

Details of submitter No: 1001 - Kerstin Rupp

Submitter:	Kerstin Rupp
Submitter Address:	

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 23/04/2023

First name: Kerstin

Last name: Rupp

Postal address:


Email:

Daytime Phone:

Would you like to present your submission in person at a hearing?

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Attached Documents

Name	
PC13 and PC14 Submission	

Submission to: Christchurch City Council

Subject: Heritage Plan Change (PC13 & PC14)

By: Kerstin Rupp

Date: 22/04/2023



Outcome sought: This submission asks the Christchurch City Council to re-confirm the amendment passed at its meeting on 13th September 2022, that the special heritage area of Chester Street East is inclusive of the whole of Chester Street East.

Reasoning:

Chester Street East is a very vibrant, friendly, tree-lined street with a great sense of community. This community also includes Dawson Street and is centred around Chesterfields Park. This is one community and should be continued to be treated like one. Excluding the eastern end of Chester Street East from the proposed Residential Heritage Area threatens the community spirit of the area and has the potential to create severance between the differently treated areas. Treating the areas the same would embrace the uniqueness and special character of the whole street and avoid potential issues in the future such as parking and excessive traffic volumes which would negatively impact the heritage area too.

Chester Street East and Dawson Street are a great example how inner-city living can be done well by having an engaging, safe and caring community which should be the goal for inner-city living. Creating a division and treating the neighbourhood differently will surely cause friction which should not be the desired intention for inner-city living. The Chester/Dawson area is a beautiful and tranquil place with a beating heart that is Chesterfields that allows for a pleasant way of living between the hustle and bustle of the inner city and a real sense of community and belonging.

I therefore ask within this submission that the Christchurch City Council reaffirms the amendment passed at the meeting dated 13 September 2022 that includes the whole of Chester Street East (until Fitzgerald Avenue) and Dawson Street to be part of the special heritage area.

Details of submitter No: 1002 - Keith and Helen Paterson and Verity

Submitter:	Keith and Helen Paterson and Verity
Submitter Address:	

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 30/04/2023

First name: Keith

Last name: Paterson

Postal address:

Email:

Daytime Phone:

Would you like to present your submission in person at a hearing?

Yes

Additional requirements for hearing:

Attached Documents

Name
CCCSubmission-Chester Street East Heritage Plan Change

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 01/05/2023

First name: Keith

Last name: Paterson

Postal address:

Email:


Daytime Phone:

Would you like to present your submission in person at a hearing?

Yes

Additional requirements for hearing:

Attached Documents

Name	
Chester St East Shared Boundary	

SUBMISSION TO: The Christchurch City Council

ON: Heritage Plan Change

BY: Keith Paterson & Helen Verity– Owners in and Residents of Chester Street East

CONTACT: [REDACTED]

1. SUMMARY OF OUR SUBMISSION

This submission asks that The Christchurch City Council reaffirm the amendment that it passed at its meeting on 13 September, 2022: that the special heritage and character of Chester Street East include the *whole* of Chester Street East not merely $\frac{3}{4}$ of the street.

We strongly support the positive intention of The Christchurch City Council to preserve and enhance areas of special heritage and character whilst encouraging increased inner-city living.

Over a period of half a century, The Christchurch City Council has, in creative partnership with local residents in Chester Street East and Dawson Street, established a unique, treelined, densely-populated, inner-city residential area. Not including the *whole* street would severely threaten the nature of the street and its cohesion.



Above: The green line includes the area proposed by the residents of Chester Street East to be recognised as a special heritage area in our city, with Chesterfields Park located at its heart. This was moved as an amendment by Councillor Jake McLellan on 13 September 2022 and passed by The Christchurch City Council. After passing this amendment, the Council voted against implementing the Government's intensification policy in which this amendment was contained.

2. HISTORICAL BACKGROUND

Chester Street East is as wide a street as its neighbouring Kilmore Street (and other inner-city streets). But from the 1980s, the Christchurch City Council began a visionary narrowing and beautification of this street (in the Western half – Madras to Barbadoes Streets – with 2 road humps, 2 curves, and a splitter island; in the Eastern half – Barbadoes Street to Fitzgerald Avenue – with 5 road humps and build-outs as pinch points). Powerlines were removed. Trees were planted on the footpaths on both sides of the street. Dawson Street was included in the beautification by the addition of permanent planter features.



The Eastern half of Chester Street East prior to CCC development in the 1980's



The Eastern half of Chester Street East in 2022 – post CCC development

Historically, this area is in the planned city park which was to have gone all the way around the central city. It retains this park-like feel. In the quakes, some trees were lost at the North-East corner, and it is our understanding that the intention is that they be replaced – the plots for each of these trees still exist, awaiting replanting, in the footpath.

From the mid 19th Century, cottages and other dwellings were established in this area. Dwellings have continued to be built up to the present.

The street was bookended in the West by the grand houses starting at 86 Chester Street East. At the East, the Fitzgerald Avenue end, the bookend was, until the quakes, the Crighton Cobbers Youth & Community Club buildings (connected to Ward's Brewery). We look forward to a building on this North-East corner which connects to this history in the manner that Flow Wellbeing Centre (229 Fitzgerald Avenue) has shown is possible.

Already, as part of acknowledging the full street's special character, in the Eastern quarter of the street, there is the wonderful refurbishment of the 7 historic units at 173 Chester Street East which sit adjacent to an 1880s cottage, and so on.

In the 2010s, The Christchurch City Council was again visionary in developing the Chesterfields Community Garden (160 Chester St East). This garden now forms the heart of the street and its strong sense of community.



The Christchurch City Council recognised the whole street as the Chester East neighbourhood (<https://ccc.govt.nz/culture-and-community/central-city-christchurch/live-here/our-central-neighbourhoods/chester-east-neighbourhood>).

The special character of this *whole* street is of a 1980s inner-city-renewal, traffic- calmed, tree-lined street. There were plans to apply such renewal to other inner-city streets also – they were never implemented. As such, individual dwellings, from the second half of the 19th Century through to the present day, can be seen to be defining and contributory dwellings.

There is no other street like this in the inner city, within the boundary of the four avenues. Dawson Street shares in this described sense of this neighbourhood; it is to be noted that all the trees on Dawson Street are on private property. The distinguishing character of Dawson Street is in reflecting the sense of the integrity of Chester Street East.

3. ONGOING DEVELOPMENT

The Christchurch City Council meeting of 13 September, 2022, passed the amendment to extend the Chester St East/Dawson St heritage area to include all properties with a Chester St East address but then the Council voted against the Plan as a whole in which this amendment occurred. This leaves the nature of Chester Street East in the current consultation process. We seek that the amendment that was passed by The Council in 2022 be included in the final Plan currently being consulted about.

Arguments against including the whole of the street include a percentage-of-historic-dwelling-calculation system that counts the seven historic units at 173 only as “one” building, and states that “because it has been partly rebuilt, its heritage values are compromised” (by such non-Christchurch logic the Cathedral in the Square, and in fact every building in Christchurch, has its heritage value compromised). The consultant did not realise that historically these units were mixed-use commercial and residential, claiming that they are simply “a non-residential building converted to residential use”. Since the Council’s September 2022 decision, which left our street in limbo, in the Eastern quarter of Chester Street East being discussed, two dwellings over 100 years old have been demolished, and two further dwellings over 100 years old are intended to be demolished. So, the calculating system has become a self-fulfilling prophecy: the percentage of older dwellings is dropping because the high threshold was not reached by underestimating both the numbers and the historical nature of the dwellings currently there.

Excluding the Eastern quarter of Chester Street East from the proposed Residential Heritage Area threatens the cohesion of the area, relegates Chesterfields to the edge of the community rather than being its heart, disconnects this area from its natural relationship with Fitzgerald Avenue and the neighbouring Englefield/Avonville RHA. Separating the nature of the Eastern quarter of Chester Street East from the rest of the street threatens to undermine the uniqueness of the whole street with issues of excess traffic flow, parking, and other problems.

Formal acknowledgment, in the manner we have advocated, of the special character of the *whole* of Chester Street East would have it as connecting Te Papa Ōtākaro/Avon River Park and City Promenade on its West end with the tree-lined Fitzgerald Avenue on its East end, and from there into the Red Zone in the North and associating it with the next Residential Heritage Area beginning at Elm Grove and going through into Beverley Park. Such a recognition of Chester Street East as a whole by The Christchurch City Council continues the visionary planning of the Council in 2022, previous years and decades, and builds on the passion of and partnership with the local residents, and continues the encouragement of the residents and owners in this partnership of enhancing the special character and also the green nature of this part of our City.

This submission is not about discouraging inner city living – quite the opposite: the neighbourhood of the whole of Chester Street East and Dawson Street, centring on Chesterfields (rather than seeing that park as being on the edge of the neighbourhood) is an excellent example of the benefits and sense of community of inner city living. **The City Council’s decision to include the whole of Chester Street East in preserving and enhancing areas of special heritage and character will leave a legacy for current and future generations to flourish in our city.**

Date of this submission: 28 April, 2023

SUBMISSION TO: The Christchurch City Council

ON: Draft Heritage Plan Change 13

REGARDING: Restricted Discretionary Design Rule for properties sharing a boundary with a Residential Heritage Area.

BY: Keith Paterson and Helen Verity

CONTACT: [REDACTED]

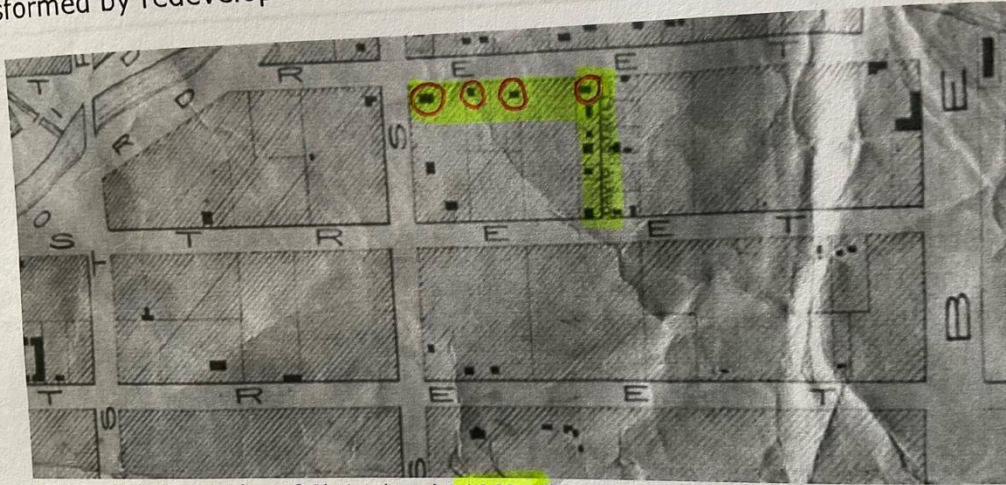
While we appreciate the intent to recognise the substantial responsibility and potential economic detriment that owning a defining property in the proposed Chester St/Dawson St RHA will bring, we strongly propose that the Discretionary Design rule for sites sharing a boundary **DOES NOT GO FAR ENOUGH** to ensure the protection of this vitally important Heritage area.

As per our original submission we believe that the section of Kilmore St west of Dawson St to Barbadoes St should also be included in the Chester St/ Dawson Lane RHA. The inclusion of these properties with significant historical, architectural and contextual values would also help provide the buffer that is so vital to the protection of the grouping of defining houses on Chester St East.

POINTS TO SUPPORT INCLUSION OF Numbers 230 -250 Kilmore St and 362 Barbadoes St.

1. The close proximity of these dwellings to a site of great importance to Ngai Tahu, the kainga of Otautahi. All references to the location of the kainga nohoanga place it at the junction of the now-disappeared Frees Creek and the Otakaro, or St Mary's Creek and the Otakaro. This identifies its site to be near Kilmore St close to the present-day Christchurch Fire Station. Archaeological values may arise from the area on Kilmore St that we believe should be included due to its proximity of Otautahi.
2. In 1858 the parcel of land bounded by Kilmore Street, Barbadoes St, Chester St East and Fitzgerald Ave was offered for sale by the provincial government. This block included Town Reserve 170, on which Dawson St was subsequently developed. By 1862 when CE Fooks mapped the city Dawson St was already well developed as too was the section of Kilmore St from Dawson to Barbadoes St. Chester St East development followed in the subsequent decades. The block in question would appear to contain at least 4 dwellings that were built prior to 1862 as per the below map.
3. The craftsmanship of the dwellings that front onto Kilmore St in this important historical block are very good examples of the period in which they were built. There are a number of houses that are equivalent to, or perhaps better examples of the periods they represent, than the defining houses identified on Chester St East. Of the 8 houses that have frontages onto Kilmore St, at least 5 of them belong to the same period of construction. These

gh there are six vacant lots within the area, five of which are showing the 2011 Canterbury earthquakes, the area retains a good level of integrity and nticity. The intimate scale and character of Dawson Street is particularly notable in arison to the small inner-city streets north of Salisbury Street, which have largely transformed by redevelopment and intensification over the last ten years.



etail from CE Fooks' survey plan of Christchurch, 1862; showing the development of Dawson Street (then David) by this time. CCLMaps 212667.

story of Subdivision and Development:

though Ōtautahi is the general Māori name used nowadays for Christchurch, it ecifically a kōhanga reo. The houses are bookended by 250 Kilmore St and 362 Barbadoes St which are competent examples of their periods.

We appreciate that the process to assess the proposed properties would need to be undertaken in line with the guidelines for qualifying to be added to the Chester St East/Dawson St RHA.

In the interim we would like to see the currently proposed approach to providing a transition zone between High Density Residential and the properties in this RHA be significantly tightened. We do not believe that the current limited number of matters of discretion that the properties sharing a boundary will be subjected to will sufficiently protect the defining houses and their settings in this RHA.

POINTS TO SUPPORT THE INCLUSION OF ADDITIONAL MATTERS OF DISCRETION and AUTOMATIC NOTIFICATION OF NEIGHBOURING PROPERTIES

1. By only requiring a potential developer to develop a contextual design which subjectively balances each of the bulk and location attributes, form and materials to respond to the adjoining RHA and limit visual impact on it, we believe, does not give the owners of the properties that share a boundary the necessary assurance that the protection of the heritage setting of their houses will be safe guarded.
2. Although the shared boundary properties will be subject to a restricted discretionary activity consent .. it will only be in regards to a limited number of matters of discretion. The effect of the proposed building on the heritage values of the sites and the whether the building would visually dominate sites within the RHA are very vague and open to interpretation by the council consent planners and heritage specialists.
3. To focus primarily on the visual impact on the properties in the RHA we believe is too narrow. A high density development on the North boundary of many of these sites could lead to permanent shade zones resulting in the significant compromise to the defining

properties and their settings that the RHA seeks to protect. In addition to shade zones it would be important to consider other effects such as the possibility of wind tunnels, the impact on the water table if significant below ground work is required, the impact of traffic intensity and parking etc.

4. We strongly request that the process requires affected property owners who share a boundary with any development proposal requiring a resource consent within the buffer zone to be consulted. The proposed restricted discretionary activity consent means that developers are not constrained by bulk and location rules. This flexibility means that it is important that all parties are able to be heard in relation to any proposed development not just the developer talking exclusively to council planning and heritage staff.

We are very supportive of the protection of historically significant areas of Christchurch. The earthquakes have erased so much that it is important to proactively identify areas that can be kept as intact as possible to keep that history alive for future generations. The Chester St/Dawson Lane RHA is of particular value because of its potential archeological richness and its capturing of many architectural eras. To ensure its future is protected we believe that the properties from 230 – 250 on Kilmore St should be included. In the interim we would like to see the matters of discretion for a consent be extended and notification of owners on the shared boundary be automatic.

Details of submitter No: 1003 - Melissa Macfarlane

Submitter:	Melissa Macfarlane
Submitter Address:	

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 01/05/2023

First name: Melissa

Last name: Macfarlane

Postal address:

Email:


Daytime Phone:

Would you like to present your submission in person at a hearing?

☐ Yes

Additional requirements for hearing:

Attached Documents

Name	
Submission on PC13 Uploaded	

Submission on: PC13 - Heritage Plan Change and PC-14 Housing and Business Choice

From: Melissa Macfarlane



Provision	Position	Comment	Relief sought
Chapter 2 Definitions Definition of 'Alteration'	Object	The definition of 'alteration' has been amended to include reference to 'heritage areas'. I note that 'residential heritage areas' are proposed to be included in the definition of 'heritage fabric'. The definition of alteration is very broad. It is unclear if very minor changes would be classified as alterations. For example, it could be argued that installing a cat door to a dwelling (or indeed a garage) is an alteration as it is a change or modification to a building in a residential heritage area and it involves the permanent modification of heritage fabric which is not decayed or damaged.	Provide more examples of changes that would not be considered 'alterations'.
Chapter 2 Definitions Definition of 'Heritage Fabric'	Object	<p>The amended definition includes 'heritage area'. As a result, it appears that all the buildings (not just the defining and contributory dwellings), and indeed 'any physical aspect' within a residential heritage area will be automatically captured in any rule covering modifications to or demolition of 'heritage fabric'.</p> <p>This is not justified by a heritage area approach as it is the wider heritage area and consistency in built form envelopes, building style and layout on the site that is the justification for creating residential heritage areas, rather than the fabric of the individual buildings themselves which are not individually listed. It is also inefficient and inappropriate to include buildings other than those identified as defining and contributing in the definition of heritage fabric.</p>	<p>Exclude 'heritage area' from the definition of 'heritage fabric'.</p> <p>Or, exclude heritage area buildings that are not defining or contributory.</p>
Rule 9.3.4.1.3 RD1	Object	This rule includes reference to 'heritage fabric'. Because of the inclusion of residential heritage areas in the definition of heritage fabric RD1 covers residential heritage areas. RD6 also covers residential heritage areas. Therefore, the same activity appears to be simultaneously covered by RD1 and RD6.	Exclude heritage areas from the definition of heritage fabric or amend RD1 so it does not apply to activities covered by Rule 9.3.4.1.3 RD6.

Rule 9.3.4.1.3 RD6	Object	<p>The proposed rule appears to make any new buildings and alterations to <u>any</u> building exteriors (whether it is to the defining building or to another building on the site, such as a garage) restricted discretionary activities (noting the exclusions in clause c. It is not clear if the rule is restricted only to the dwellings themselves, or if it covers all buildings on the site.</p> <p>I note the dwellings themselves are not listed, and neither are the settings, so it seems onerous that a new building (which could include a 7m² garden shed) requires resource consent (unless located to the rear of the dwelling and less than 5m in height).</p> <p>Any alterations to any building exteriors, which could include minor works such as installing a cat door to the defining building or a side door on a detached garage, would appear to require resource consent. This is onerous and has the practical effect of listing the dwelling and any other existing buildings, and also listing the setting. This is excessive as the dwelling itself is not a listed heritage item and neither are any other existing buildings on the site.</p> <p>Assuming these are captured, installing a cat door to the main dwelling or a side door to a garage will have no impact on the residential heritage area which has been identified on the basis of a consistent dwelling style (bungalow) and building period (interwar). Alterations would have to be significant before the identified values of the St Albans Residential Heritage Area could be undermined. This rule is therefore inefficient. It is noted that RD6 is similar to RD 1 for alterations to buildings, yet RD1 is appropriate as the rule applies to listed heritage buildings which have specific identified heritage fabric, whereas buildings in a residential heritage area are not individually listed because of their heritage fabric but rather the contribution they make to the wider heritage area. It is not appropriate to have the same alterations rule applying to non-listed buildings in a residential heritage area.</p>	<p>Delete Rule 9.3.4.1.3 RD6 entirely.</p> <p>Alternatively, if Residential Heritage Areas remain included in the proposed plan, include a more appropriate and targeted rule within a residential heritage area such as that set out below, or similar changes which have the same effect of targeting the rule:</p> <p>RD6</p> <p>a. In a Residential Heritage Area</p> <ul style="list-style-type: none"> i. new buildings greater than 30m² in area; or ii. the addition of a second storey to defining or contributory buildings; or iii. the alteration of defining or contributory external building fabric by more than 35%.
Matter of discretion 9.3.6.4	Object	<p>This matter of discretion includes very detailed assessments of impacts on building heritage fabric and values. However, it is the wider</p>	<p>Delete 9.6.3.4.</p>

		<p>residential heritage area that is identified as being worthy of protection, not each individual building – they are not individually listed. The matters of discretion should therefore be targeted to the impact on the values of the wider residential heritage area, not the values of the defining or contributory buildings per se. As such, clauses such as: the retention and integration of existing building fabric, form and appearance and heritage values (viii); the methodologies used in undertaking the works including temporary protection measures (ix); the heritage values of the building (x); and whether heritage NZ has been consulted (d) are not relevant.</p>	<p>If it is to be kept, amend 9.3.6.4 to remove matters that focus on the dwelling itself (which is not individually listed) and target the assessment to impacts on the wider residential heritage area. For example, the matters could be focussed as follows:</p> <ul style="list-style-type: none"> • The extent to which the proposal undermines the consistency in dwelling style and the identified heritage values of housing in the wider residential heritage area; • The extent to which the proposal is consistent with the existing arrangement of buildings on their sites; • Whether the proposed development is visible from a public space.
Appendix 9.3.7.3 Part B HA3	Object	<p>It is accepted that the St Albans Church Property Trustees area has character value. However, it is not considered to be a heritage area given the diversity of dwellings and buildings and lack of detailed site by site assessment focussing on the specific building fabric. The burden of proof for a listed building is significant relative to what has been done for this residential heritage area, yet the rules have the practical effect of listing the buildings and their settings. The approach of creating a heritage area comprising approx. 3 blocks of unlisted buildings and applying rules similar to those applying to listed buildings is not supported. The applicable rules are too onerous relative to the extent of the values sought to be protected and are more appropriate to actual listed heritage items.</p> <p>It is requested that the St Albans residential heritage area is removed and the residential character area is retained.</p>	Delete HA3 from Appendix 9.3.7.3 and retain the area as a residential character area instead.
Appendix 9.3.7.8.2	Object	<p>48 Malvern Street is identified as a 'defining building' for the area which is characterised by inter war Californian bungalows. Bungalows are usually single storey and sometimes 1.5 storeys, whereas 48 Malvern Street is 2-storey.</p>	If the schedule is to remain, identify 48 Malvern Street as a 'neutral building' rather than a 'defining building'.

