Events Centre (iii) a large market garden—takes up most of the space on the north-west part of the site (iv) accommodation for 21 young people facing Gracefield Ave—a 3 storey building made to look like different terrace-house styles, each with common living/kitchen area and (v) a car park at the back, near the health centre, and another one at the front (near the organic vegetable garden on Salisbury St.
- On site accommodation for young people aged 16 – 24, including those transitioning out of State care or w/ temporary accommodation needs etc. To live there, they have to be looking for work or in training. The plans are based on the Foyer model in the UK, as well as a similar model called Covenant House in the US.
- Estimated number of young people catered for during the day = 100 - 200 (not all at same time)
- Planned activities include: dances, drama, conferences, other creative arts activities, recreation such as basketball, a café for training purposes & sales, therapeutic services (for those on site, as well as others via the agencies that are part of the Trust).
- All activities to stop by 10:00pm. Some activities (e.g. basketball on one of the rooftops only during the day). Access is through the Greeting House, not from the street.
- Resource consent application to be filed 'soon'. Invited us to make suggestions and/or write comments on the board which they would use as part of their application.

Questions:

- 1) The concept itself is very good, but it's the wrong location. Why here, in what is a residential area? Had they looked elsewhere? **Answer:** Looked for 2 years and could not find a place they could afford. Land here is less expensive than in the CBD itself, but the site is still close to the city. Also like the 'residential feel' of the area. They like being in a residential neighbourhood because it's a 'normal living environment'. One of the main goals is for the young people to learn how to live in a community.
- 2) How do they plan to manage what will obviously be noise / other disruptions (given how close the site is to current dwellings)? **Answer:** Architect and resource consent planner said this has been taken into consideration. Mitigation via (i) access to some activities is only from the inside of buildings (ii) building materials & acoustics to limit noise (iii) Hall is fully sound-proofed (iv) layout of site done intentionally to reduce disruption, e.g. housing on Gracefield, Hall on Salisbury, market garden on boundaries where most of the current houses are.
- 3) What happens in the future when they might want to expand? **Answer:** They have a 'hub & spoke' concept, with long-term plans for similar set-ups (probably without accommodation) in other locations. Do not plan to expand activities here because their research indicates that smaller projects like this one work better.

- 4) How many workers on site? **Answer:** Full-time caretaker in one of the houses on Gracefield Ave; social worker on each floor of the accommodation.
- 5) Comment made by one of those attending: Need to think of this as a way of 'building communities', not being divisive (residential vs non-residential). Could be a very good addition to our community, including the market garden which everyone can enjoy.
- 6) Have they thought of using part of the site for 'actual residents' (e.g. not part of the Hub)—either rented or sold? Might make the proposal more palatable for VNA/other residents? **Answer:** That was looked at (on Salisbury St), but doesn't fit with the overall concept. In later informal discussion, Trust members confirmed that it would alter the whole look & feel of what they're trying to achieve; plus not enough space. The market garden (which is very large) is key to the whole philosophy, so do not want to decrease the size.
- 7) Also in informal discussion. Sue indicated that they would want VNA and SWCPG reps on the organizing committee if the application is approved—this is the committee that reps from all agencies involved in the Hub are on, so is where residential reps could have the most impact and could raise any concerns.
- 8) Discussion with resource consent planner confirmed that (i) market gardens are permitted activities in residential areas (ii) the accommodation buildings meet all rules, so departures needed (he's going to double-check that) (iii) most of the planned activities also are permitted. Latter needs to be checked as well. Resource consent is required because all developments with three or more units now require consent. Also said the type of accommodation fits w/ the current District Plan. Marjorie agreed to check this, though.

Notes checked for accuracy by Sue Bagshaw (13/10/19)

Attached to these notes is a copy of the VNA letter sent to the CCC Duty Planner requesting that any application submitted by the Youth Hub Trust for use of the former Bowling Club site be handled as a 'notified' process (refer VNA meeting held on 14/10/19).

ATTACHMENT 3: SUMMARY OF CONSULTATION WITH VNA MEMBERS

We consulted with all available VNA members (initially including those who joined the Salisbury West Community Protection Group) to ensure we were accurately representing members' opinions related to the Youth Hub resource consent application.

Results of our consultation are summarised below.

Table 5: VNA Consultation Summary (Youth Hub application)

	Total VNA Members	VNA (minus SWCPG members)
# members during consultation	137	104
# available for consultation	119 (87% of total membership)	86 (83% of the total)
No reply	10 (8% of those consulted)	9 (11% of those consulted)
Oppose Hub application	97 (82% of those consulted)	64 (74% of those consulted)
Support Hub concept	10 (8% of those consulted)	10 (12% of those consulted)
Ambivalent about Hub	3 (2% of those consulted)	3 (3% of those consulted)