		<p>This is reinforced by the existing building (which is 8m in height) not meeting the proposed 5.5m maximum height limit for the area.</p> <p>Additionally, 48 Malvern Street has a very large dominating single storey front extension which, while in keeping for materials, is not consistent with a Californian bungalow frontage and was not built in the interwar period. Furthermore, there has been a large addition made to the second storey. 48 Malvern Street should therefore not be identified as a 'defining' example of an interwar bungalow, rather overall it would be more accurately be described as a 'neutral' building, both contributing to, but also undermining the dominant building style in the area.</p>	
14.5.3.2.8(b)(i) Area specific built form standards – road setback	Object	<p>The road boundary setback specified is "6 metres, where existing house is relocated forward on the site...8 metres, where existing house is not retained." If the existing house is not relocated or demolished it is not clear what is the applicable setback is.</p> <p>It is also not clear if this rule applies to all buildings or just the dwellings.</p>	Amend the rule to apply a minimum 6m setback for all buildings.
Rule 15.5.3.2.3(b)(v)(b)	Object	The maximum building height limit is 5.5 metres, however there are many buildings in the area already in excess of that height. This is because the area does not solely comprise single storey bungalows.	Amend Rule 15.5.3.2.3(b)(v)(b) to enable 2 storey buildings.
Rule 14.5.3.2.8(c)(ii)	Object	<p>This rule applies a 2m and 3m building setback for side boundaries and 3m setback from rear boundaries. These setbacks should only apply to the primary building on the site, i.e. the residential dwelling, rather than all buildings. This is in keeping with the spatial arrangement of buildings currently in the St Albans residential heritage areas, where there are many accessory buildings built to the boundary.</p>	<p>Amend Rule 14.5.3.2.8(c)(ii) so that it only applies to residential dwellings and not accessory buildings.</p> <p>Accessory buildings will need to comply with the standard zone provisions for boundary setbacks.</p>
Policy 9.3.2.2.3 Policy 9.3.2.2.5 Policy 9.3.2.2.8	Object	The proposed changes appear to bring residential heritage areas into existing policies covering the management, ongoing use and demolition of historic heritage. These policies include specific direction for works on heritage items and generally severely limit these. The policies make sense when applied to individually listed items with specific and important heritage fabric. However, the level of specificity and restrictions are onerous for buildings included by virtue of being within a wider heritage area as they are interwar	<p>Delete references to heritage areas.</p> <p>If required, instead include a new fit for purpose targeted policy for residential heritage areas that focuses on impacts on the recognised values of the area, i.e. interwar Californian bungalows.</p>

		<p>Californian bungalows. If a policy is required for residential heritage areas, then it should be targeted to impacts on the values of the area, i.e. impacts on the heritage value of interwar Californian bungalows, rather than the values of the individual building and setting.</p>	
Rule 14.4.3.1.2(C1)	Support	<p>I support the erection of new buildings and alterations to existing dwellings in a residential character area remaining a controlled activity.</p>	<p>Retain 14.4.3.1.2(C1)</p>
Rule 14.5.3.1.2(C1)	Oppose	<p>I oppose the erection of new minor buildings and alterations to existing dwellings and other buildings in a residential character area being deleted from this rule. I also oppose the changes to fences and walls. It is appropriate that these activities are only controlled activities in character areas.</p>	<p>Reinstate Rule 14.5.3.1.2(C1) as per the Operative Plan.</p> <p>Alternatively, amend this rule so that alterations or additions to existing dwellings and other buildings, and the erection of new buildings less than 30m² and fences and walls are all classified as controlled activities.</p> <p>New dwellings and accessory buildings over 30m² would be RDIS – see Rule 14.5.3.1.3 RD14 below.</p>
Rule 14.5.3.1.3 RD14	Oppose	<p>I oppose the inclusion of alterations or additions to existing or accessory buildings or new small accessory buildings and fences and walls being a restricted discretionary activity in residential character areas. This rule should be targeted at new dwellings and new large accessory buildings (e.g. over 30m² which is the size of a small double garage), as it is these changes that have the greatest potential to undermine the character of an area. Also, I note that many accessory buildings will have no or may even undermine the residential character of the area and it therefore seems unreasonable to require resource consent to make minor alterations to these non-contributing buildings.</p> <p>I note that the proposed definition of ‘alterations’ is very broad, and if applicable to buildings in character areas, could capture installing a cat door. As such, installing a cat door on a garage in a residential character area would appear to require resource consent as an RDIS activity. This is not efficient or effective in managing residential character.</p>	<p>Amend Rule 14.5.3.1.3 RD14 so that it only applies to the demolition or removal or relocation or erection of a building greater than 30m².</p> <p>The proposed exclusions would still need to apply, except where required to meet the above.</p>

Details of submitter No: 1005 - Kate Askew

Submitter:	Kate Askew
Submitter Address:	

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 28/04/2023

First name: Kate

Last name: Askew

Postal address:

Email:

Daytime Phone:

Would you like to present your submission in person at a hearing?

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Consultation Document Submissions

Provision: Chapter 9 Natural and Cultural Heritage

Seek Amendment

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

10 Shelley Street - I seek for the house at this address to be upgraded to a defining building.

My submission is that:

I support the inclusion of Heritage Areas's including HA11 Shelley Forbes Street, and the classification of the building at 11 Shelley Street as a defining building. This being my home.

I consider the house at 10 Shelley Street, should also be upgraded to a defining building, as it is currently being renovated, and maintains much of its original bones beneath the stucco. This building is the same age and of similar style to #9 Shelley Street, and are in my opinion a matching pair, that should be given the up most protection to be retained.

I support the introduction of Policy 9.3.2.2.2 and the changes in general as they pertain to Residential Heritage Areas, including Rule 9.3.4.1.3 RD6, provided the wording of this rule continues to include an exemption for buildings that are located to the rear of the main residential unit on the site and less than 5m in height.

Details of submitter No: 1007 - Ian Shaw

Submitter:	Ian Shaw
Submitter Address:	
Behalf of:	Ian and Karen Shaw

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 30/04/2023

First name: Ian

Last name: Shaw

On behalf of:  Ian and Karen Shaw

Postal address:

Email:

Daytime Phone:

Would you like to present your submission in person at a hearing?

Yes

Additional requirements for hearing:

Consultation Document Submissions

Provision: Chapter 1 Introduction

Seek Amendment

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

The area in which changes are sought are:

1. The area East of Dorset Street to Fitzgerald Avenue.
2. The properties located on Kilmore Street that abound the heritage area of Chester Street East, eg., the North boundaries of 129, 131 and 133 Chester Street.

My submission is that:

My wife and I wish to seek amendment to the proposed changes that affect the heritage area of Chester Street East, to protect the significant heritage of the area in an all-inclusive cohesive manner and protect the existing properties that constitute their classification, as 'Defining'.

Details of submitter No: 1008 - Mark Winter

Submitter:	Mark Winter
Submitter Address:	[REDACTED]

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 30/04/2023

First name: Mark

Last name: Winter

Postal address:

Email:

Daytime Phone:

Would you like to present your submission in person at a hearing?

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Consultation Document Submissions

Provision: Chapter 10 Designations and Heritage Orders

Oppose

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

I am asking on behalf of ourselves and other residents of Beverley St, that the council reconsider the proposed change of zoning to MDZ and retain a Heritage/Character. status. I believe this better reflects the uniqueness of the architecture of homes in this street and honours and cherishes the legacy left by at least two of Christchurch's foremost architects.

My submission is that:

Beverley St has been considered a street with houses of architectural significance and designated SAM until this time.

The street remains unique and significant with many houses designed by Cecil Wood or Heathcote Helmore, pre eminent and leading architects of their time. Following the earthquakes Christchurch has lost many beautiful homes some designed by these architects and I believe we should cherish and protect what is left.

Sadly, some houses in the street have been lost as a result of post earthquake assessments but rebuilds have been architecturally designed and in sympathy with the old and existing homes.

Details of submitter No: 1009 - Richard Abey-Nesbit

Submitter:	Richard Abey-Nesbit
Submitter Address:	

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 30/04/2023

First name: Richard

Last name: Abey-Nesbit

Postal address:

Email:

Daytime Phone:

Would you like to present your submission in person at a hearing?

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Consultation Document Submissions

Provision: Chapter 3 Strategic Directions

Seek Amendment

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

The council should officially recognise the perverse economic incentive of some (though certainly not all) who campaign for heritage designation and require that this be considered when future changes are made to heritage designations.

My submission is that:

I am generally in favour of reducing designated heritage areas. I am generally in favour of limiting designated heritage areas to those that genuinely possess a consistent style of built environment that is unique to that area, when considering other protected areas.

Cultural heritage in our build environment is important, but in the past heritage designations have been overused and weighted in favour of heritage at the expense of the well-functioning of the city and the living experience of its residents.

Heritage designations have been used cynically by land owners to artificially inflate the price of land for their own economic benefit at the expense of those who are less well off financially; this is inexcusable and the council needs to keep a close eye on this phenomenon going forward, and consider it in their changes to heritage plans.

Provision: Chapter 7 Transport

Support

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

My submission is that:

It is important that the council not allow heritage designation to prevent improvement of public transport or walkability in any area of the city, and must not be used to enshrine car dependency. While poor urban design that forces car dependency is indeed a part of our heritage, it is a blight on our city that we should be ashamed of and seek to eliminate, rather than 'preserving' into the future.

If people want to ensure that we do not forget how badly it is possible to design a city, I suggest the council sets aside funds for a museum piece on past mistakes in the design of the city rather than committing to preserving and extending the poor decisions of the past.

Provision: Chapter 5 Natural Hazards

Support

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

My submission is that:

In any scenario where natural heritage comes into conflict with the protecting the safety and/or health of residents of the city (or visitors to the city), safety and health should be given priority. If an important heritage site requires significant funding to be made safe, the council should invite concerned parties to establish a private community fund to perform the necessary works.

Details of submitter No: 1012 - John Hardie

Submitter:	John Hardie
Submitter Address:	
Behalf of:	JG & JL Hardie Family Trust

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 02/05/2023

First name: John

Last name: Hardie

On behalf of: JG & JL Hardie Family Trust

Postal address:

Email:

Daytime Phone:

Would you like to present your submission in person at a hearing?

Yes

Additional requirements for hearing:

Consultation Document Submissions

Provision: Chapter 9 Natural and Cultural Heritage

Oppose

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

The JG & JL Hardie Family Trust is part owner of the property situated at 47 Rue Balguerie Akaroa. Appendix 9.3.7.2 of PC 13 entitled 'Schedule of Significant Historic Heritage Items' lists the Trust property as having 'significant' heritage applying to both the dwelling and setting. The schedule uses the numbers 1152 and 127, but also says the property has been 'not yet assessed'.

The property has been in the same family interests for about 35 years. A significant fire occurred in about 2005 and the property was substantially damaged, particularly the interior. The owners determined to upgrade the property rather than demolish it, and at that time a resource consent was needed for any exterior changes to the property. A resource consent was obtained to allow exterior alterations. The property was then rebuilt.

The Trust does not know how it came to be suggested that there could be restrictions on alterations to the interior, and neither does it know how it could be suggested that the setting of the house could be relevant. By this the Trust assumes the land upon which the property is situated. The Trusts submitted at the time of the last Plan review to support a continuation of controls on exterior modifications to the house. If that Plan process introduced further controls, they were done without reference to the Trust. All submissions were checked and no submission sort specifically to change the heritage status by way of additional controls. The Trust is the view that if such controls were introduced, they are ultra vires.

That is the background to this submission. It seems clear that further controls on the property are sought in this plan change process. The interior of the house was substantially modified after the fire and modernised. Little of the original remains. There is no section 32 analysis as to why such controls would be necessary, and the plan change even admits that the property has not been investigated or assessed, and that in itself demonstrates that there is no section 32 analysis to justify controls that are sought. The Trust opposes whatever rules are proposed to suggest heritage rules based on anything other than the exterior of the property. It would reluctantly live with those as they are long-standing, but if more controls are sought, then it intends to oppose any Heritage listing with respect to the property and/or grounds. Any rules in PC 13 which purport to be imposed upon the property are opposed.

My submission is that:

Details of submitter No: 22 - Peter Beck

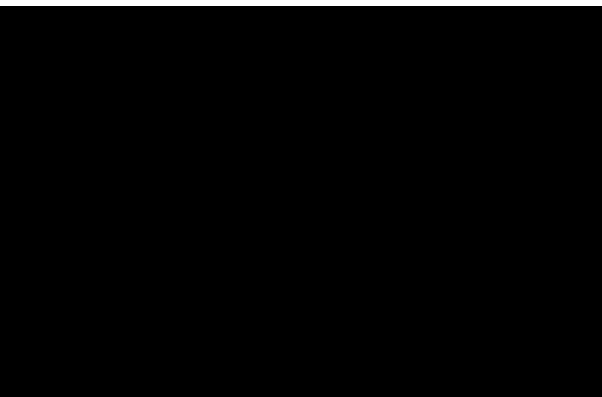
Submitter:	Peter Beck
Submitter Address:	

Our proposed Housing and Business Choice Plan Change (PC14)

Submitter Details

First name: Peter **Last name:** Beck

Preferred method of contact Email



Age: 65-79 years

Gender: Male

Ethnicity: New Zealand European

I could not
Gain an advantage in trade competition through this submission

I am not
directly affected by an effect of the subject matter of the submission that :
a. adversely affects the environment, and
b. does not relate to the trade competition or the effects of trade competitions.

Note to person making submission:

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991

Would you like to present your submission in person at a hearing?

☐ Yes

☒ I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Attached Documents

File
Submission to CCC Heritage Plan change 14

Submission to the Christchurch City Council on Heritage Plan change 14

By: Peter Beck

24.04.2022

Contact: [REDACTED]

My submission asks the City Council reaffirm the amendment that it passed at its meeting of 13 September 2022: that the special heritage and character of Chester Street East include the whole of Chester Street East not merely 3/4 of the street.

I wish to reference the submission of Bosco and Helen Peters on 12 April 2023. I strongly support their submission and wish to add the following comments.

As the owner of 6/173 Chester Street East it is clear that the consultant who provided his/her recommendation is completely mistaken in that the argument against including the whole of the street used a percentage-of-historic-dwelling calculation system that counted the seven historic units at 173 only as 'one' building. In fact they are and have always been each under separate title. Astonishingly the consultant states that 'because it has been partly rebuilt, its heritage values are compromised'. On the basis of this logic then such buildings as the Cathedral in the square [of which I was Dean from 2002 to 2012] clearly has its heritage value compromised!!.

The consultant clearly did not realise that historically [and currently] these units were mixed-use commercial and residential from their construction. It is simply wrong to state that they are simply 'a non-residential building converted to residential use.'

This incorrect analysis has resulted in the belief that the high standard required by the legislation has not been reached in our street. In fact this is because of the underestimation of both the numbers and the historical nature of the buildings. This result of this mistaken analysis is that already two buildings over 100 years old have already been demolished. It is my view that this should not be allowed to continue.

I respectfully ask the City Council to include the whole of Chester Street East in preserving and enhancing areas of special heritage and character and so leave a legacy for current and future generations.

Details of submitter No: 37 - Susanne Trim

Submitter:	Susanne Trim
Submitter Address:	

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 28/04/2023

First name: Susanne

Last name: Trim

Preferred method of contact Email

Postal address:

Email:

Daytime Phone:

Would you like to present your submission in person at a hearing?

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Person of interest declaration: I am *

Explain the grounds for saying you come within category (a) or (b) above:

Note to person making further submission:

- A further submission can only support or oppose an original submission listed in the summary. It is not an opportunity to make a fresh submission on matters not raised in the submission.
- A copy of your further submission must be served on the original submitter within 5 working days of making the further submission to the Council

Consultation Document Submissions

Provision: Chapter 14 Residential

Support

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

My submission is that:

Much as I dislike the idea of intensification I see it is a must for the future and agree with the general direction of the Council's proposals. I support the modifications proposed to the National MDRS under the qualifying matters provision.

Special consideration to intensification proposals needs to be given due to flooding potential as areas of Christchurch are so low lying and in the Waimakariri flood plain and mapping of areas subject to liquefaction in the event of an earthquake. Residential intensification should not occur in these areas.

In terms of the increased heritage coverage, I support most of the proposed areas except Heaton St. There has been so much change down that road already I think it would be a waste of time. Personally, I think streets

such as Mary and Rayburn Streets probably show off that mid 20th century suburban architecture more appropriately.

And I know you may not be taking submissions on this, but I fully support the proposed, agreed and now put on hold, development of the Harewood Road cycleway. That is truly THE most dangerous street I have cycled down in Christchurch.

Details of submitter No: 57 - Debbie Smith

Submitter:	Debbie Smith
Submitter Address:	

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 29/04/2023

First name: Debbie

Last name: Smith

Preferred method of contact Email

Postal address:

Email:

Daytime Phone:

Would you like to present your submission in person at a hearing?

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Person of interest declaration: I am *

Explain the grounds for saying you come within category (a) or (b) above:

Note to person making further submission:

- A further submission can only support or oppose an original submission listed in the summary. It is not an opportunity to make a fresh submission on matters not raised in the submission.
- A copy of your further submission must be served on the original submitter within 5 working days of making the further submission to the Council

Consultation Document Submissions

Provision: Chapter 6 General Rules and Procedures

Oppose

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

The dimensions of the site at **166 Chester Street - narrow frontage with a total land area of 550m²** - does not allow space for any design variation for a 3-4 level development to mitigate the loss of light to my neighbouring property. The possible amalgamation of a number of these smaller narrow sites may allow for better more creative design to lessen impacts to neighbours, but the No.166 site alone can only allow for one skinny towering box that will shadow everything to its east.

I wish to see the following amendments to the above provision:

- minimum land size significantly increased, and
- minimum street facing site dimension increased
- allowing for the two amended points, greater attention to the mitigation of the loss of sunlight to neighboring properties should be required

My submission is that:

My submission, as the owner of 2/168 Chester Street, is that I oppose the "High Density Zoning provision along the street" that will allow a four-level tower development on the neighboring section at **166 Chester Street**.

Given my unit block is a ground one level development (built in the 1970s) with the living areas facing west, there is no need for 'architectural modelling analysis' to appreciate that a 4 level, or even a 3 level tower on my western boundary would **block ALL sun** to my row of units for the majority of daylight hours.

The most attractive / valuable / positive aspect of my property is the beautiful afternoon sun it receives deep into its living area and full courtyard with outside washing line. The light/sun is what I have loved about living in this property for the last 23 years. There is no question that the limited light resulting from a potential neighboring tower will change this unit dramatically, making it a cold, sunless, uninviting place to live in combination with the loss of privacy. Given the direction and placement of sites along Chester Street in relation to 'aspect', this new provision will negatively impact so many people currently enjoying the simple healthy standard of good housing and mental wellbeing, that of light!

The dimensions of the site at **166 Chester Street - narrow frontage with a total land area of 550m² - does not allow space for any design variation for a 3-4 level development to mitigate the loss of light to my neighbouring property**. The possible amalgamation of a number of these smaller narrow sites may allow for better more creative design to lessen impacts to neighbours, but the No.166 site alone can only allow for one skinny towering box that will shadow everything to its east.

I wish to see the following amendments to the above provision:

- minimum land size significantly increased, *and*
- minimum street facing site dimension increased
- allowing for the two amended points, greater attention to the mitigation of the loss of sunlight to neighboring properties should be required.

I understand that the 'city' needs to accommodate greater population, but as a result of a planning rule change such as this, a great many of current homes will become much less livable in a climate such as Canterbury. Planning should not just ignore the living conditions of current residents to try and include new ones.

Provision: Chapter 9 Natural and Cultural Heritage

Seek Amendment

I seek the following decision from the Council


If seeking to make changes to a specific site or sites, please provide the address or identify the area:

My submission is that:

This submission asks that The Christchurch City Council reaffirm the amendment that it passed at its meeting on 13 September, 2022: that the special heritage and character of Chester Street East include the whole of Chester Street East not merely ¾ of the street.

Please refer to the attached document for my full submission.

Attached Documents

Name
HeritageChangePlanSubmission 

SUBMISSION TO: The Christchurch City Council

ON: Heritage Plan Change

BY: Debbie Smith – Owner in and Resident of Chester Street East

CONTACT: [REDACTED]

1. SUMMARY OF MY SUBMISSION

This submission asks that The Christchurch City Council reaffirm the amendment that it passed at its meeting on 13 September, 2022: that the special heritage and character of Chester Street East include the whole of Chester Street East not merely $\frac{1}{3}$ of the street.

I strongly support the positive intention of The Christchurch City Council to preserve and enhance areas of special heritage and character whilst encouraging increased inner-city living.

Over a period of half a century, The Christchurch City Council has, in creative partnership with local residents in Chester Street East and Dawson Street, established a unique, treelined, densely-populated, inner-city residential area. Connecting is one of the five ways to wellbeing and achieving a health promoting community. Not including the *whole* street would severely threaten the nature of the street and its cohesion.



Above: The green line includes the area proposed by the residents of Chester Street East to be recognised as a special heritage area in our city, with Chesterfields Park located at its heart. This was moved as an amendment by Councillor Jake McLellan on 13 September 2022 and passed by The Christchurch City Council. After passing this amendment, the Council voted against implementing the Government's intensification policy in which this amendment was contained.

2. HISTORICAL BACKGROUND

Chester Street East is as wide a street as its neighbouring Kilmore Street (and other inner-city streets). But from the 1980s, the Christchurch City Council began a visionary narrowing and beautification of this street (in the Western half – Madras to Barbadoes Streets – with 2 road humps, 2 curves, and a splitter island; in the Eastern half – Barbadoes Street to Fitzgerald Avenue – with 5 road humps and build-outs as pinch points). Powerlines were removed. Trees were planted on the footpaths on both sides of the street. Dawson Street was included in the beautification by the addition of permanent planter features.



The Eastern half of Chester Street East prior to CCC development in the 1980's



The Eastern half of Chester Street East in 2022 – post CCC development

Historically, this area is in the planned city park which was to have gone all the way around the central city. It retains this park-like feel. In the quakes, some trees were lost at the Northeast corner, and it is my understanding that the intention is that they be replaced – the plots for each of these trees still exist, awaiting replanting, in the footpath.

3 From the mid-19th Century, cottages and other dwellings were established in this area. Dwellings have continued to be built up to the present.

The street was bookended in the West by the grand houses starting at 86 Chester Street East. At the East, the Fitzgerald Avenue end, the bookend was, until the quakes, the Crighton Cobbers Youth & Community Club buildings (connected to Ward's Brewery). I look forward to a building on this North-East corner which connects to this history in the manner that Flow Wellbeing Centre (229 Fitzgerald Avenue) has shown is possible.

Already, as part of acknowledging the full street's special character, in the Eastern quarter of the street, there is the wonderful refurbishment of the 7 historic units at 173 Chester Street East which sit adjacent to an 1880s cottage, and so on.

In the 2010s, The Christchurch City Council was again visionary in developing the Chesterfields Community Garden (160 Chester St East). This garden now forms the heart of the street and its strong sense of community.



The Christchurch City Council recognised the whole street as the Chester East neighbourhood (<https://ccc.govt.nz/culture-and-community/central-city-christchurch/livehere/our-central-neighbourhoods/chester-east-neighbourhood>).

The special character of this whole street is of a 1980s inner-city-renewal, traffic-calmed, tree-lined street. There were plans to apply such renewal to other inner-city streets also – they were never implemented. As such, individual dwellings, from the second half of the 19th Century through to the present day, can be seen to be defining and contributory dwellings.

There is no other street like this in the inner city, within the boundary of the four avenues. Dawson Street shares in this described sense of this neighbourhood; it is to be noted that all the trees on Dawson Street are on private property. The distinguishing character of Dawson Street is in reflecting the sense of the integrity of Chester Street East.

3. ONGOING DEVELOPMENT

The Christchurch City Council meeting of 13 September, 2022, passed the amendment to extend the Chester St East/Dawson St heritage area to include all properties with a Chester St East address but then the Council voted against the Plan as a whole in which this amendment occurred. This leaves the nature of Chester Street East in the current consultation process. I seek that the amendment that was passed by The Council in 2022 be included in the final Plan currently being consulted about.

Arguments against including the whole of the street include a percentage-of-historic dwelling-calculation system that counts the seven historic units at 173 only as “one” building, and astonishingly (!) states that “because it has been partly rebuilt, its heritage values are compromised” (by such non-Christchurch logic the Cathedral in the Square, and in fact every building in Christchurch, has its heritage value compromised). The consultant did not realise that historically (as

now!) these units were mixed-use commercial and residential, claiming that they are simply “a non-residential building converted to residential use”. Since the Council’s September 2022 decision, which left our street in limbo, in the Eastern quarter of Chester Street East being discussed, two dwellings over 100 years old have been demolished, and two further dwellings over 100 years old are intended to be demolished. So, the calculating system has become a self-fulfilling prophecy: the percentage of older dwellings is dropping because the high threshold was not reached by underestimating both the numbers and the historical nature of the dwellings currently there.

Excluding the Eastern quarter of Chester Street East from the proposed Residential Heritage Area threatens the cohesion of the area, relegates Chesterfields to the edge of the community rather than being its heart, disconnects this area from its natural relationship with Fitzgerald Avenue and the neighbouring Englefield/Avonville RHA. Separating the nature of the Eastern quarter of Chester Street East from the rest of the street threatens to undermine the uniqueness of the whole street with issues of excess traffic flow, parking, and other problems.

Formal acknowledgment, in the manner we have advocated, of the special character of the whole of Chester Street East would have it as connecting Te Papa Ōtākaro/Avon River Park and City Promenade on its West end with the tree-lined Fitzgerald Avenue on its East end, and from there into the Red Zone in the North and associating it with the next Residential Heritage Area beginning at Elm Grove and going through into Beverley Park. Such a recognition of Chester Street East as a whole by The Christchurch City Council continues the visionary planning of the Council in 2022, previous years and decades, and builds on the passion of and partnership with the local residents, and continues the encouragement of the residents and owners in this partnership of enhancing the special character and also the green nature of this part of our Garden City.

This submission is not about discouraging inner city living – quite the opposite: the neighbourhood of the whole of Chester Street East and Dawson Street, centring on Chesterfields (rather than seeing that park as being on the edge of the neighbourhood) is an excellent example of the benefits and sense of community of inner city living. The City Council’s decision to wisely include the whole of Chester Street East in preserving and enhancing areas of special heritage and character will leave a legacy for current and future generations to flourish in our city.

Date of this submission: 29 April 2023

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 18/03/2025

First name: Otto

Last name: Snoep

Postal address:

Email:

Daytime Phone:

*

I could not **Gain an advantage in trade competition through this submission**

directly affected by an effect of the subject matter of the submission that:

a. adversely affects the environment, and

I am not **b. does not relate to the trade competition or the effects of trade competitions.**

Note to person making submission:


If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991

Would you like to present your submission in person at a hearing?

Yes

Additional requirements for hearing:

Attached Documents

Name
PC13 Otto Snoep submission 4 pages 

Submission on a publicly notified plan change to the Christchurch District Plan

For office use only
Submission no:

Clause 6 of Schedule 1, Resource Management Act 1991

Submissions can be:

Posted to: City Planning Team
Christchurch City Council
PO Box 73012
Christchurch 8154

Delivered to: Ground floor reception
53 Hereford Street
Christchurch
Attn: City Planning Team

Emailed to: PlanChange@ccc.govt.nz

For Office Use Only
Received in Council Office

Date

Time

Person

* Denotes required information

I wish to make a submission on:

Plan Change Number:* ~~12~~ (13)

Your name and contact details

Full name of person **or** organisation making submission:*

OTTO SNOEP

Address for service:*

[Redacted Address]

Email:

Phone:*

[Redacted Phone]

Trade competition and adverse effects* (select appropriate)

Could you gain an advantage in trade competition through this submission?

☐ Yes ☒ No

(delete the following paragraph if you have indicated no above (you could not gain an advantage in trade competition))

If yes, are you directly affected by an effect of the proposed plan change/part that:

- (a) adversely affects the environment, and
- (b) does not relate to the trade competition or the effects of trade competition?

☐ Yes ☐ No

NOTE: If you answered no to this question, you cannot make a submission, as per clause 6(4) of Part 1 of the Schedule 1 of the RMA 1991.

The specific provisions of the plan change that my submission relates to are as follows:* (Please continue on separate sheet(s) if necessary.)

IN THE MATTER OF THE RESOURCE MANAGEMENT ACT 1991

I note the public notice received on 17 March 2023, inviting my submission on Plan Change 13 of the district plan for listing of baches at Taylors Mistake as a heritage items and settings in the heritage register, is not a proposal. The Notice is an announcement of a Declaration by council arbitrarily made without prior public consultation of the listing.

My submission is that I retrospectively oppose Plan Change 13 for any bach at Taylors Mistake listed as a heritage items and settings in the heritage register.

My submission is that:* (You should clearly state whether you **support or oppose** the specific proposed provisions **or wish to have them amended**. You should also state the reasons for your views. Please continue on separate sheet(s) if necessary.)

Refer Attachment A

See on reverse side of sheet 2 8/28/9/2023.

I seek the following decision from the Council:* (Please give precise details stating what amendments you wish to see made to the proposed Plan Change. Please continue on separate sheet(s) if necessary.)

IN THE MATTER OF THE RESOURCE MANAGEMENT ACT 1991

Action requested:

1. That the heritage listing designation of baches at Taylors Mistake and its Bays are over-turned.
2. That resource consents are issued that allows the demolition of all heritage listed baches
3. That the hearing of submissions is conducted and heard by an Independent Commissioner and preferably a legal person from out of town.

Please indicate by ticking the relevant box whether you wish to be heard in support of your submission*

☒ I wish to / ☐ I do not wish to speak at the hearing in support of my submission.

Joint submissions (Please tick this box if you agree)

☐ If others make a similar submission, I will consider presenting a joint case with them at the hearing.

If you have used extra sheets for this submission, please attach them to this form and indicate below*

☒ Yes, I have attached extra sheets.

☐ No, I have not attached extra sheets.

Signature of submitter (or person authorised to sign on behalf of submitter)

A signature is not required if you make your submission by electronic means.

Signature:

[Handwritten signature]

Date: 20/4/23

Submissions are public information

The information requested in this submission, including your contact details, is required by the Resource Management Act 1991. A copy of your submission will be made available for inspection at all Council service centres and libraries in accordance with the requirements of the Act. A document summarising all submissions and including names and addresses of submitters will be posted on the Council's website.

If you consider there are compelling reasons why your contact details should be kept confidential, you should contact the Statutory Administration Advisor at 941 8999.

Attachment A - Submission by Otto Snoep

IN THE MATTER OF THE RESOURCE MANAGEMENT ACT 1991

The reasons for my **opposition** to the Plan Change 13 are:

1. This Declaration is a pre-emptive strike by council to lock-in a decision to prevent any opposition to the heritage listing by bach owners and the public in a democratic hearings process.
2. The public notice of the Declaration made by council in Plan Change 13 for heritage listing of the baches as items and setting is not made with open-mind and is presented as a fait-accompli. The listing of the baches was predetermined in a decision by council under Resolution CNCL/00073/2019 and give effect to the condition in the Deed of Licence Agreements with bach owners.
3. Opposition to Plan Change 13 with respect the listing of the baches triggers a resource consent process and potential referral to the Environment Court.
4. The Declaration does not accord matters at law under the Resource Management Act 1991 or general law and Parliament's instruction.
5. The provision in Plan Change 13 for protection of the baches as heritage items and setting is an inappropriate land use of public land in the coastal environment.
6. The history of the baches at Taylors Mistake has been thoroughly canvassed up to 2002 by various commissioners and in the Environment Court in 2002. There is nothing new in Plan Change 13 what has not already been considered in detail by experts in their advice on the matter to commissioners and court.
7. That history has recently been reviewed by the Independent Hearings Panel in 2016 in Decision 52 and is incorporated in the present operative district plan.
8. That the occupation of designated public recreation land in council's ownership, on the coastline by these baches, for private use, constitutes a significant issue that is of national importance, recognised under s. 6 according to the Independent Hearing Panel at paragraphs 48 and 53. This is so to meet the resource management purpose under s. 72 of the RMA; the functions imposed on authorities under s. 31 (1) (a) and (b) that need to have regard to; the evaluation of the proposal under s.32; and duties imposed under s. 75 (3) that must be given effect to under the Act.
9. Section 6 (d) – public access and section 6 (f) – heritage protection, are not mutually inclusive with the physical presence of the baches located on public land and their interference with public access a matter of fact. The Independent Hearing Panel has determined, on the established evidence (paragraph 61), that it is most important to have regard to public access under s. 6 (d) rather than heritage protection under s.6 (f). The Panel did not specifically consider the heritage of all baches as being of importance.
10. As the issue stands: It requires that heritage protection meets the qualifying standard of matters in the Statement of Significance, notified in Appendix 6 of the s.32 evaluation and provisions. In my opinion the Statement of Significance of the baches falls short on meeting the qualifying standard as I shall explain in the hearing of the submission.

B 24/4/23

Details of submitter No: 135 - Melissa Macfarlane

Submitter:	Melissa Macfarlane
Submitter Address:	

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 02/05/2023

First name: Melissa

Last name: Macfarlane

Preferred method of contact Email

Postal address:

Email:

Daytime Phone:

Would you like to present your submission in person at a hearing?

Yes

Additional requirements for hearing: None.

Person of interest declaration: I am

*

Explain the grounds for saying you come within category (a) or (b) above:

Note to person making further submission:

- A further submission can only support or oppose an original submission listed in the summary. It is not an opportunity to make a fresh submission on matters not raised in the submission.
- A copy of your further submission must be served on the original submitter within 5 working days of making the further submission to the Council

Consultation Document Submissions

Provision: Chapter 14 Residential

Support

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

Retain any applicable residential character qualifying matters for the St Albans Malvern Street area, except those I have specifically submitted on.

Delete any applicable residential heritage area qualifying matters for the St Albans Church Properties Subdivision area.

My submission is that:

In addition to my previously submitted submission, I would like to clarify that I generally support residential character qualifying matters applying to my house and the wider St Albans area around Malvern Street.

I do not support the area being a residential heritage area however, and therefore do not support any associated qualifying matters applying on this basis.

Details of submitter No: 145 - Hebe Gibson

Submitter:	Hebe Gibson
Submitter Address:	
Organisation:	Te Mana Ora/Community and Public Health

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 02/05/2023

First name: Hebe

Last name: Gibson

Organisation:

Te Mana Ora/Community and Public Health

Preferred method of contact Email

Postal address:

Email:

Daytime Phone:

Would you like to present your submission in person at a hearing?

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.


Person of interest declaration: I am *

Explain the grounds for saying you come within category (a) or (b) above:

Note to person making further submission:

- A further submission can only support or oppose an original submission listed in the summary. It is not an opportunity to make a fresh submission on matters not raised in the submission.
- A copy of your further submission must be served on the original submitter within 5 working days of making the further submission to the Council

Attached Documents

Name
SubmissionFINAL230502 

2 May 2023

Christchurch City Council
PO Box 73016
Christchurch

Tēnā koutou,

Submission on proposed Heritage Plan Change (PC13) and Housing and Business Choice Plan Change (PC14).

1. Thank you for the opportunity to submit on proposed Heritage Plan Change (PC13) and Housing and Business Choice Plan Change (PC14). This submission has been compiled by Te Mana Ora (Community and Public Health) on behalf of the National Public Health Service and Te Whatu Ora Waitaha. Te Mana Ora recognises its responsibilities to improve, promote and protect the health of people and communities of Aotearoa New Zealand under the Pae Ora Act 2022 and the Health Act 1956.
2. This submission sets out matters of interest and concern to Te Mana Ora.

General Comments

3. Te Mana Ora welcomes the opportunity to comment on the proposed Heritage Plan Change (PC13) and Housing and Business Choice Plan Change (PC14).
4. While health care services are an important determinant of health, health is also influenced by a wide range of factors beyond the health sector, including the housing and communities we live in. These influences are often referred to as the 'social determinants of health'.¹

¹ Public Health Advisory Committee. 2004. *The Health of People and Communities. A Way Forward: Public Policy and the Economic Determinants of Health*. Public Health Advisory Committee: Wellington.

5. The diagram² below shows how the various influences on health are complex and interlinked (Figure 1). Initiatives to improve health outcomes and overall quality of life must involve organisations and groups beyond the health sector, such as local government if they are to have a reasonable impact.

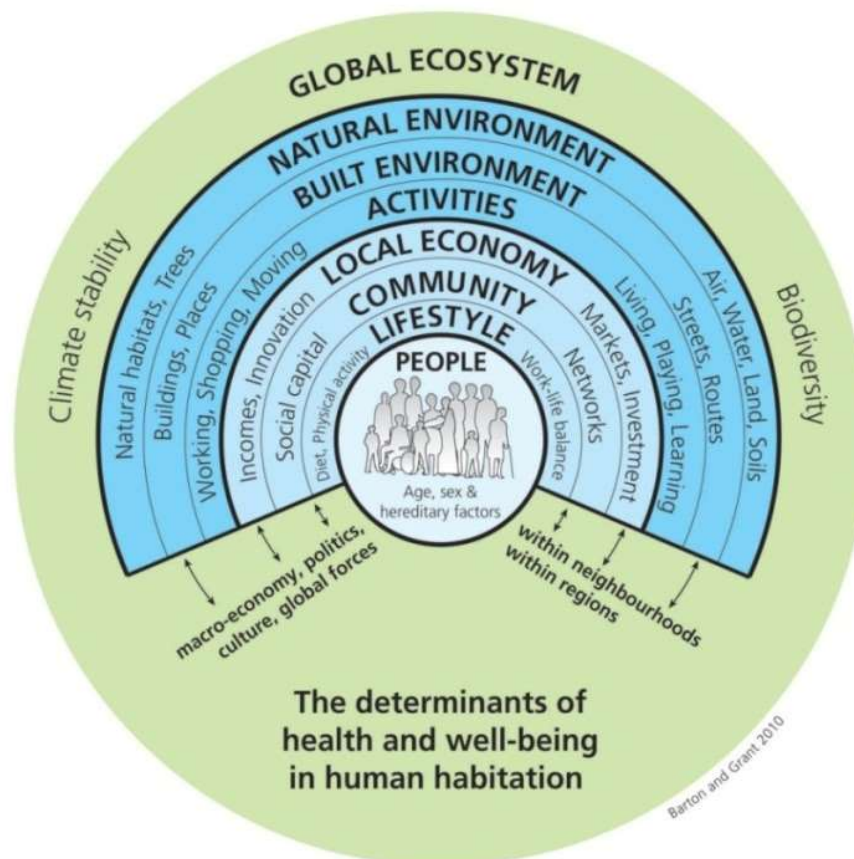


Figure 1: Determinants of health and wellbeing

6. Housing is a critical determinant of health. We spend considerable amounts of time in our homes; young children and older people in Aotearoa New Zealand spend close to

² Barton, H and Grant, M. (2006) A health map for the local human habitat. *The Journal of the Royal Society for the Promotion of Health* 126 (6), pp 252-253. <http://www.bne.uwe.ac.uk/who/healthmap/default.asp>

90% of their time at home.³ Therefore, it is critical that home environments are healthy, warm and dry to support health and wellbeing.

7. Lack of access to quality healthy homes results in health inequities. BRANZ research highlights the importance of housing conditions to occupant wellbeing, noting that people living in poor housing conditions had lower life satisfaction ratings and lower self-ratings of physical and mental health.⁴
8. Additionally, affordable housing is necessary to support better health outcomes for communities. Unstable, insecure and unaffordable housing also has detrimental impacts on physical and mental health, and education outcomes.⁵ Unaffordable housing can also result in household crowding which leads to an increased risk in infectious diseases. Infectious diseases are still the main cause for hospitalisation in Aotearoa New Zealand, largely due to overcrowded households.⁶
9. While Te Mana Ora recognises that there has been controversy in applying the Medium-Density Residential Standards (MDRS) set out in the Resource Management (Enabling Housing and Other Matters) Amendment Act and the National Policy Statement on Urban Development (NPS-UD) 2020 in Ōtautahi Christchurch, Te Mana Ora supports this Government direction. Te Mana Ora recognises the value of building up in existing commercial centres where there is already infrastructure and services in place. Increasing the density of housing, creating more compact urban environments and enabling more affordable housing, can have a positive influence on population health outcomes.
10. Urban environments have been designed in ways that can contribute to poor health outcomes, including through air pollution, noise, heat islands, enabling inactive

³ Howden-Chapman, P., Fyfe, C., Nathan, K., Keall, M., Riggs, L., & Pierse, N. (2021). The effects of housing on health and well-being in Aotearoa New Zealand. *New Zealand Population Review*, 47, 16-32

⁴ Jones, S. & White, V. (2023). *Housing condition and occupant wellbeing: Findings from the Pilot Housing Survey and General Social Survey 2018/19*. BRANZ Study Report SR482. BRANZ Ltd.

⁵ Mueller, E. J., & Tighe, J. R. (2007). Making the case for affordable housing: Connecting housing with health and education outcomes. *Journal of Planning Literature*, 21(4), 371-385.

⁶ Howden-Chapman, P., Fyfe, C., Nathan, K., Keall, M., Riggs, L., & Pierse, N. (2021). The effects of housing on health and well-being in Aotearoa New Zealand. *New Zealand Population Review*, 47, 16-32.

behaviours, and reducing community connectedness.⁷ Te Mana Ora challenges Christchurch City Council to see these plan changes as an opportunity to influence the health and wellbeing of residents in Ōtautahi Christchurch and create better conditions for more health promoting communities.

11. To support the design of health promoting communities, Te Mana Ora recommends that Christchurch City Council uses the Integrated Planning Guide (IPG) when planning housing and neighbourhoods. The IPG, developed by Te Mana Ora with Greater Christchurch Partnership partners, takes a holistic view of health and wellbeing to plan in ways that build stronger and more sustainable social, economic and environmental outcomes.⁸
12. Te Mana Ora also recommends that Christchurch City Council considers other factors that the Council can influence with these plan changes. Within the Consultation Document, there is a list of factors 'we can influence' highlighted on page 7. However, Te Mana Ora argues that there are further opportunities to influence health and wellbeing outcomes of communities in Ōtautahi Christchurch through these plan changes. For example, the Christchurch City Council could influence climate change resilience, community connectedness, housing affordability and diversity, access to green space and tree cover, and the design of urban environments alongside these proposed changes. Our comments below set out why it is important to influence these other factors.

⁷ Nieuwenhuijsen, M., Khreis, H., & SpringerLink (Online service). (2019;2018;). In Nieuwenhuijsen M., Khreis H.(Eds.), *Integrating human health into urban and transport planning: A framework* (1st 2019. ed.). Springer International Publishing. <https://doi.org/10.1007/978-3-319-74983-9>

⁸ Health in All Policies Team, Te Mana Ora/Community and Public Health (2022). Integrated Planning Guide for a healthy, sustainable and resilient future - version 3.2. Christchurch. New Zealand: Te Whatu Ora

Specific Comments

Meeting Housing Demands: Climate Change

13. Te Mana Ora supports increasing the density of housing and creating more compact urban environments, to meet the needs of the growing population in Ōtautahi Christchurch. As highlighted within the Housing and Business Choice and Heritage Consultation Document, 40,000 more houses will be needed to meet demand in the next 30 years. The growing need for housing, alongside the risks and impacts of climate change need to be carefully considered.
14. The National Adaptation Plan 2022 noted that there is increasing risk to housing from extreme weather events, drought, increased fire weather and sea-level rise.⁹ Climate change is already severely impacting communities in Aotearoa New Zealand as highlighted by recent events, including the damage caused by flooding in Auckland and by Cyclone Gabrielle in Hawke's Bay and Gisborne.
15. Damaged housing and displacement caused by extreme weather events and climate change will impact the existing housing supply, resulting in increased demand and impacting affordability. In Aotearoa New Zealand, about 675,000 people live in flood prone areas and 72,000 people live in areas at risk of storm surges.¹⁰ These numbers will only increase as extreme weather events increase and sea-levels rise, putting additional pressure on housing.
16. Te Mana Ora supports the proposed Qualifying Matters related to high-risk natural hazards, including coastal inundation, coastal erosion and tsunami hazard. Building housing in areas that are at risk of flooding and sea level rise will only compound issues of housing availability and affordability. Therefore, limiting density in high-risk areas and increasing housing density in areas of Ōtautahi Christchurch that are less exposed to climate risks will increase our resilience to climate change and support our housing needs as we experience more extreme weather and greater impacts from climate change around Aotearoa New Zealand.

⁹ Ministry for the Environment. 2022. *Aotearoa New Zealand's first national adaptation plan*. Wellington. Ministry for the Environment.

¹⁰ Ministry for the Environment. 2022. *Aotearoa New Zealand's first national adaptation plan*. Wellington. Ministry for the Environment.

Health Promoting Neighbourhoods: Community Connectedness and Privacy

17. Te Mana Ora recognises the need to plan for and build housing and neighbourhoods that facilitate a sense of community and social connection. Spaces that encourage positive socio-cultural passive or active activity are good for the wellbeing of individuals and for community cohesion. Equally, it is important to consider the need for privacy in housing design and development. Privacy, safety and access to services are all effects that Christchurch City Council can influence through the Housing and Business Choice Plan Change.
18. Housing developments, such as high-rise apartment buildings, can contribute to feelings of social isolation and anonymity.¹¹ Te Mana Ora recommends that Christchurch City Council considers how housing developments can be designed in a way that encourages social interaction. For example, shared spaces, such as green spaces, paths and bike sheds, can facilitate social interaction in housing developments.
19. Te Mana Ora supports the proposed the objective of high-quality residential environments (14.2.5) and the policies under this objective. Te Mana Ora also supports the proposed residential design principle 'site layout and context' (rule 14.15.1).
20. Living in housing that provides visual and physical connectivity to streets and spaces helps people feel present and part of a community. Te Mana Ora notes the proposed controls for street-facing glazing and recommend including a requirement for a percentage of new housing to orientate living spaces to streets and public or shared open space as a rule not only as matter of discretion.
21. Alongside community connectedness, Te Mana Ora notes the importance of a sense of privacy in household design for residents' health and wellbeing. Privacy at home allows space for important personal, cultural and religious practices, as well as space to connect with loved ones and family members.¹² Privacy means that home can be a

¹¹ Nguyen, L., van den Berg, P., Kemperman, A., & Mohammadi, M. (2020). Where do people interact in high-rise apartment buildings? Exploring the influence of personal and neighborhood characteristics. *International journal of environmental research and public health*, 17(13), 4619.

¹² Willems, S., De Smet, H., & Heylighen, A. (2020). Seeking a balance between privacy and connectedness in housing for refugees. *Journal of Housing and the Built Environment*, 35(1), 45-64. <https://doi.org/10.1007/s10901-020-09727-7>

place of retreat and relaxation¹³, whereas a lack of privacy can mean a home environment does not feel safe or secure.¹⁴

22. Additionally, it is important to consider how housing developments can support crime prevention. There are a number of Crime Prevention Through Environmental Design (CPTED) principles that can be included in housing design, such as ensuring that windows and doorways look out on public spaces and the street, making sure trees and shrubs do not block the street view, and ensuring there is appropriate lighting on the street and footpaths.¹⁵ Te Mana Ora supports the proposed changes to the safety section of the residential design principles (14.15.1 h) which strengthen CPTED principles to achieve a safe, secure environment.

Health Promoting Neighbourhoods: Healthy Streets

23. It is also important to consider how neighbourhood design can contribute to social connection and sense of community. Neighbourhoods can influence opportunities for meaningful social interaction, including through the layout of streets, local amenities and public spaces. Places that encourage social interaction are designed to be accessible by all, have destinations for friends to meet, and have 'bumping spaces' for interactions, such as street furniture.¹⁶

24. The Healthy Streets Approach is a useful tool for conceptualising how neighbourhood design can facilitate sense of community and social connection. The Healthy Streets Indicators outline aspects of the human experience of being on streets that should be considered when planning public spaces (Figure 2). Te Mana Ora recommends that Christchurch City Council considers incorporating the Healthy Streets Approach into matters of control and discretion to create places that are vibrant and inclusive, where people feel safe and relaxed and there are things to do and see. Considering how to

¹³ Easthope, H. (2004). A place called home. *Housing, Theory, and Society*, 21(3), 128-138. <https://doi.org/10.1080/14036090410021360>

¹⁴ Easthope, H. (2004). A place called home. *Housing, Theory, and Society*, 21(3), 128-138. <https://doi.org/10.1080/14036090410021360>

¹⁵ Canterbury Safety Working Party. (2004). Safer Canterbury: Creating Safer Communities. Accessed from: <https://www.ccc.govt.nz/assets/Documents/Culture-Community/Community-Safety/CPTEDFull-docs.pdf>

¹⁶ Campaign to End Loneliness. (2023). Tackling Loneliness through the Built Environment. Accessed from: <https://www.campaigntoendloneliness.org/tackling-loneliness/tackling-loneliness-through-the-built-environment/>

make places attractive is also important when rezoning areas of the city, such as industrial areas, which may lack such place-making features.

25. Introducing higher density housing has the potential to put greater pressure on roads and car parking. Te Mana Ora recommends that the Council uses the Healthy Streets Approach to consider how to make walking and cycling more attractive and challenge car dominance. As noted in the Consultation Document, planning decisions have been based on the 'walkable catchments' of commercial centres so enhancing the walkability of Ōtautahi Christchurch should be prioritised.



Figure 2: The Healthy Streets Indicators

Health Promoting Neighbourhoods: Climate Resilience and Green Space

26. Climate resilient communities need access to green spaces to reduce the urban heat island effect, to enable biodiversity, support urban tree cover and provide spaces that encourage community connection and physical activity.
27. Results from the Huihui Mai Engagement showed that many people in Greater Christchurch are open to high density living but that access to green spaces, gardens and green neighbourhoods was a key consideration.¹⁷
28. Te Mana Ora supports the different proposals to support tree cover in the Housing and Business Choice Plan Change Consultation Document, including to update tree setbacks to better protect individual trees and to incentivise more tree planting, Financial Contributions, and the Schedule of Significant and Other Trees becoming a Qualifying matter.
29. Trees are important for climate change mitigation, because trees remove carbon dioxide from the atmosphere, and for climate change adaptation because trees can lower temperatures and can reduce the impacts of stormwater. It is critical that the benefit of trees and green spaces are considered in conjunction with the need for high and medium density housing.
30. Trees, especially old trees, are similar to cultural and heritage sites, they are symbolic of a sense of place, connection, and identifying features of a place. Additionally, access to trees and green spaces has significant impact on a community's wellbeing, their behaviours, and relationship with nature. A recent study showed that residents living in areas with greater tree cover, were much more likely to spend time in public green spaces. Furthermore, trees provide shade and protection from the sun, which is a Healthy Street Indicator.
31. Some neighbourhoods and areas of Ōtautahi Christchurch are already comparatively lacking in tree cover and accessible public green spaces, for example, the tree cover in

¹⁷ Greater Christchurch Partnership. (2023). Huihui Mai: Coming together to make a plan. Accessed from: <https://greaterchristchurch.org.nz/assets/Documents/greaterchristchurch-/Huihui-Mai-Engagement-Summary.pdf>

Linwood is around 8.9% compared with Fendalton which has 19% tree cover.¹⁸ Te Mana Ora strongly supports the draft Urban Forest Plan and recommends that Christchurch City Council considers the areas where trees need to be particularly protected, and also which areas need to be replanted to ensure more equitable access and connections with the environment throughout the city.

32. Te Mana Ora recommends that Christchurch City Council considers establishing new green spaces within housing intensification, to support the growing population of Ōtautahi Christchurch. The uneven distribution of urban green spaces is a significant concern in cities worldwide that have focused on intensifying development. Christchurch City Council has the opportunity to consider how to mitigate this problem before the intensification of development begins.

Residential Heritage Areas

33. Te Mana Ora supports the protection of Residential Heritage Areas and recognises the need to balance housing development with protecting areas of cultural heritage and identity. Engagement with cultural heritage promotes community wellbeing, and these shared spaces support community belonging and identity.¹⁹

Additional comments

Meeting Housing Demands: Affordability

34. Te Mana Ora supports the development of more affordable, health promoting housing in Ōtautahi Christchurch.
35. Te Mana Ora commends Christchurch City Council for their long history of providing social housing for people with serious housing need and recommends Christchurch City Council considers how to ensure sufficient social housing is included in future housing developments.

¹⁸ Law, T. (2022). Time running out to save Christchurch's trees from housing intensification. Stuff News: <https://www.stuff.co.nz/the-press/news/127846951/time-running-out-to-save-christchurchs-trees-from-housing-intensification>

¹⁹ Taçon, P. S., & Baker, S. (2019). New and emerging challenges to heritage and well-being: A critical review. *Heritage*, 2(2), 1300-1315.

36. Te Mana Ora defines social housing as affordable housing for people on low income or with complex needs, which is subsidised by the Government or Local Government, or a non-government organisation (NGO). In December 2022, there were 23,127 applicants on the Housing Register waiting for public housing across Aotearoa New Zealand.²⁰ The demand for social housing, alongside the health and wellbeing impacts of unaffordable, insecure housing, means that is critical for Christchurch City Council to put in place clear plans to provide social housing in Ōtautahi Christchurch within the building intensification plans.

Meeting Housing Demands: Diversity, Quality and Accessibility

37. As stated in the Consultation Document, Christchurch City Council will consider design in the resource consent process. Te Mana Ora recommends that Christchurch City Council uses the resource consent process to improve the design of new housing developments, including attention to universal design (see paragraph 42) and good ventilation (see paragraph 41).

38. While these proposed plan changes will enable more housing and MDRS Policy 1 (14.2.3.2) enables “a variety of housing types with a mix of densities within the zone, including 3-storey attached and detached dwellings, and low-rise apartments”, Te Mana Ora encourages Christchurch City Council to consider how to ensure this will be achieved and how increased density and subdivision will provide diversity of housing stock that caters to range of population groups with different needs. Providing a diversity of housing stock and a mix of residential densities can give everyone more choice about where to live.

39. New housing developments should cater to a range of household sizes.

Intergenerational living is common among Pacific communities which means housing stock in Aotearoa New Zealand is often unsuitable for this population group.²¹ While there are social and cultural benefits of intergenerational living, overcrowded housing

²⁰ Ministry of Social Development. (2023). Housing Register. Accessed from: <https://www.msd.govt.nz/about-msd-and-our-work/publications-resources/statistics/housing/housing-register.html>

²¹ Stats NZ. (2023). Aotearoa's housing often unsuited to Pacific families. Accessed from: <https://www.stats.govt.nz/news/aotearoas-housing-often-unsuited-to-pacific-families/>

can have negative impacts on physical health. Providing housing for a range of household sizes will create more opportunities for large households to live in healthy, suitable and secure housing.

40. Te Mana Ora supports the inclusion of the conditions for managed consents for increased heights beyond those enabled within medium and high-density zoned area (14.2.3.7), including that provision for “a greater variety of housing types, price points and sizes when compared to what is provided in the surrounding area” (14.2.3.7 i), and encourages Christchurch City Council to investigate ways to apply these to enabled development as well.
41. Indoor air quality should also be considered in housing design. Poor ventilation in building design increases the likelihood of airborne disease transmission, especially in overcrowded environments. Building houses that have good ventilation can improve indoor air quality and protect health, such as by reducing transmission of respiratory illnesses including COVID-19, influenza and tuberculosis.²² Good ventilation protects against build-up of harmful substances such as carbon dioxide. This is a health issue which has not been adequately considered in residential buildings till now.
42. A universal design approach to housing design makes housing accessible for people at any stage of life and with different abilities. Universal design standards accommodate people who use wheelchairs or other mobility aids, people with impaired vision and people who are elderly or very young. Housing that incorporates universal design features will be less likely to need to be modified to suit people with different needs, and therefore can be marketed to a wider audience. While the need for universal design could be added to Policy 14.2.2.6 – Provision of housing for aging population, it is applicable to a much wider range of people. Universal design standards should also be applied to new streetscapes and buildings so that they are accessible for all people.

²² Bennett, J., Shorter, C., Kvalsvig, A., Barnard, L. T., Wilson, N., Crane, J., ... & Howden-Chapman, P. (2022). Indoor air quality, largely neglected and in urgent need of a refresh. *The New Zealand Medical Journal* (Online), 135(1559), 136-139.

43. Disabled people on the waitlist for public housing in Aotearoa New Zealand who are looking for accessible housing wait 90 days longer than non-disabled people.²³ The average wait time for people who have requested a modified house is 434 days. This confirms the need for more housing following universal design standards. Te Mana Ora recommends that Christchurch City Council considers how to ensure that new housing is both accessible and affordable.

44. Te Mana Ora recommends that accessibility plans be required to support quality large scale developments (Policy 14.2.5.3) and other high-density developments or neighbourhoods so that local accessibility needs are understood and provided for.

Conclusion

45. Te Mana Ora does not wish to be heard in support of this submission.

46. If others make a similar submission, the submitter will not consider presenting a joint case with them at the hearing.

47. Thank you for the opportunity to submit on proposed Heritage Plan Change (PC13) and Housing and Business Choice Plan Change (PC14).

Ngā mihi,



Vince Barry

Regional Director Public Health Te Waipounamu
National Public Health Service

²³ Shivas, S. (2023). People who need modified public housing have to wait three-months longer than non-disabled, MSD data reveals. Stuff. Accessed from: <https://www.stuff.co.nz/life-style/homed/houses/131850774/people-who-need-modified-public-housing-have-to-wait-threemonths-longer-than-nondisabled-msd-data-reveals>

Details of submitter No: 191 - Logan Brunner

Submitter:	Logan Brunner
Submitter Address:	

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 03/05/2023

First name: Logan

Last name: Brunner

Preferred method of contact Email

Postal address:

Email:

Daytime Phone:

Would you like to present your submission in person at a hearing?

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Person of interest declaration: I am *

Explain the grounds for saying you come within category (a) or (b) above:

Note to person making further submission:

- A further submission can only support or oppose an original submission listed in the summary. It is not an opportunity to make a fresh submission on matters not raised in the submission.
- A copy of your further submission must be served on the original submitter within 5 working days of making the further submission to the Council

Consultation Document Submissions

Provision: Chapter 13 Central City

Seek Amendment

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

We oppose all changes to heritage areas.

My submission is that:

We oppose all changes to heritage areas. The PC13 changes represent a considerable expansion in number and area heritage precincts. These heavily restrict people from building more housing and are often located in parts of the city with the best street grids for livable intensification. The council claims that the number of properties is low, but this is concealing the large lots and large land area these areas consume, and proximity to amenities. The council should consider keeping the amount of heritage area fixed, adding more if they please, but removing other areas deemed to be of the lowest value.

Heritage or character value should not be used as a reason to protect housing that is not up to standard. These designations are often removed from the reality of the value that these houses actually provide to their residents. The aesthetic value of these houses should not trump the need of residents to live in comfortable, safe, and healthy homes. What is the point of housing if not to provide those qualities?

Provision: Chapter 14 Residential**Support**

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

My submission is that:

More homes, with 3-storey, 3-homes per site the new norm (however, we oppose it being subject to Sunlight QM).

Relevant clause: 14.2.6.

Moving towards suburban areas where denser housing is the norm, provided by a range of different house types such as townhouses or low-rise apartments, will have beneficial effects on our urban environments. There are numerous benefits that come with denser suburban housing, particularly reduced housing costs, reduced urban emissions, decreased infrastructure costs, and improved community connectivity/safety. These benefits are further explained in the attached 'Benefits of Density' document.

Provision: Chapter 14 Residential**Support**

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

My submission is that:

Taller buildings allowed, especially central city (20-30 lvs). Commercial centres and surrounding residential sites have increased height limits, generally to between 4 and 6 storeys.

Relevant clause: 14.2.7.

This will result in more homes, more economic activity, more vibrant communities, and more economical public transport and other infrastructure upgrades. These benefits are further explained in the attached 'Benefits of Density' document.

Provision: Chapter 14 Residential**Support**

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

My submission is that:

Perimeter-block form-factors encouraged in high-density neighbourhoods – eyes on the street

Relevant clause: 14.6.2.2.c.iv.

The removal of recession planes for buildings below 14 m within the HRZ, provided the building is within 20 m (or 60% of site depth) of the front boundary, is a positive change. This is a clear recognition of the idea of 'eyes on the street', where a street is made safer by placing houses closer to the road boundary. With more people living in these houses in high-density neighbourhoods, this benefit will only increase.

Provision: Chapter 14 Residential**Seek Amendment**

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

Amend to previously proposed levels or oppose entirely.

My submission is that:

Sunlight access QM.

Relevant clause: 14.5.2.6.a (Medium density) and 14.6.2.2.a (High density).

The council's claim that 96% of housing capacity is retained under the Sunlight Access QM is misleading. CCC's Impact Assessment on the Sunlight Access QM only includes the effect on RS zones transitioning to MRZ. This ignores the impact on areas zoned as RMD that are transitioning to MRZ, or areas zoned HRZ. RMD and HRZ sites are more impacted by recession planes than RS, given they tend to be smaller. The example RS site, that is used to demonstrate the supposed loss in capacity, is 750 m². More than 50% of RMD sites and 2/3 of HRZ sites are less than 700 m². This means that the impact of applying recession planes is much more severe than for RS sites. Using an RS site as an example hides a much greater loss in housing capacity. We oppose the Sunlight Access QM on this basis, given it will result in a much greater loss in housing capacity than anticipated.

We think that the broad application of the Sunlight Access QM across the city is disappointing and counterproductive. This broad application contradicts the intention of the MDRS, which was to allow 3-storey, 3-unit development across all urban areas in New Zealand. We also believe that amenities other than sunlight should have been considered. NPS-UD Policy 6(b)(ii) states that the significant changes to built form required "... may detract from amenity values appreciated by some people but improve amenity values appreciated by other people, communities, and future generations, including by providing increased and varied housing densities and type". This perspective should have been considered by the council when implementing the Sunlight Access QM. If increased sunlight access results in decreased housing affordability, as well as decreased access to employment, services, and amenities, is it really worth it?

Provision: Chapter 14 Residential**Seek Amendment**

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

Amend, reduce proposed area back to current size of 40 houses.

My submission is that:

Riccarton bush interface – limits buildings in this area to 8m.

Relevant clause: 14.5.2.3.v and 14.4.2.3.iv (2 clauses as this area is currently covered by two different zones that will merge into MRZ).

If wanting to reduce area, refer to 'PC14 Planning Maps 31' under 'Maps' section in submission.

We disagree with the extension of the Riccarton Bush interface. Allowing more houses in the Riccarton Bush area does not reduce the amenity but shares it. The danger of including this QM is that it solely benefits existing wealthy homeowners who can afford to live in the area by keeping house prices close to the Bush at unobtainable levels. The extension of the interface is justified by a desire to maintain views of the Bush from streets in the area. This mostly amounts to views of distant treetops, largely indistinguishable from the various street-trees and private plantings. The true amenity of the Bush is in its accessibility from the surrounding area, especially given it is intersected by the Uni-Cycle MCR. This accessibility would only be increased if more people were permitted to live within the general vicinity of the Bush, and as such the amenity provided by the Bush would increase.

The application of the Riccarton Bush interface is at odds with the NPS-UD. NPS-UD allows for QM to restrict development in "open space provided for public use, but only in relation to the land that is open space" (NPS-UD 2020 3.32 1 (d)) or "an area subject to a designation or heritage order but only in relation to the land that is subject to the designation or heritage order" (NPS-UD 2020 3.32 1 (e)). This QM is applying density control to sites not included in the protected extent of either Riccarton Bush, nor the surrounding grounds of Riccarton House, nor land zoned as open space. The Section 32 report mentions that solely limiting the interface to adjoining sites (rather than the much greater area proposed in the QM) would have the effect of "...ensuring that Riccarton Bush is protected from the effects of medium density development" and that "the values of Riccarton Bush itself would not be degraded", and "this approach is effective at addressing the issue". This option should have been implemented in the QM, rather than the expansive area that is currently proposed.

Provision: Chapter 14 Residential**Seek Amendment**

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

The Low Public Transport Accessibility Qualifying Matter should be removed from the proposal because the criteria used to identify its spatial extent is arbitrary and prevents strategic growth in areas served by decent and improving PT routes.

My submission is that:

Low PT access areas – based on existing PT. This is the wrong way to think about this

Relevant clause: 14 (all sections are cited in QM documentation).

The Low Public Transport Accessibility Qualifying Matter should be removed from the proposal because the criteria used to identify its spatial extent is arbitrary and prevents strategic growth in areas served by decent and improving PT routes. Should an entire area really be precluded from all future development solely on the basis that it is not currently served by a core public transport route? A lack of public transport access is a manufactured reason to not allow density, as it unnecessarily limits density due to inadequate planning on the part of the regional council. It also ignores different measures of accessibility to amenities, beyond public transport use. Better measures of city-wide accessibility should have been used, rather than the simple model used by the council in their analysis. Given the promotion of active public transport by the council, why was this mode not considered in their analysis of accessibility for the QM?

Provision: Chapter 14 Residential

Seek Amendment

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

Remove entirely or relax recession planes for buildings in HRZ.

My submission is that:

Restrictions on buildings above 14 m. This defeats the purpose of NPS-UD by making it much less attractive for developers to build denser apartment-style buildings.

Relevant clause: 14.6.2.2.b (Clause that dictates that recession planes still apply on parts of buildings above 12 m).

Buildings in the HRZ are overly constrained by the rules for recession planes, setbacks, height limits, and building separation. In areas with older sites (e.g Riccarton, Papanui, city centre), the smaller than average site width combined with the aggressive rules means that a 5-storey house is largely not permitted. Given that units taller than 3-stories require additional investments (fire safety controls, lifts), this effectively limits feasible development in some HRZ areas to 3-storeys. Even on sites where the width is equal to the city-wide average width of 20 m, the width of the 5th floor of a building is limited to just 6 m. This reduces the feasibility of building 5-storey units. The rules for buildings in the HRZ are unnecessarily harsh, with the unintended consequence of promoting 3-storey houses over higher-density developments.

Higher density areas allow more people to live closer to key bus routes, employment, services and amenities. These benefits will be mitigated by the harsh recession planes detailed in 14.6.2.2.b, which make it more financially feasible for developers to build 3-storeys than the intended higher density. Given that the council accepts that areas like Riccarton should be allowed to build taller than 3-storeys, then why are these rules applied in a way that limits development to just 3-storeys? These rules are at-odds with the direction of the NPS-UD, and as such we believe that they should be relaxed or removed entirely.

Details of submitter No: 206 - Emma Wheeler

Submitter:	Emma Wheeler
Submitter Address:	

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 03/05/2023

First name: Emma

Last name: Wheeler

Preferred method of contact Email

Postal address:

Email:

Daytime Phone:

Would you like to present your submission in person at a hearing?

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Person of interest declaration: I am *

Explain the grounds for saying you come within category (a) or (b) above:

Note to person making further submission:

- A further submission can only support or oppose an original submission listed in the summary. It is not an opportunity to make a fresh submission on matters not raised in the submission.
- A copy of your further submission must be served on the original submitter within 5 working days of making the further submission to the Council

Consultation Document Submissions

Provision: Chapter 14 Residential

Oppose

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

Make both St James Avnue and Windermere Road category 1 Streets, protecting both the plaques, trees and the people the already enjoy and use these streets. Removing both streets from the intensification plan.

My submission is that:

I would like both St James Avenue and Windermere Road to be removed from the housing intensification plan.

With the recent rebuild and extension of the Budda Rest Home and the expansion of Te Ora Hou Otautahi, traffic has significantly increased and parking has decrease.

It also needs to be taken into account that many parents park at the beginning of Windermere Road and St James Avenue at the beginning (8:15am – 8:40am) and the end (2:45pm-3:30pm) of the school day, children walk and scooter along Windermere Road both to and from school.

The planned housing intensification would only increase the traffic flow eve more and could make the streets a hazard.

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 03/05/2023

First name: Emma

Last name: Wheeler

Preferred method of contact Email

Postal address:

Email:

Daytime Phone:

Would you like to present your submission in person at a hearing?

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Person of interest declaration: I am *

Explain the grounds for saying you come within category (a) or (b) above:

Note to person making further submission:

- A further submission can only support or oppose an original submission listed in the summary. It is not an opportunity to make a fresh submission on matters not raised in the submission.
- A copy of your further submission must be served on the original submitter within 5 working days of making the further submission to the Council

Consultation Document Submissions

Provision: Chapter 9 Natural and Cultural Heritage

Support

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

Make both St James Avnue and Windermere Road category 1 Streets, protecting both the plaques, trees and the people the already enjoy and use these streets. Removing both streets from the intensification plan.

My submission is that:

We support the protection of the war memorial streets. New Zealand men and women sacrificed their lives to defend Aotearoa.

Freedom and stability in this region are a luxury Kiwis have enjoyed for some time, but let's not kid ourselves, it has come at a cost which cannot be measured and certainly should not be forgotten.

It would be all to easy to rezone our war memorial streets to suit the current fashion of urban intensification, this we understand, but in the rush to reinvent the wheel should we pause and genuinely reflect the price of

freedom we have today?

Respect for the fallen should not be taken lightly nor be politicised. These are war memorial streets which belong to proud Cantabrian's who remember.

Lest we forget.

Details of submitter No: 225 - Michael Dore

Submitter:	Michael Dore
Submitter Address:	

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 04/05/2023

First name: Michael

Last name: Dore

Preferred method of contact Email

Postal address:

Email:

Daytime Phone:

Would you like to present your submission in person at a hearing?

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Person of interest declaration: I am *

Explain the grounds for saying you come within category (a) or (b) above:

Note to person making further submission:

- A further submission can only support or oppose an original submission listed in the summary. It is not an opportunity to make a fresh submission on matters not raised in the submission.
- A copy of your further submission must be served on the original submitter within 5 working days of making the further submission to the Council

Consultation Document Submissions

Provision: Chapter 14 Residential

Oppose

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

My submission is that:

Areas for development above 12 meters should not be intermingled in existing residential areas. They should be restricted to the inner city area or in blocks together where there is much unused land and where that development was originally planned following the Christchurch earthquakes. Tall buildings inter laced with traditional residential housing will always create disharmony distrust and break up communities who have often lived on one site for many years.anded approach is like hitting a tack with a sledgehammer.

Riccarton House and Bush is the oldest area of Christchurch and interlaced with so much of the city's history. The Bush area is already designated a heritage site. To provide further protection to this historical asset a buffer zone of surrounding streets should qualify as low density with height restrictions in current and future planning and resource consents should remain mandatory. It is vital and very necessary to respect and acknowledge the area as important to the heritage of Christchurch.

The History, Character and Heritage of our City of Christchurch should be protected at all costs. If we allow the government to adopt their one size fits all greater intensification strategy we will have let down our future generations. It seems the easiest option to adopt and most importantly fails to consider and respect the lives and the health of the people and the investment they have made who already live in the areas most affected. The heavy-handed approach is like hitting a tack with a sledgehammer.

One size does not fit all. How can you compare Auckland or Wellington with Christchurch when the topography is so different. Allowing new buildings of the proposed heights will create shaded areas for existing houses which will affect people's mental health and wellbeing.

I strongly object to the intensification of residential land. The Governments heavy handed approach is already creating disharmony which will only get worse. One size does not fit all. How can you compare Auckland or Wellington with Christchurch when the topography is so different. Allowing new buildings of the proposed heights will create shaded areas for existing houses which will affect people's mental health and wellbeing. It should not be too difficult to find sufficient pockets of land including in the central City itself to allow greater intensification to satisfy additional demands for housing and protect existing communities.

Details of submitter No: 1013 - Simon and Judith Adamson and Hudson

Submitter:	Simon and Judith Adamson and Hudson
Submitter Address:	<div></div>

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 10/05/2023

First name: Simon

Last name: Adamson

Postal address:

Email:

Daytime Phone:

Would you like to present your submission in person at a hearing?

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Consultation Document Submissions

Provision:

Not Stated

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

Provision: Designation of Chester St East as a Residential Heritage Area

Decision Sought: To move an amendment extending the Residential Heritage Area boundaries for Chester St East to encompass the whole street.

My submission is that:

Amendment requested as below (see attachment)

SUBMISSION TO: The Christchurch City Council

ON: Draft Heritage Plan Change

BY: Dr Simon Adamson and Ms Judith Hudson
Residents of Chester Street East

CONTACT: [REDACTED]

We are writing in support of the proposed Residential Heritage Area for Chester St East/Dawson's Street and further submit that this should be extended to include the full length of Chester St East.

We were delighted when councillors voted in support of an amendment in September 2022 to expand the Chester St heritage area to include the entirety of Chester St. We support the council's subsequent decision to vote against the central government-imposed planning rules. Our understanding is that this had the unfortunate effect of nullifying the Chester St extension amendment. We ask that councillors maintain consistency with their earlier decision to recognise Chester St East as a coherent whole and pass a similar amendment giving effect to the expanded Residential Heritage Area.

Prior to our family moving to our Chester St East home in 2020 we had the pleasure of taking part in a guided historic walk of the Avon/Chester area as part of the CCC's Central Neighbourhood Walks Programme. The walk was led by documentarian and local resident Gerard Smyth while the overall programme was coordinated by Dr Jessica Halliday, architectural historian who also joined us. One of the speakers made the point that Chester St East was an exemplar of high-density central living, containing a mix of housing types, suiting larger and smaller family or social groups, providing a home for people across a range of socio-economic status and age groups. This is one example of Chester St East operating as a community, and very much included the eastern quarter of the street which we are advocating to be treated as part of that community by the RHA proposal.

We have read Dr McEwan's draft Chester Street Area Report and are strongly supportive of the proposal to preserve the heritage value of this special community. Chester St East is more than just a collection of historical and in many cases well preserved homes. As a socially mixed high-density living community it is a time capsule of past ways of living as well as an exemplar of how we can configure our communities to be socially inclusive, environmentally sustainable and promoting of the wellbeing of our community.

Whilst we appreciate that the Eastern quarter of Chester St East lacks the same density of historic structures it makes no sense to us that this part of the Chester St East community should be amputated from the body of the street as a whole.

A RHA encompassing Chester St East in its entirety would provide a link through to the seven properties at 173 Chester St East and the remaining three-story brick building previously at the rear of the Crichton Cobbers building, which we assume is part of the historic Wards Brewery site. Although this main character building (Crichton Cobbers) facing onto the most eastern end of Chester St East was demolished following the 2011 earthquake, the memory of this building remains for those in the community and for many in Christchurch at large. Any future development of 177 Chester St East on the resulting vacant lot to the immediate south of this remaining building requires

council consent as a restricted discretionary activity. This is a reflection of the historically and aesthetically sensitive nature of the location.

Extending the proposed RHA to encompass all of Chester St East would place Chesterfields at the heart of this designated area, rather than on the periphery and links to Fitzgerald Ave and the Englefield RHA.

Yours sincerely,

Dr Simon Adamson

Ms Judith Hudson

April, 2023

Details of submitter No: 1014 - Susan Parle

Submitter:	Susan Parle
Submitter Address:	

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 10/05/2023

First name: Susan

Last name: Parle

Postal address:

Email:

Daytime Phone:

Would you like to present your submission in person at a hearing?

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Consultation Document Submissions

Provision:

Not Stated

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

Provision: This submission is the Christchurch City Council reaffirm the amendment it passed in September 2022 that the special heritage of Chester Street East include the whole street not just 3/4 of the street.

Decision Sought: The whole of Chester Street East is included in the special residential heritage area not just part of the street.

My submission is that:

We support the CCC in its intention to preserve and enhance areas of special heritage and believe whole streets should be included in the plan and not dividing a street and community. Excluding a small part of the street in September 2022 does not make sense when the whole street has special character with mature trees and some lovely older homes. A special dwelling in the excluding area is the seven properties at 173 which have been beautifully restored and added character to the street. In the 1980s the CCC made the decision to narrow Chester Street East and plant the trees. This was planned for other inner city streets but this never happened and now it seems a shame that the current council is willing to let the character be destroyed by removing part of the street from the Residential heritage plan.

Details of submitter No: 1015 - Mary Crowe

Submitter:	Mary Crowe
Submitter Address:	

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 10/05/2023

First name: Mary

Last name: Crowe

Postal address:

Email:

Daytime Phone:

Would you like to present your submission in person at a hearing?

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Consultation Document Submissions

Provision:

Not Stated

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

Provision: Heritage protection designation

Decision Sought: There are a significant number of historic buildings all along this street that should be protected for future generations.

My submission is that:

The complete length of Chester Street East should receive heritage protection zoning.

Details of submitter No: 1016 - Emma Norrish

Submitter:	Emma Norrish
Submitter Address:	
Organisation:	Waipapa Papanui-Innes-Central Community Board

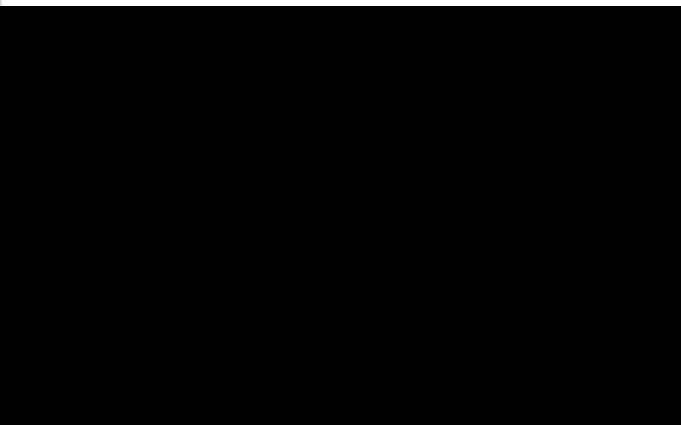
Our proposed Heritage Plan Change (PC13)

Submitter Details

First name: Emma **Last name:** Norrish
Organisation: Waipapa Papanui-Innes-Central

Community Board

On behalf of:



Gain an advantage in trade competition through this submission

I am not

directly affected by an effect of the subject matter of the submission that :

a. adversely affects the environment, and

b. does not relate to the trade competition or the effects of trade competitions.

Note to person making submission:

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991

Would you like to present your submission in person at a hearing?

☒ Yes

☐ I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Additional requirements for hearing:

Consultation Document Submissions

- ☐ Support
- ☐ Oppose
- ☐ Seek Amendment

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area

Provision: Residential Heritage Areas

Decision Sought: The Board appreciates comment in the consultation document that the Council assessed many other areas of Christchurch against the criteria used for identification as a Residential Heritage Area that did not meet the required threshold. However, the Board seeks that the Council ensures the required threshold could not be met as the reason for not accepting its above submissions, or otherwise seeks the relevant extensions to Residential Heritage Areas.

My submission is that

The Board supports the Residential Heritage Areas, and would continue to recommend additional areas be considered for inclusion, for example, and not limited to, Dover Street (original workers' cottages of historical significance). The Board acknowledges the sense of place and history that individuals and neighbourhoods identify with and associate with their local community. As such, the Board implores the Council to seriously consider any additional suggestions of historical significance that are received through this process. While the Board is supportive of the proposal to protect Residential Heritage Areas it wishes to highlight the impact of two such areas close together with a small high density zone between them will take away the aesthetics of both areas. The Board is referring to Chester Street East which has one end in a Residential Heritage Area, the other end (at Fitzgerald Avenue) is high density, and then on the opposite side of Fitzgerald Avenue there is the Englefield Avonville Residential Heritage Area. The Board asks that whole streets are incorporated in Residential Heritage Areas to give the community a sense of continuation. The Board also suggests that provision should be made for interim protection of areas and sites with potential heritage values to allow time for necessary in depth investigation to be undertaken before their values are undermined or lost by inappropriate development.

Attached Documents

File
No records to display.

17 April 2023

Christchurch City Council

By online submission to 'Have your say' page

Papanui Service Centre
5 Restell Street
Christchurch 8013

PO Box 73024
Christchurch 8154

ccc.govt.nz

Tēnā koe,

Waipapa Papanui-Innes-Central Community Board Submission on Proposed Heritage Plan Change (PC13)

1. Introduction

The Waipapa Papanui-Innes-Central Community Board ('the Board') thanks the Council for the opportunity to submit on PC13. It does so in accordance with its role to represent, and act as an advocate for, the interests of its community in the Papanui-Innes-Central area.

The Board does wish to be heard in support of its submission.

2. Submission

Question	Submission
The specific provisions of the plan change that my submission relates to are as follows.	Residential Heritage Areas
My submission is that	<p>The Board supports the Residential Heritage Areas, and would continue to recommend additional areas be considered for inclusion, for example, and not limited to, Dover Street (original workers' cottages of historical significance).</p> <p>The Board acknowledges the sense of place and history that individuals and neighbourhoods identify with and associate with their local community. As such, the Board implores the Council to seriously consider any additional suggestions of historical significance that are received through this process.</p> <p>While the Board is supportive of the proposal to protect Residential Heritage Areas it wishes to highlight the impact of two such areas close together with a small high density zone between them will take away the aesthetics of both areas. The Board is referring to Chester Street East which has one end in a Residential Heritage Area, the other end (at Fitzgerald Avenue) is high density, and then on the opposite side of</p>

	<p>Fitzgerald Avenue there is the Englefield Avonville Residential Heritage Area.</p> <p>The Board asks that whole streets are incorporated in Residential Heritage Areas to give the community a sense of continuation.</p> <p>The Board also suggests that provision should be made for interim protection of areas and sites with potential heritage values to allow time for necessary in depth investigation to be undertaken before their values are undermined or lost by inappropriate development.</p>
I seek the following decision from the Council	<p>The Board appreciates comment in the consultation document that the Council assessed many other areas of Christchurch against the criteria used for identification as a Residential Heritage Area that did not meet the required threshold. However, the Board seeks that the Council ensures the required threshold could not be met as the reason for not accepting its above submissions, or otherwise seeks the relevant extensions to Residential Heritage Areas.</p>
I am seeking that Council make changes to a specific site or sites	<p> <input checked="" type="radio"/> Yes <input type="radio"/> No </p> <p>As noted above Dover Street, and eastern end of Chester Street East.</p>

Nāku noa, nā



Emma Norrish
 Chairperson
 Waipapa Papanui-Innes-Central Community Board

Details of submitter No: 1017 - Jayne Smith

Submitter:	Jayne Smith
Submitter Address:	

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 10/05/2023

First name: Jayne

Last name: Smith

Postal address:

Email:

Daytime Phone:

Would you like to present your submission in person at a hearing?

Yes

Additional requirements for hearing:

Consultation Document Submissions

Provision:

Not Stated

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

Provision:the Heritage Plan Change 13, the RHA is related to an area collectively telling a story that has been chosen to be kept as such for the narrative of Ōtautahi. I live in Wigram Skies Caudron Road, and as such these Airforce housing has now become part of the historical narrative of Ōtautahi, although everything else around them has changed significantly. The concerns that I have is with the ever changing environment and the development of new techniques that can be used to build, power and contribute to a better sustainable city may not be able to be applied to our homes. I am a home owner that would like to have the opportunity and be included in sustainable practices, but not at a cost due to heritage value that we cannot be part of contributing to a better city. On reading the qualifying matters it is just a bunch of words, and there is nothing specific in there to indicate what will actually be considered. I don't believe it is unreasonable that home owners in RHA cannot help contribute to the kaitiaktaka of the environment and whenua and benefit socially by knowing they are doing so. Examples are but not limited to: cladding on the house for insulation and for cooling considering our year is going to just get warmer overall, solar panels, wind power, water capture, double glazing windows, different roofs or any new innovation that may yet to be developed. I am also concerned with there now a heritage aspect on our home, how does this work with the costings on maintenance and repairs. Will we only be able to use heritage builders and will this mean all repairs will be at a greater cost as they will need to be registered heritage/historic builders. Will this adjustment in and of itself be a disadvantage to the home owners. As this seems unreasonable and also ties in with the point above on the ability to access new innovations and developments to better our homes for the greater good.

Decision Sought:I would like to see that we are not disadvantaged with any enhancements we could do to our homes around sustainable practices, or new innovations nor any disadvantages in maintenance or repairs to our homes because they sit in a different category to other home owners. it is important that as home owners we too can benefit socially, financially and also by knowing we are part of a bigger picture for Ōtautahi, Aotearoa and the world by doing our part for the planet and our environment. One of the reasons we chose our home is because of the history it holds and have huge respect for the sacrifice the whānau living in them and what their loved ones gave when they went overseas for our country, and for the lifestyle we have now. As such our home has stayed true to its original look however we do not want to not be able to make changes to help our planet and the growing costs of living we are all facing.

My submission is that:

I support the changes as I do believe we need to remember our past, so we can be in the present and learn for the future. However, when we purchased our home there were not indications that this would occur to a residential area that would place potential limitations or possibly more challenges onto the owners, which will come at the owners cost. I am also concerned about the lack of clarity on examples of what qualifying matters would be considered and what rules would then be applied. my reason for my view is

that it is deemed unreasonable that as a rate payer in Ōtautahi I would be excluded or be in a special group when it comes to making improvements that enhance sustainability which will change the look of the house ie solar panels, water capture tanks. It is unreasonable that this could come at an extra cost for us due to the caveats that are part of the RHA expectations. Such as the look from the road can not change. When in fact changes have already occurred throughout the neighbourhood. The other aspect is, depending on the view from the road some home owners maybe able to make certain changes but others would be unable to due to breaking this rule. An example would be someone living on the corner and has two sides that are viewed from the road. Lastly, when a building has been made of heritage value there is already an understanding and this can often add value to the building because it is now viewed differently, and potential buyers will often buy knowing this. We have not had this opportunity the decision has been made and applied, yes there are some benefits but when selling our homes those benefits could also work against us which could diminish the value of our properties. As the potential for development has been removed for example a home on the back, upgrading to more sustainable living.

Details of submitter No: 1019 - Julie Florkowski

Submitter:	Julie Florkowski
Submitter Address:	

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 10/05/2023

First name: Julie

Last name: Florkowski

Postal address:

Email:

Daytime Phone:

Would you like to present your submission in person at a hearing?

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Consultation Document Submissions

Provision:

Not Stated

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

Provision:1: That the Residential Heritage Areas of Otautahi, Christchurch, deserve special protection as part of their unique contributing identity to this city (PC13) and 2: That these areas should be become Qualifying Matters under the Housing and Business Choice Plan Change (PC14).

Decision Sought:I support the proposal that the current Residential Heritage Areas of Otautahi, Christchurch (specifically, Alpha Avenue and as listed in Appendix 1) should have their status amended to ""highly significant status"" (PC13) and therefore be afforded further protection as proposed by the ""Qualifying Matters under the Housing and Business Choice Plan Change"" (PC14).

My submission is that:

We note that the 16 Papanui War Memorial Avenues including Alpha Avenue have been accorded 'highly significant' status; elevating their recognised status as a memorial street, the title originally being granted in 1947. The streets, plaques and trees contribute to the unique identity of this part of Papanui. They help to preserve the cultural and spiritual heritage of not just the past but also of the current local community. As long term (31+ years) residents of Alpha Avenue, I contend that stringent efforts should be made to preserve the heritage of the memorial avenues. I have strictly observed this during any renovations that we have undertaken over the duration of my tenure, careful to conserve the original character of our home. Densification would undermine the heritage and aesthetic values of these distinctive areas. I strongly support any initiative that protects the recognised Residential Heritage Areas of Otautahi, Christchurch.

Details of submitter No: 1020 - Chris Florkowski

Submitter:	Chris Florkowski
Submitter Address:	

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 10/05/2023

First name: Chris

Last name: Florkowski

Postal address:

Email:

Daytime Phone:

Would you like to present your submission in person at a hearing?

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Consultation Document Submissions

Provision:

Not Stated

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

Provision:1: That the Residential Heritage Areas (and additional specified heritage items) of Otautahi, Christchurch, deserve special recognition as part of their unique contributing identity to this city (PC13) 2: That these should be Qualifying Matters under the Housing and Business Choice Plan Change (PC14).

Decision Sought: I support the proposal that the current Residential Heritage Areas of Otautahi, Christchurch (including Alpha Avenue and as listed in Appendix 1) should be accorded recognition as ""Qualifying Matters"" under the Housing and Business Choice Plan Change (PC14).

My submission is that:

We note that the 16 Papanui War Memorial Avenues including Alpha Avenue have been recognized as 'highly significant' consistent with their status as memorial avenues, originally accorded in the 1940s. The streets, including plaques and trees contribute to the unique identity of this part of Papanui. They help to preserve the cultural and spiritual heritage of the local community. As a long term (31+ years) resident of Alpha Avenue, I advocate that stringent efforts should be made to preserve the heritage of the memorial avenues. I have strictly observed this during any renovations that we have undertaken over the duration of our tenure, careful to conserve the original character of our home. Densification would undermine the heritage and aesthetic values of these distinctive areas. I strongly support any initiative that protects the Residential Heritage Areas of Otautahi, Christchurch.

Details of submitter No: 1021 - Matty Lovell

Submitter:	Matty Lovell
Submitter Address:	

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 10/05/2023

First name: Matty

Last name: Lovell

Postal address:

Email:

Daytime Phone:

Would you like to present your submission in person at a hearing?

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Consultation Document Submissions

Provision:

Not Stated

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

Provision: I am strongly in favour to PC 13. I live on St James Ave which is a lovely tree lined street which is also a war memorial st which host an ANZAC day parade. This area is helps create the special identity for Ōtautahi Christchurch and recognition of those that made the ultimate sacrifice for us to live here. That should be recognised by the heritage protection of the street, trees and plaques. I am very proud of New Zealand's efforts in WWII I had family members involved in the war, and I now take my children to the ANZAC parade every year in honour of those that we lost to help protect this Country, City and neighbourhood I call home. We moved to this area 5 years ago, and the idea that we now reside on a living memorial to our fallen soldiers is extremely close to my heart, and they are to all those in the Christchurch area and that heritage needs to be protected. Additionally this street is lined with beautiful large and growing trees, these add to the character, charm and heritage of the area and the memorials.

Decision Sought: Plan 13 goes ahead and St James ave is protected under the heritage plan.

My submission is that:

Plan 13 goes ahead and St James ave is protected under the heritage plan.

Details of submitter No: 1022 - Bosco Peters

Submitter:	Bosco Peters
Submitter Address:	

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 10/05/2023

First name: Bosco

Last name: Peters

Postal address:

Email:

Daytime Phone:

Would you like to present your submission in person at a hearing?

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Consultation Document Submissions

Provision:

Not Stated

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

Provision: The whole of Chester Street East be recognised as having special heritage character - to exclude some of this street threatens the special nature of the whole street.

Decision Sought: That Council recognises the whole of Chester Street East as having special heritage character.

My submission is that:

Excluding the Eastern quarter of Chester Street East from the proposed Residential Heritage Area threatens the cohesion of the area, relegates Chesterfields to the edge of the community rather than being its heart....Separating the nature of the Eastern quarter of Chester Street East from the rest of the street threatens to undermine the uniqueness of the whole street with issues of excess traffic flow, parking, and other problems. Such a recognition of Chester Street East as a whole by The Christchurch City Council continues the visionary planning of the Council in 2022, previous years and decades, and builds on the passion of and partnership with the local residents, and continues the encouragement of the residents and owners in this partnership of enhancing the special character and also the green nature of this part of our Garden City. This submission is not about discouraging inner city living – quite the opposite: the neighbourhood of the whole of Chester Street East and Dawson Street, centring on Chesterfields (rather than seeing that park as being on the edge of the neighbourhood) is an excellent example of the benefits and sense of community of inner city living. The City Council's decision to wisely include the whole of Chester Street East in preserving and enhancing areas of special heritage and character will leave a legacy for current and future generations to flourish in our city.

SUBMISSION TO: The Christchurch City Council

ON: Heritage Plan Change

BY: Bosco & Helen Peters – Owners in and Residents of Chester Street East

CONTACT:



Kō ngā tahu ā ō tapuwai inanahi, hei tauira mō āpōpō.

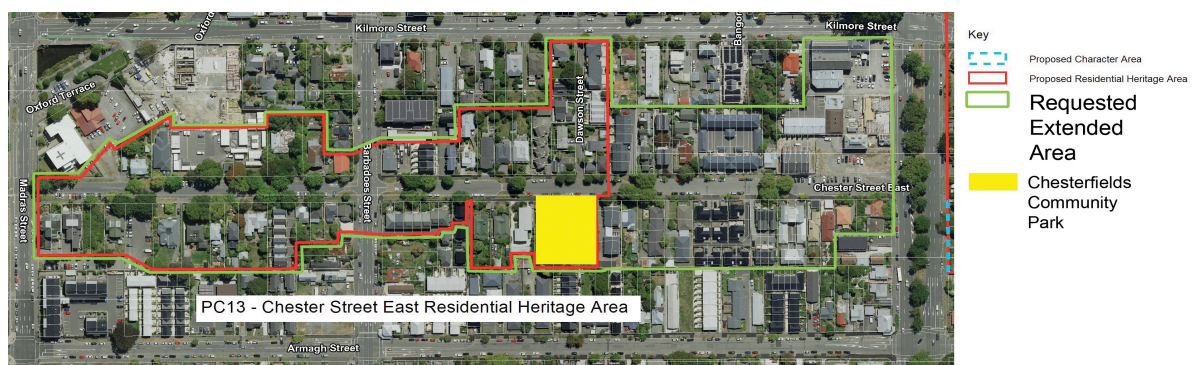
*The footsteps laid down by those who went before us
create the paving stones upon which we stand today.*

1. SUMMARY OF OUR SUBMISSION

This submission asks that The Christchurch City Council reaffirm the amendment that it passed at its meeting on 13 September, 2022: that the special heritage and character of Chester Street East include the *whole* of Chester Street East not merely $\frac{3}{4}$ of the street.

We strongly support the positive intention of The Christchurch City Council to preserve and enhance areas of special heritage and character whilst encouraging increased inner-city living.

Over a period of half a century, The Christchurch City Council has, in creative partnership with local residents in Chester Street East and Dawson Street, established a unique, treelined, densely-populated, inner-city residential area. Not including the *whole* street would severely threaten the nature of the street and its cohesion.



Above: The green line includes the area proposed by the residents of Chester Street East to be recognised as a special heritage area in our city, with Chesterfields Park located at its heart. This was moved as an amendment by Councillor Jake McLellan on 13 September 2022 and passed by The Christchurch City Council. After passing this amendment, the Council voted against implementing the Government's intensification policy in which this amendment was contained.

2. HISTORICAL BACKGROUND

Chester Street East is as wide a street as its neighbouring Kilmore Street (and other inner-city streets). But from the 1980s, the Christchurch City Council began a visionary narrowing and beautification of this street (in the Western half – Madras to Barbadoes Streets – with 2 road humps, 2 curves, and a splitter island; in the Eastern half – Barbadoes Street to Fitzgerald Avenue – with 5 road humps and build-outs as pinch points). Powerlines were removed. Trees were planted on the footpaths on both sides of the street. Dawson Street was included in the beautification by the addition of permanent planter features.



The Eastern half of Chester Street East prior to CCC development in the 1980's



The Eastern half of Chester Street East in 2022 – post CCC development

Historically, this area is in the planned city park which was to have gone all the way around the central city. It retains this park-like feel. In the quakes, some trees were lost at the North-East corner, and it is our understanding that the intention is that they be replaced – the plots for each of these trees still exist, awaiting replanting, in the footpath.

From the mid 19th Century, cottages and other dwellings were established in this area. Dwellings have continued to be built up to the present.

The street was bookended in the West by the grand houses starting at 86 Chester Street East. At the East, the Fitzgerald Avenue end, the bookend was, until the quakes, the Crighton Cobbers Youth & Community Club buildings (connected to Ward's Brewery). We look forward to a building on this North-East corner which connects to this history in the manner that Flow Wellbeing Centre (229 Fitzgerald Avenue) has shown is possible.

Already, as part of acknowledging the full street's special character, in the Eastern quarter of the street, there is the wonderful refurbishment of the 7 historic units at 173 Chester Street East which sit adjacent to an 1880s cottage, and so on.

In the 2010s, The Christchurch City Council was again visionary in developing the Chesterfields Community Garden (160 Chester St East). This garden now forms the heart of the street and its strong sense of community.



The Christchurch City Council recognised the whole street as the Chester East neighbourhood (<https://ccc.govt.nz/culture-and-community/central-city-christchurch/live-here/our-central-neighbourhoods/chester-east-neighbourhood>).

The special character of this *whole* street is of a 1980s inner-city-renewal, traffic-calmed, tree-lined street. There were plans to apply such renewal to other inner-city streets also – they were never implemented. As such, individual dwellings, from the second half of the 19th Century through to the present day, can be seen to be defining and contributory dwellings.

There is no other street like this in the inner city, within the boundary of the four avenues. Dawson Street shares in this described sense of this neighbourhood; it is to be noted that all the trees on Dawson Street are on private property. The distinguishing character of Dawson Street is in reflecting the sense of the integrity of Chester Street East.

3. ONGOING DEVELOPMENT

The Christchurch City Council meeting of 13 September, 2022, passed the amendment to extend the Chester St East/Dawson St heritage area to include all properties with a Chester St East address but then the Council voted against the Plan as a whole in which this amendment occurred. This leaves the nature of Chester Street East in the current consultation process. We seek that the amendment that was passed by The Council in 2022 be included in the final Plan currently being consulted about.

Arguments against including the whole of the street include a percentage-of-historic-dwelling-calculation system that counts the seven historic units at 173 only as “one” building, and astonishingly (!) states that “because it has been partly rebuilt, its heritage values are compromised” (by such non-Christchurch logic the Cathedral in the Square, and in fact every building in Christchurch, has its heritage value compromised). The consultant did not realise that historically (as now!) these units were mixed-use commercial and residential, claiming that they are simply “a non-residential building converted to residential use”. Since the Council’s September 2022 decision, which left our street in limbo, in the Eastern quarter of Chester Street East being discussed, two dwellings over 100 years old have been demolished, and two further dwellings over 100 years old are intended to be demolished. So, the calculating system has become a self-fulfilling prophecy: the percentage of older dwellings is dropping because the high threshold was not reached by underestimating both the numbers and the historical nature of the dwellings currently there.

Excluding the Eastern quarter of Chester Street East from the proposed Residential Heritage Area threatens the cohesion of the area, relegates Chesterfields to the edge of the community rather than being its heart, disconnects this area from its natural relationship with Fitzgerald Avenue and the neighbouring Englefield/Avonville RHA. Separating the nature of the Eastern quarter of Chester Street East from the rest of the street threatens to undermine the uniqueness of the whole street with issues of excess traffic flow, parking, and other problems.

Formal acknowledgment, in the manner we have advocated, of the special character of the *whole* of Chester Street East would have it as connecting Te Papa Ōtākaro/Avon River Park and City Promenade on its West end with the tree-lined Fitzgerald Avenue on its East end, and from there into the Red Zone in the North and associating it with the next Residential Heritage Area beginning at Elm Grove and going through into Beverley Park. Such a recognition of Chester Street East as a whole by The Christchurch City Council continues the visionary planning of the Council in 2022, previous years and decades, and builds on the passion of and partnership with the local residents, and continues the encouragement of the residents and owners in this partnership of enhancing the special character and also the green nature of this part of our Garden City.

This submission is not about discouraging inner city living – quite the opposite: the neighbourhood of the whole of Chester Street East and Dawson Street, centring on Chesterfields (rather than seeing that park as being on the edge of the neighbourhood) is an excellent example of the benefits and sense of community of inner city living. **The City Council’s decision to wisely include the whole of Chester Street East in preserving and enhancing areas of special heritage and character will leave a legacy for current and future generations to flourish in our city.**

Date of this submission: 12 April, 2023

Details of submitter No: 1025 - Kristin Mokes

Submitter:	Kristin Mokes
Submitter Address:	

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 10/05/2023

First name: Kristin

Last name: Mokes

Postal address:

Email:

Daytime Phone:

Would you like to present your submission in person at a hearing?

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Consultation Document Submissions

Provision:

Not Stated

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

Provision: We should not be creating more heritage areas, which may hamstring in making our city more modern, green and with lower emissions.

Decision Sought: Please reconsider adding so many more heritage sites- especially suburbs. In central city, it isn't as bad but suburbs don't define the city.

My submission is that:

We should not be protecting these areas as heritage character areas- our city needs to change and grow for a better future, and protecting a few areas of a select few holds back the city and everyone else in working towards a better future.

Details of submitter No: 1026 - Maxine Webb

Submitter:	Maxine Webb
Submitter Address:	[REDACTED]

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 10/05/2023

First name: Maxine

Last name: Webb

Postal address:

Email:

Daytime Phone:

Would you like to present your submission in person at a hearing?

Yes

Additional requirements for hearing:

Consultation Document Submissions

Provision:

Not Stated

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

Provision: Heritage plan change P C 13

Decision Sought: That the creation of these Heritage areas be approved and that if possible they be extended and increased!

My submission is that:

I absolutely support the inclusion of 11 new heritage areas, and am only disappointed that they don't include more areas and extend to cover a greater number of houses within those areas. I have witnessed the systematic loss of Armagh St east to dreadful black white and grey box like structures with no parking provision (how can you charge an EV ?). These "flats" are minute with little amenity and zero contribution to community! At three stories they do not have lift access so are not designed for families or elderly, and with growing 'work from home' options the living spaces are grossly inadequate. The 'inmates' currently dump furniture on the curb when they're not parking on it, or when they're not covered with dozens of bins. They are not architecturally designed in that very few are orientated to the sun and have a "coronation St" vibe about them with small windows and no balconies. In order to achieve higher density you do not need to replace a single dwelling with 16-20 rabbit hutches of this caliber. When the Christchurch earthquake provided an opportunity for developers to move in, we've unfortunately gone with the lowest common denominator! I walk around my neighborhood of City central East and what I see being built makes me want to weep for what we've lost. Nobody will come to visit Christchurch to see this 'urbane' development, so it is incredibly important to preserve what we have left and to try and save as much of the city's heritage as possible. Christchurch was already being redeveloped before the imposition of these high density rulings and as such they have very much missed the mark for our city. I can't state strongly enough that these rulings are very damaging to the long term amenity and appreciation of the Garden city!

Details of submitter No: 1027 - Daniel John Rutherford

Submitter:	Daniel John Rutherford
Submitter Address:	

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 10/05/2023

First name: Daniel John

Last name: Rutherford

Postal address:

Email:

Daytime Phone:

Would you like to present your submission in person at a hearing?

Yes

Additional requirements for hearing:

Consultation Document Submissions

Provision:

Not Stated

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

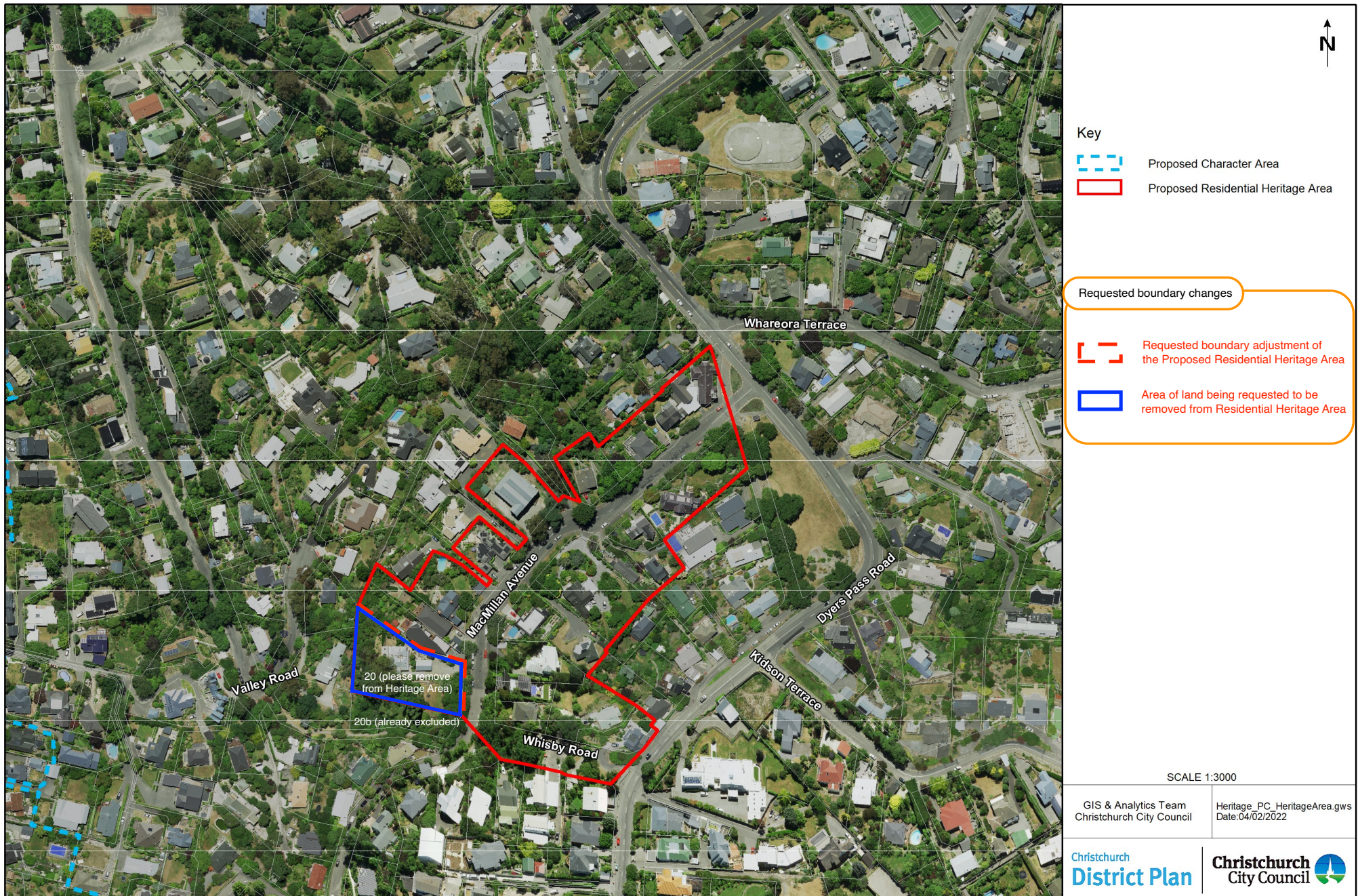
Provision:N/A

Decision Sought:PC-13 Please remove our property from the proposed MacMillan Ave Residential Heritage Area. Our property is in two titles, located on the southwest edge of the proposed Residential Heritage Area. Part of our property (20) is in the proposed RHA and part of it (20b) is out of the proposed RHA. We are requesting that the boundary of the proposed RHA is adjusted to exclude 20 Macmillan ave, so all of our property is kept together, out of the proposed heritage area.

My submission is that:

Please remove our property from the MacMillan Ave Residential Heritage Area, for the following reasons; 1. HERITAGE VALUES Our home at 20 Macmillan Ave no longer meets the heritage area criteria because it no longer embodies the heritage values of the area. 2. TECHNOLOGICAL AND CRAFTSMANSHIP SIGNIFICANCE Due to earthquake damage, our home needed substantial repair work and it has subsequently lost any heritage value it might have had. We were fortunate to have the support of the council during these repairs (and all work was consented). During the post-earthquake repairs and renovations, all of the fireplaces were removed, walls were removed, remaining walls were gibbed, new windows and doors were put in, a modern kitchen, office and ensuite bathrooms were installed, and so on. The house is now a modern-style, open-plan home. It no longer has technological and craftsmanship significance. 3. ARCHITECTURAL AND AESTHETIC SIGNIFICANCE The house at 20 MacMillan Ave was not designed by an architect or significant designer in the first place, and subsequent work done on the building means that it no longer has any architectural or aesthetic significance. 4. CONTEXTUAL SIGNIFICANCE The house is no longer visible from the road, so has no heritage value to the public, including contextual significance. a. There are plantings along the MacMillan Ave boundary screening all buildings from view from the roadside. b. A large 'versatile' garage (consented) has been built between the road and the house, providing a second layer of screening, to hide the the house from view (please note that the photo of our property on the record form is outdated). c. The property is located at the end of a right-of-way. The screening of the buildings, and location down a long driveway, make it more similar to a rear site than a front site. 5. EXCLUSION OF THE GARDEN The record form refers to the 'large, well planted garden' being the main reason for its 'defining' rating. a. Most of the garden is outside the proposed heritage area (on the second title of our property, 20b Macmillan Ave). b That area of garden is largely undeveloped, and looks pretty rough. We want it to remain excluded from the RHA, so we can beautify or develop it with ease, if we choose to in the future. c. On the included title (at 20 MacMillan Ave) the original old world garden has been removed and replaced with an asphalt storage area and easy-care modern decking across most of the site around the house. d. A large area of garden along the north boundary was removed when that area of land was excavated for the (consented) large retaining wall supporting the neighbours' house at 18 Macmillan ave. e. Most of the remaining land on that site is now asphalt driveway. 6. CULTURAL AND SPIRITUAL SIGNIFICANCE

The property has never had any historically significant owners, so it has no cultural or spiritual significance. There have essentially been three families of owners of the property since it was constructed; a. the owners referred to in the record form (the Shaws) were a salesman and a home economics teacher. b. the next owners (the Bates) had a small shop, c. we are landscapers. None of those owners was historically significant. 1st CONCLUSION; Our home has not retained a level of authenticity and integrity sufficient to demonstrate the values of the defining buildings, structures and other features that establish the historic heritage values of the Residential Heritage Area. RHA BOUNDARY Our property is in two titles, located on the southwest edge of the proposed Residential Heritage Area. Part of our property (20) is in the proposed RHA and part of it (20b) is out of the proposed RHA. The proposed boundary of the RHA would split our property down the middle. We are requesting that the boundary of the proposed RHA is adjusted to exclude 20 Macmillan ave, so all of our property is kept together, outside the proposed heritage area. THE CONSEQUENCES OF SPLITTING UP OUR PROPERTY We've lived in this home for 30 years, brought up a family here and plan to retire here. Our son who is a builder hopes to build a home for his family on the second title in the future, so he can bring up his own family next to us in Cashmere. This is really the only way he and his family would be able to have their own home and would ensure we have care nearby. If this plan were to go ahead we may need to adjust the boundary between the two titles to a more practical location. Should the Heritage area goes ahead as planned, we would have a major heritage boundary running between our two titles, which would make it very difficult for us to adjust the boundary between the two titles. Consequently, this would make us staying in our beloved family home with a very large garden in our old age very difficult. 2nd CONCLUSION We consider it is unreasonable for the council to impose an RHA boundary through the middle of our property, splitting our home through the middle of the two titles that it's comprised of. We request the council exclude both properties from the Heritage zone.



PC13 - MacMillan Avenue Residential Heritage Area

Details of submitter No: 1028 - Rob Seddon-Smith

Submitter:	Rob Seddon-Smith
Submitter Address:	

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 10/05/2023

First name: rob

Last name: Seddon-Smith

Postal address:

Email:

Daytime Phone:

Would you like to present your submission in person at a hearing?

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Consultation Document Submissions

Provision:

Not Stated

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

Provision: General commentary

Decision Sought: - An effective means whereby any property within a heritage area may be developed, within reasonable limits defined by the area, the cost of assessment to be borne by Council; and - A clear definition of what constitutes the particular 'heritage' character of each area, so that it is easy to determine how any proposed development might meet such character standards - Lyttelton for example should not permit buildings to obstruct views of the water from the first floor or above of other properties. Standards need to be clear and if not clear, should not be imposed at all. - A date not more than 30 years hence whereby the heritage status of an area and the rules governing it should be reviewed or otherwise automatically removed; and - An effective means of compensating property owners deemed to be of heritage value for the additional expenses incurred in maintenance and any loss of value as a result of the designation.

My submission is that:

The matter of the preservation of heritage is complex. It both preserves the character of the areas included and stifles future development, effectively condemning the area therein to stagnation. Whilst we do not want to see wholesale destruction of the cityscape, neither do we need to have parts of it preserved as they are imagined to have been for all time. Ultimately the fear of the future is not a reason to retain all parts of the past. In assigning heritage status, there needs to be a good means whereby appropriate development can occur, without undue constraint, and in not assigning heritage status, the Effects On The Environment of otherwise apparently unconstrained development must also be considered. Heritage is seen as 'a good thing' but tends to be ill-defined and very subjective, and whilst recognising the value in preserving a few outstanding examples of architecture, wholesale refusal to change is also foolish. For clarity, I do not own and do not intend to own property in any affected area. I have however seen the negative effects of such policies in the UK and know the difficulties they create for reasonable development. It is common to see heritage buildings fall into disrepair because they are too expensive to maintain and cannot be demolished. Such is the price of expecting the owner to do all the work of preserving a property for all. If Council thinks a property, tree or an area is of sufficient value to warrant protection for the benefit of all, the being for the benefit of all, the burden of cost should fall on all, not the few and Council should be prepared to fund proper management of the areas so that the amenity of living therein is not diminished.

Details of submitter No: 1029 - Tom Reece

Submitter:	Tom Reece
Submitter Address:	

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 10/05/2023

First name: Tom

Last name: Reece

Organisation: On my own behalf.

Postal address:

Email:

Daytime Phone:

Would you like to present your submission in person at a hearing?

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Consultation Document Submissions

Provision:

Not Stated

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

Provision: Restoration of historic / heritage buildings.

Decision Sought: Change the CCC internal requirement to one where the restoration is of value to its historic nature.

My submission is that:

Currently the CCC has an internal requirement that they will only fund the restoration of an historic property if it makes a financial return to them. In having this requirement they are diminishing the 'worth' of an historic building in its own right. I cite Kukupa Side School, Pigeon Bay where the restoration will only occur if this CCC provision is met. Along with the diminishing of the historic value of the property the CCC are opening the door to having something introduced to the site that is of no or doubtful value or of detriment to the residents of the bay.

Details of submitter No: 1030 - Paul Mollard

Submitter:	Paul Mollard
Submitter Address:	

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 10/05/2023

First name: Paul

Last name: Mollard

Postal address:

Email:

Daytime Phone:

Would you like to present your submission in person at a hearing?

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Consultation Document Submissions

Provision:

Not Stated

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

Provision: The geographic boundaries of the heritage areas

Decision Sought: Remove any reference to residential heritage areas and make those areas subject to the same development rules as the rest of the city. Heritage plan change (PC13) should be eliminated altogether.

My submission is that:

I submit that there should be no Residential heritage areas in Christchurch. The areas selected for this status do not seem to have any unique or distinguishing features and the only reason I can think of for making them heritage areas is to placate people who live in those areas who oppose the rest of the development plan for the city.

Details of submitter No: 1033 - Sam Spekrijse

Submitter:	Sam Spekrijse
Submitter Address:	

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 10/05/2023

First name: Sam

Last name: Spekrijse

Postal address:

Email:

Daytime Phone:

Would you like to present your submission in person at a hearing?

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Consultation Document Submissions

Provision:

Not Stated

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

Provision: PC13, all Heritage Area provisions.

Decision Sought: Not include any special provisions for residential heritage areas.

My submission is that:

These whole areas are not significant enough to be given effective indefinite exemption to intensification, especially with the buffer zone requirements as planned. Listing specific buildings is sufficient to retain the vast majority of the cultural value.

Details of submitter No: 1035 - Ben Hay-Smith

Submitter:	Ben Hay-Smith
Submitter Address:	

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 10/05/2023

First name: Ben

Last name: Hay-Smith

Postal address:

Email:

Daytime Phone:

Would you like to present your submission in person at a hearing?

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Consultation Document Submissions

Provision:

Not Stated

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

Provision: Proposed Heritage Plan Change PC13 (all provision)

Decision Sought: Review the provisions to check if they actually fit the purpose of heritage regulation - preserving beautiful, significant architecture and providing ongoing amenity for the public. Specifically? Consider omitting the following buildings from the change to the District Plan's Schedule of Significant Historic Heritage for protection: - 9 FORD ROAD, OPAWA, CHRISTCHURCH - COMMERCIAL BUILDING AND SETTING, FORMER BANK OF NEW ZEALAND, 129 HIGH STREET, CHRISTCHURCH - COMMERCIAL BUILDING AND SETTING, FORMER CANTERBURY TERMINATING BUILDING SOCIETY - 159 MANCHESTER STREET, CHRISTCHURCH - DWELLING AND SETTING - 35 RATA STREET, RICCARTON - And the 25 baches at Taylor's Mistake

My submission is that:

I am 25 years old. I grew up in Christchurch—it's my home, it's where my family and my community are, and it's a place I'd love to be able to settle in. Policies like this Proposed Heritage Plan Change (PC13) are going to have a significant impact on whether that becomes a reality. Broadly, I support the intent of these provisions. I can see the argument for preserving cemeteries and publicly-used bridges. But baches at Taylor's Mistake? The old Canterbury Terminating Building Society building? And... just a house at 9 Ford Road? Adding a building to the schedule just because a famous person happened to live there once is a great way to ossify half of your city's prime real estate. This just reveals a lack of intent or focus to the change. Ultimately, the purpose of a heritage plan should be to preserve genuinely significant and beautiful architecture to provide ongoing amenity for the citizens of Christchurch. This **has** to be balanced against the fact that every restriction placed on development within the city boundaries is an impediment to a competitive urban land market in Christchurch, with clear and significant flow-on effects for housing affordability (which happens to be upstream of basically the entirety of individual, household, and community wellbeing). This is beside the fact that so much of what has been labelled 'heritage' in the past has promptly been left to degrade and fall into disrepair, interfering with the entire purpose of having heritage restrictions in the first place. It's not preserving beauty. It's preserving history for its own sake, and ignoring the needs of our present citizenry and our future generations. Frankly, heritage regulation should be accompanied by some sort of guarantee that a building or area of significance will actually receive the requisite funding to keep it in a good condition. Until the day that becomes a more explicit aspect of the heritage regulation framework itself—and until Christchurch's heritage regulation is reformed to better target the underlying purpose of beautiful, high-amenity areas for the public's benefit—I strongly urge the council to add only the most critical sites to the schedule of Christchurch's heritage buildings. And otherwise get on with the task of making Christchurch an affordable, attractive place to live. You'd do far better by focusing your efforts on incentivising **new** beautiful developments than by holding on to the past.

Details of submitter No: 1036 - Emily Arthur

Submitter:	Emily Arthur
Submitter Address:	

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 10/05/2023

First name: Emily

Last name: Arthur

Postal address:

Email:

Daytime Phone:

Would you like to present your submission in person at a hearing?

Yes

Additional requirements for hearing:

Consultation Document Submissions

Provision:

Not Stated

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

Provision: I am not sure of the specific rule numbers, however it relates to restrictions on rebuilding in a heritage area.

Decision Sought: 1. No consent needed to demolish contributory houses if rebuilding in line with character of street. 2. Remove the mandatory 1m from one boundary and 3m from the other on new builds. Allow houses to be built closer than 1m or 3m from property boundaries if that was the way the one being removed was constructed. Thus keeping heritage value. 3. Allow up to 70% site coverage on a site by site basis. So allow discretion when deciding on site coverage, rather than having a blanket rule of 40%

My submission is that:

I live at 128 Chester Street East. My house has been designated as 'contributing' to the character of the street. My property has significant structural issues and it is not cost effective for me to fix it. I think it is unfair that those in the category of contributory should be made to get a consent to demolish a house, given they must rebuild in character anyway. I am opposed to this restriction for contributory houses. I am opposed to the restrictions on rebuilding. It says in the plan that I cannot build within a metre of one side boundary and 3m from the other. My current house is less than 1m from my neighbour. In fact, my stormwater goes into their gutter and they take it away. The other side is about 1.5 metres from the boundary. I think it is wrong that the council wants to keep the streets heritage value and then make rules that contradict this as, obviously, houses built close to each boundary line is a heritage feature. This is trying to have it both ways and I think it is hugely unfair. I would end up with a ridiculously narrow house if I had to follow these rules. I am opposed to the rule that states that houses must only take up 40% of the land area when rebuilt. This is not a rule to protect heritage value as many old houses in the street cover more than this. Also - if you cannot see into the back yard why does it matter if it takes up more than 40%? I think this call needs to be made on a case by case basis. Having Chester Street East designated a heritage street has drastically affected the financial value of my investment. Allowing me to rebuild to a decent site coverage while still maintaining the heritage value would go some way towards lessening this financial impact.

Details of submitter No: 1038 - Peter Earl

Submitter:	Peter Earl
Submitter Address:	

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 10/05/2023

First name: Peter

Last name: Earl

Postal address:

Email:

Daytime Phone:

Would you like to present your submission in person at a hearing?

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Consultation Document Submissions

Provision:

Not Stated

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

Provision: All of them, as I believe it would negatively impact the city, by restricting development and therefore increase the cost of living while decreasing the quality of living

Decision Sought: I wish to see the council stay inline with the national plan, if not implement even more aggressive deregulation than the national plan

My submission is that:

I am strongly opposed to any additional regulations, if these buildings were truly valuable then the free market would retain them. By forcing their maintenance and existence we restrict the growth and development of the city where more valuable uses of the land might be implemented, such as additional housing in our crippling housing and cost of living crisis. I personally do not want to see more old buildings falling to bits and fall of asbestos in the city while I struggle to pay my rent because the supply of housing is not meeting the demand for housing in Christchurch, resulting in inflation adjusted house prices being 4 times higher than what they were 20 years ago.

Details of submitter No: 281 - Mary Crowe

Submitter:	Mary Crowe
Submitter Address:	

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 10/05/2023

First name: Mary

Last name: Crowe

Preferred method of contact Email

Postal address:

Email:

Daytime Phone:

Would you like to present your submission in person at a hearing?

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Person of interest declaration: I am *

Explain the grounds for saying you come within category (a) or (b) above:

Note to person making further submission:

- A further submission can only support or oppose an original submission listed in the summary. It is not an opportunity to make a fresh submission on matters not raised in the submission.
- A copy of your further submission must be served on the original submitter within 5 working days of making the further submission to the Council

Consultation Document Submissions

Provision:

Not Stated

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

Provision: Natural Hazards, Natural and Cultural Heritage, Chapter 14 - Residential

Decision Sought: 1. Amend the zoning of Hurley Street from High to Medium density. 2. Chester Street East should receive heritage protection zoning for the whole length of the street.

My submission is that:

Re: Hurley Street Christchurch Central. The zoning for this street should be amended to Medium, not High density zone. There are a number of reasons for this. Firstly, it is on the edge of the red zone and suffers significant flooding in heavy rain events as does it's only vehicular access on Oxford Tce. For this reason, it is inappropriate that buildings up to 10 storeys could be built here. The character of the parkland area surrounding the street would also be negatively affected. Additionally, in regard to public transport, this area is very poorly provided for, with no bus route on Barbadoes, Madras or Kilmore Streets, and only very infrequent buses on Fitzgerald ave. Therefore, this area does not come under the "close to public transport" description required for a High density zone. Heritage precinct - in regard to Chester Street East, the whole of the street should come under the heritage zoning to protect the character of the street. It has a significant number of historic buildings the length of the street, and it would impact negatively if highrise buildings were allowed in close proximity.

Details of submitter No: 289 - Cody Cooper

Submitter:	Cody Cooper
Submitter Address:	

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 10/05/2023

First name: Cody

Last name: Cooper

Preferred method of contact Email

Postal address:

Email:

Daytime Phone:

Would you like to present your submission in person at a hearing?

Yes

Additional requirements for hearing:

Person of interest declaration: I am *

Explain the grounds for saying you come within category (a) or (b) above:

Note to person making further submission:

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- A copy of your further submission must be served on the original submitter within 5 working days of making the further submission to the Council

Consultation Document Submissions

Provision:

Not Stated

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

Provision: Designations and Heritage Orders, Chapter 14 - Residential

Decision Sought: Amend the minimum section size to be less than as currently proposed. Remove Lyttelton as a heritage area and instead pick a specific street or smaller area to designate as heritage.

My submission is that:

I support the intensification in our City and changes to make it more affordable to live in our city, including making it more accessible on foot and by cycling. Also, I do not support minimum section sizes, such as 300-400m². Further, I also do not support making all of Lyttelton a heritage area.

Details of submitter No: 329 - Dominic Mahoney

Submitter:	Dominic Mahoney
Submitter Address:	

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 10/05/2023

First name: Dominic

Last name: Mahoney

Preferred method of contact Email

Postal address:

Email:

Daytime Phone:

Would you like to present your submission in person at a hearing?

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Person of interest declaration: I am *

Explain the grounds for saying you come within category (a) or (b) above:

Note to person making further submission:

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Consultation Document Submissions

Provision:

Not Stated

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

Provision: Chapter 14 - Residential

Decision Sought: I wish Perry Street to not be rezoned High-density Residential Zoning. Ideally staying at the current Residential Suburban or equivalent.

My submission is that:

I am opposed to Perry Street, Papanui being rezoned to "High-Density Residential Zone". During the 2016 Christchurch Replacement District Plan hearing, Decision 41 Chapter 14: Additional Residential Medium Density Areas for Linwood (Eastgate), Hornby and Papanui (Northlands) identified that: "[21] ... Those submissions gave us a great deal of information that we had not previously received, particularly relating to the four war memorial streets in the area. The full history of these memorial streets, honouring the fallen of World War II, is set out in attachments to the evidence of Mrs Margaret Howley (RMD130) and can be found on our website. [22] Frankly, if we had known of this information it would have been a good reason not to require notification. That is because it at least indicates a potential matter of historic heritage to which the direction as to protection in s 6(f) of the RMA could well apply. [24] There are four streets (St James, Windermere, Dormer and Perry) that are war memorials and could be compared to Memorial Avenue itself. There are plaques recognising this status, and St James Avenue hosts an annual Anzac Day Parade. As such, these streets have special significance and we are satisfied RMD zoning would denigrate that significance." [28] ... and the view we take of the importance of the four memorial streets included in these two sectors, we reaffirm the RS and RSDT zoning of these areas. In 2016 it was deemed unacceptable to rezone Perry Street to Medium Density

and it was kept as Residential Suburban because of historical heritage nature of the street. Therefore, how is going from the current Residential Suburban zoning to High-density Residential Zoning not a breach of s 6(f) of the RAM and contradictory to the 2016 Hearing decision for the same reasons that the housing density intensification was rejected in 2016. Additionally, most of Perry Street (east of Dudley Creek) is identified on the current CCC Planning Maps as being in a Flood Management Area and at risk of surface flooding during the 1-in-200 APE Flood Event. This area has restrictions on floor levels, building platforms and ability to undertake site filling as it is required for floor water storage due to the elevated flooding risk of the area. How is going to a High-Density Zoning in this area sensible when you would be putting more people, property and built infrastructure at increased risk of flooding. Considering the recent (early 2023) flooding event in the North Island and devastating societal effects, how is undertaking more intensified development, further increase the exposure to this flooring hazard a prudent urban development measure? Therefore, to prevent increase flooding risk to future development High-density Residential Development should not be allowed in these areas of elevated floor risk.

Details of submitter No: 404 - Lawrence Kiesanowsk

Submitter:	Lawrence Kiesanowsk
Submitter Address:	

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 10/05/2023

First name: Lawrence

Last name: Kiesanowsk

Preferred method of contact Email

Postal address:

Email:

Daytime Phone:

Would you like to present your submission in person at a hearing?

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Person of interest declaration: I am *

Explain the grounds for saying you come within category (a) or (b) above:

Note to person making further submission:

- A further submission can only support or oppose an original submission listed in the summary. It is not an opportunity to make a fresh submission on matters not raised in the submission.
- A copy of your further submission must be served on the original submitter within 5 working days of making the further submission to the Council

Consultation Document Submissions

Provision:

Not Stated

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

Provision: Natural and Cultural Heritage

Decision Sought: To keep some areas as original

My submission is that:

I followed most and agree to partial infill leaving some areas for character and heritage otherwise the city will change to much with no memories etc

Details of submitter No: 428 - Sarah Wylie

Submitter:	Sarah Wylie
Submitter Address:	

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 10/05/2023

First name: Sarah

Last name: Wylie

Preferred method of contact Email

Postal address:

Email:

Daytime Phone:

Would you like to present your submission in person at a hearing?

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Person of interest declaration: I am *

Explain the grounds for saying you come within category (a) or (b) above:

Note to person making further submission:

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Consultation Document Submissions

Provision:

Not Stated

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

Provision: Natural and Cultural Heritage, Chapter 14 - Residential

Decision Sought: I support the changes re sunlight as proposed,

My submission is that:

I think that far too much high density housing is being developed which impacts negatively on surrounding dwellings. I strongly support CCC taking all measures to ensure preservation of longer hours of sunlight to dwellings adjacent to high density development, and applaud CCC for recognising that we are not Auckland, and we don't want to be - we need our sunshine! I also strongly support measures to prevent development of high density housing in heritage areas, including the area surrounding Putāringamutu Riccarton Bush. There is no place for high density housing in the area surrounding this tāonga.

Details of submitter No: 459 - Joseph Bray

Submitter:	Joseph Bray
Submitter Address:	

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 10/05/2023

First name: Joseph

Last name: Bray

Preferred method of contact Email

Postal address:

Email:

Daytime Phone:

Would you like to present your submission in person at a hearing?

Yes

Additional requirements for hearing:

Person of interest declaration: I am *

Explain the grounds for saying you come within category (a) or (b) above:

Note to person making further submission:

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Consultation Document Submissions

Provision:

Not Stated

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

Provision: Specific Purposes Zone, Chapter 14 - Residential

Decision Sought: I am seeking that the council passes ALL proposed amendments to PC13 and PC14

My submission is that:

I am in support of ALL proposed changes to PC14 and PC13. For changes i to iv, the increase in residential building height is certain to increase city centre population. Not only does improve the liveliness of the city, of which large parts (mainly those industrial) feel dead and/or lifeless, but also having more people move into the centre city removes the necessity for such a large rate of personal automobile ownership. Our city centre is decently walkable, and removing the need for a commute into the city removes the need for cars for a number of owners. In addition the need for more large inner-city, single-story carparks would be reduced, as these do not make the city look attractive whatsoever and take up space that could be used for other projects. The increase in residential housing would also reduce the need for more sprawling sub-division that spread further and further away from the city, the increase in these ensures a car-dependent Christchurch. Proposed change v of PC14 also helps facilitate inner-city housing and so I am in support of it for the same reasons as above. vi and vii I also agree with. I am also in agreement with the proposed changes to PC13, as providing more historical and cultural sites in Ōtautahi not only will improve the surface-level feel of the city, but also improve the city's cultural identity and quality of life.

Details of submitter No: 636 - Rod Corbett

Submitter:	Rod Corbett
Submitter Address:	

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 11/05/2023

First name: Rod

Last name: Corbett

Preferred method of contact Email

Postal address:

Email:

Daytime Phone:

Would you like to present your submission in person at a hearing?

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Person of interest declaration: I am *


Explain the grounds for saying you come within category (a) or (b) above:

Note to person making further submission:

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Attached Documents

Name

Christchurch City Council Submission 

Christchurch City Council Submission re PC14 and PC13

My submission is that:

PC14: We oppose the proposed plan change for the block bounded by Riccarton Rd, Harakeke St, Kilmarnock St & the railway line to be designated HRZ (High-density residential zone) in place of its current Suburban residential transitional zone. As residents of Jane Deans Close, (which is within the block area named above), we know it to be a safe enjoyable cul-de-sac for many families who would be adversely affected by any six-storey development nearby. Six storeys may be appropriate within Christchurch CBD, but Jane Deans Close is not CBD and any change of designation is entirely inappropriate for this neighbourhood.

PC13: We also have a unique War Memorial within the Jane Deans Close cul-de-sac which must be preserved as a heritage item in memory of the members of the NZ 20th Battalion & 20th Regiment who lost their lives in support of New Zealand's freedom.

I seek the following decision from the Council:

PC14: That the current zoning for the block bounded by Riccarton Rd, Harakeke St, Kilmarnock St & the railway line be retained as it is currently: Suburban residential transitional zone.

PC13: For the existing War Memorial within the Jane Deans Close cul-de-sac to be preserved as a heritage item in memory of the members of the NZ 20th Battalion & 20th Regiment who lost their lives in support of New Zealand's freedom.

Details of submitter No: 700 - Hilary Talbot

Submitter:	Hilary Talbot
Submitter Address:	[REDACTED]

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 12/05/2023

First name: Hilary

Last name: Talbot

Preferred method of contact

Postal address:

Email:

Daytime Phone:

Would you like to present your submission in person at a hearing?

☐ Yes

Additional requirements for hearing:

Person of interest declaration: I am

*

Explain the grounds for saying you come within category (a) or (b) above:

Note to person making further submission:

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Attached Documents

Name

12 May submission on district plan



34 Hanmer Street

Christchurch 8011

12 May 2013

To Christchurch City Council

Submission on proposed Christchurch City District Plan Changes Nos 13 and 14

My name is Hilary Talbot. I live at 34 Hanmer Street Christchurch. This address is in the proposed Englefield Avonville Heritage Area and the Englefield Character Area and the house is classified as Defining within the Heritage Area.

I have lived at this address for about 3 years and before that I lived for over 20 years in Thorndon Wellington. This was also in a historic area and some my comments are informed by that experience.

1 Broad support of Englefield Heritage Area

I support the creation of the Heritage Area and the continuation of the character area with more stringent controls. Hanmer Street provides a coherent streetscape and there are very few of these streetscapes left. Once broken they are gone forever.

2 Support the retention of Englefield House

I support the retention of Heritage listed Englefield House

3 Tensions between modern life and older houses

The creation of the heritage area does raise some issues going forward. Older houses have many fine qualities for living but in order to survive they need to be able to provide for modern life. This includes installing modern technology, making them more energy efficient and enabling more light to enter. There is a balance to be struck over retrofitting double glazing, sky lights, heat pump units, solar panels, external hot water cylinders, television aerials etc. This leads onto the comment below.

4 *Comment on proposed rules*

The Council's website states:

We're proposing that, within the identified RHAs, resource consent would be needed for new buildings, additions or alterations to buildings, new fences and walls higher than 1.5 metres, and to demolish or relocate those buildings considered most significant (called "defining" or "contributory" buildings). We'll assess all **development** proposals on how they affect the heritage values of the area.

In the rules the permitted activities are a narrow category of maintenance and repairs (subject to council oversight).

Other activities appear to be regulated as resource consents. Some of these activities may be quite minor and many if not most out of sight of the road. This is wider than the word development I have bolded above. I assume the rules do not apply to the interiors of buildings in heritage areas unless they are listed as heritage items but this is not

The reason I have focused on this is from experience. In the area I lived in Wellington we were subject to two broad rules - demolition of buildings constructed before 1930 and window alterations would require resource consents.

At some juncture the Wellington council issued a draft proposal to have more detailed regulation including restricting satellite dishes (very useful when you live against a hill) and skylights. This caused quite a back-lash. Time shows attachments like satellite dishes, however ugly, don't affect houses permanently. Skylights facing the road can be inappropriate but there are more discrete sites for their placement. But it was unfair as many houses already had them in place. These examples show that achieving the right balance can be challenging.

I submit that the drafting of these rules should be reviewed to see if a more nuanced approach to buildings in heritage areas is appropriate.

Based on Wellington experience I support proposed regulation of fences.

5 *Boundary of heritage area and buffer zones*

The Council's website states:

The areas themselves, and the rules we're proposing for these areas, are new to the District Plan. Our proposal also includes introducing a buffer for Residential Heritage Areas, with a high-density border to better protect their edges.

It is not clear how this buffer zone will work. Gilby Street at the back of Hanmer Street is zoned High Density but there is no indication of its protective feature.

I support a protective buffer zone for the Heritage area.

6. *New buildings in heritage area*

The proposed Englefield Area is relatively intact but it appears that the Council housing site on Elm Grove may be subject to development at some stage. The plan appears to contain rules designed to ensure any rebuilding supports the heritage character. I support rules which achieve this.

I wish to be heard in support of this submission.

Details of submitter No: 734 - Marie Byrne

Submitter:	Marie Byrne
Submitter Address:	

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 12/05/2023

First name: Marie

Last name: Byrne

Preferred method of contact Email

Postal address:

Email:

Daytime Phone:

Would you like to present your submission in person at a hearing?

Yes

Additional requirements for hearing:

Non business hours please

Person of interest declaration: I am

*

Explain the grounds for saying you come within category (a) or (b) above:

Note to person making further submission:

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Consultation Document Submissions

Provision: Chapter 9 Natural and Cultural Heritage

Seek Amendment

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

Chapter 9 Schedule of Significant Heritage: Medium Density Residential area in Phillipstown Cashel Street to Ferry Road, Bordesley Street to Nursery Road be considered for a heritage area and subsequently a qualifying matter.

Chapter 9: Heritage Item Qualifying matter: Add a qualifying matter that provides for an interface to heritage items (buildings, sites)

My submission is that:

Regarding Chapter 9 Schedule of Significant Heritage areas Qualifying Matter: I would like to suggest that the Medium Density Residential area in Phillipstown Cashel Street to Ferry Road, Bordesley Street to Nursery Road be considered for a heritage area and subsequent qualifying matter, protecting an area of former workers cottages. In 1936 a metropolitan planning scheme was proposed that expanded industrial areas into the residential areas of Sydenham and Phillipstown. Although the areas were not fully and formally zoned until the first review of the district planning scheme in 1968, residential housing made way for industry in those 30 years. There are heritage areas that protect workers cottages in Sydenham, but nothing in Phillipstown. Existing former workers housing in Phillipstown is increasingly being lost for multi-unit development. Without a heritage provision, the Council is allowing final removal that was initiated nearly ninety years ago.

These cottages have the potential to provide affordable housing options, particularly for first home buyers. However first home buyers are being out bid of the market by developers buying the properties and demolishing them. The Council has the opportunity to stop both the loss of heritage and provide for greater affordable home options. Historical Reference: Christchurch City Contextual History Overview - 2005)

Regarding Chapter 9 Heritage Items: I suggest adding an interface between heritage properties and residential areas as a qualifying matter. This would stop the building out around a heritage property by adjacent large scale developments. A specific example is the Former Pumphouse on Tuam Street. Large scale developments on the properties adjacent to this heritage item would detract from the character of the item.

Provision: Chapter 14 Residential

Seek Amendment

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

Chapter 14: Sunlight Access qualifying matter: Increase the height threshold for sunlight recession minimums.

Chapter 14: Residential Industrial Interface Qualifying Matter: Increase the interface zone to be a block from the industrial areas to residential areas.

My submission is that:

Regarding the sunlight access qualifying matter: (Chapter 14) The height threshold is too low, it needs to be higher, particularly in proposed higher density areas or on a scale depending on number of storeys of both the property under development and the property next to it that is affected. Home owners who have been forward thinking to install solar panels on roofs to provide alternative sources of power will be impacted by a loss of sunlight with protentional multi storey developments. These citizens have had future financial provision and climate change principals in mind. They and the environment should be protected.

Regarding the Residential Industrial Interface Qualifying Matter (Chapter 14): the interface is too small. Industrial activity affects more than one property size. Properties that are on rear sections are not included. It should be increased to at least one residential block.

Details of submitter No: 737 - Christian Jordan

Submitter:	Christian Jordan
Submitter Address:	[REDACTED]

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 13/05/2023

First name: Christian

Last name: Jordan

Preferred method of contact Email

Postal address:

Email:

Daytime Phone:

Would you like to present your submission in person at a hearing?

Yes

Additional requirements for hearing:

Person of interest declaration: I am *

Explain the grounds for saying you come within category (a) or (b) above:

Note to person making further submission:

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Consultation Document Submissions

Provision: Chapter 14 Residential

Seek Amendment

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

Oppose zoning changes and qualifying matters including:

Sunlight, Airport Noise, Tsunami, Character Areas, Historic Heritage

as outlined in attachment

My submission is that:

Oppose qualifying matters outlined in attachment

Provision: Chapter 9 Natural and Cultural Heritage**Seek Amendment**

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

See attachment

My submission is that:

Heritage and Character areas require strengthening

Provision: Chapter 16 Industrial**Seek Amendment**

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

See attachment

My submission is that:

Residential Industrial interface be adapted and Mixed use zone be amended

Provision: Chapter 8 Subdivision, Development and Earthworks**Seek Amendment**

I seek the following decision from the Council


If seeking to make changes to a specific site or sites, please provide the address or identify the area:

See attachment

My submission is that:

Residential subdivision should have no minimum vacant lot size

Attached Documents

Name
Submission 2023 CCC 

Submission CCC Plan Review 2023

The intention of the Enabling Housing Supply amendment was to expeditiously make consenting new homes in urban areas simpler, more cost efficient and allow a more diverse range of housing options.

What the Christchurch City Council has delivered (notably well outside the Act's intended timeframe of August 2022) is a *Plan* that significantly reduces development options in much of the city (including downzoning operative Residential Medium Density and RSDT land to effective single unit sites in areas which are within immediate walking distance of public transport and shopping in Woolston, New Brighton and other areas), a *Plan* that significantly reduces the ease of subdivision by increasing the minimum lot size from 200m² to 400m² in most of the operative Residential Medium Density zone (and increases from 300m² to 400m² in most of the operative RSDT zone), and a *Plan* that fails to implement sufficient protection of sunlight in areas where the overall character of the neighbourhood would have justified applying qualifying matters.

The result is a city divided into areas of an ultra liberal zero planning restrictions and other almost equally large areas of repressive restrictions preventing almost all development.

Those residential areas that do fall into the ultra liberal zones face a future of social disharmony, agitation and fear. Stripping sunlight from a house in Christchurch's wintry climate will abrade the very humanity from that home and also its community. The fear of this *aggressiveness* occurring in one's own backyard, will lead those (who are privileged enough to be able) to buy their neighbour's further reducing supply of homes for sale in these already affluent areas.

Demand for 40,000 homes over 30 years:

Christchurch has seen an unsustainable bubble in terrace townhouse development over the past four years. Driven initially by falling interest rates and then supercharged by Government changes to interest rate deductibility, ex-pats seeking a pandemic bolthole and non residents (North Islanders and Singaporeans) seeking a place to invest.

The scale and density of many of the current unit developments are not dissimilar to those constructed during the housing booms that occurred during the mid 1970s (oil shock era) and the mid 1990s (prior to the Asian financial crisis).

The recent (now oversupplied) boom in these small townhouses does not reflect a long term shift in demand towards this type of housing.

Memories of post earthquake insurance and Body Corporates issues together with difficult geotechnical conditions in much of the proposed HDRZ (such as TC3 land around Bealey Ave), mean that both demand and supply of apartment developments is also likely to be subdued.

The majority of demand in the affluent north-northwestern and popular southwestern inner suburbs that are proposed to be MRZ and HDRZ will continue to be for family homes that are primarily detached. **This means these neighbourhood must remain a comfortable place to have a single family home.**

The most sustainable and economically efficient way to add homes is to infill already vacant land such as backyards. This lowers the price of the existing home plus provides a site (or sites) for a new home that could be in a similar price range as the existing home. (This is what kept Auckland prices from running away between 1980 and 2010 despite a huge increase in population over the period).

In contrast, what we are see with total redevelopments is that (by way of actual example), a \$500,000 (2022 value) good EQC repaired 4 bedroom home in Linwood on 750m² gets demolished and replaced with 6 x \$649,000 2 bedroom townhouses. This total redevelopment

both increases the average cost of a home in the area and decreases the average size of a home. (Note also that in the near term, this kind of redevelopment will be unsustainable as investor purchasers will not accept a sub 4% gross yield when market interest rates are 6.5%+).

How can 40,000 homes achieved:

A hypothetical scenario for where new homes could be built:

Proposed mixed use and brownfield zones:

1000 non residential sites at an average of 10 units per site

10,000 new homes

Total redevelopment with townhouses (and a few apartments)

2000 sites with an average of 6 units per site

10,000 new homes

Subdivision of existing homes (primarily new dwellings added behind existing, but could also include conversion or replacement of existing dwelling with 2 or 3 new homes)

5,000 homes adding 2 additional units

10,000 new homes

10,000 homes adding 1 additional unit

10,000 new homes

Total 40,000 new homes

In this scenario with around 160,000 homes in Christchurch in 2023, only 2,000 existing homes would need to be demolished for intensive redevelopment over 30 years - about 67 houses (or 1 in every 2,400) per year.

The scenario would require 15,000 homes to be subdivided (etc) over 30 years - about 500 (or 1 in every 320) homes per year.

Impacts on House Price and affordability:

Total redevelopment of residential land for medium density townhouses and apartments:

- Reduces supply of existing homes (which are generally the lower priced homes in an area)
- In the Christchurch context, generally increases the average price for homes while decreasing the average floor area
- Is generally undertaken by medium sized firms intending to make a profit and thus inflating the price paid by the new home buyer well above the actual cost.

Infill subdivision

- Retains existing homes on a reduced site, so generally at a lower price
- Provides new infill homes generally of a similar size to existing homes at or around the price of existing homes
- Generally undertaken by individuals, often with the motivation of providing a home for themselves, therefore less incentive for profit to be the sole driver of supply

When the above scenario and the impact on price affordability is viewed together, it is clear that **the key to creating affordable supply is the allowance of infill across the city wherever land is available.**

A *Plan* that enables and rewards medium to large corporations constructing 'pens' or 'coups' to house a renter underclass while prohibiting individuals from creating innovative and dynamic

housing solutions that suit their own needs on their own terms is destined to fail the people of Christchurch.

Solutions:

Since the 1995 City Plan was notified, there has been a rewrite of Medium Density rules in 2009/10 and a rigorous Independent Hearing Panel process through 2014 to 2018. Tens of thousands of hours were spent by submitters, Council staff, consultants, lawyers and the Hearing Panel themselves. Throwing most of this away and allowing potentially hundreds of mini plan change applications (through submissions) on this new *Plan*, so soon after the completion of the last plan change process is a travesty.

Option 1

- (i) Withdraw the current proposal and implement the MDRS in all zones (RS, RSDT, RCC, RH and RMD) **except for the provisions relating to street setback, recession planes and building height.**
- (ii) Leave all RS, RH and RSDT geographically the same as the operative plan, but use qualifying matters of character to retain the relevant existing (operative) street setback, building height and recession planes.
- (iii) In the RMD and RCC adopt MDRS except for recession plane which could be either 4m vertical with existing operative RMD/RCC recession planes above that or 5m vertical with existing operative RMD/RCC planes above that (note that this would allow a 2 storey dwelling close to the boundary but would create a greater setback for 3 storey dwellings).
- (iv) **Have no minimum size for subdivision of vacant lots in any zone** except that a detached house must be shown to be able to comply with all rules (no consent or actual build required for issue of title).
- (v) Retain all proposed Heritage and Character area provisions. With the further character and heritage areas added (outlined later in this submission).
- (vi) Apply the Mixed Use zone to all the proposed area except for the land between Blenheim Road and the railway line (which is not appropriate for residential).

Option 2

I strongly believe that the fundamental principles of the MDRS should be applied across all areas of the city but with the strict limitation on recession planes, heights and setbacks outline above; however failing that I raise the following objections to the following qualifying matters and rules:

Subdivision:

As outlined in the my opening statements - the proposed *Plan* is contrary to the intent of the legislation by further restricting subdivision in several zones.

The increase in minimum section size from 200m² to 400m² in most of the RMD zone and 300m² to 400m² in most of the RSDT zone will all but eliminate subdivision of sections for infill housing.

As outlined earlier - infill housing is critical to retaining housing affordability - it sustainably retains existing homes (and their character) on smaller sites at a lower price and it grants individuals an opportunity to create and design their own home also at a lower cost.

Take an example of a corner site 40m by 15m (600m²). Perhaps the homeowner finds the garden a little large but they can retain the existing house on a slightly smaller site by slicing off an 8m x 15m lot at the end of the garden. This could accommodate a 6m by 6m two storey unit (72m²), a single carpark and a small 35m² garden. Why can't the owner subdivide this as a vacant 120m² section if it can be showing that a compliant house could be built?

There should be no minimum section size for a vacant lot in any urban residential zone if a compliant house can be shown to fit (no requirement for consent or actual building for title to be issued).

Airport Noise:

There is no justification and it is potentially unlawful to reduce density due to the Airport Noise zone given that noise can be mitigated through construction and design. The close proximity to Education facilities, transport links etc and good ground conditions mean the principle MDRS should be adopted with limits to recession planes and heights as outlined further below.

Transport Accessibility:

Again there is no justification and it is potentially unlawful to reduce density due to transport accessibility given that provision of space for private transport mitigates this impact.

If this is a valid qualifying matter it defeats the entire purpose of the legislation which is to enable affordable housing supply, as it grants a council the option to zone the city essentially as per the status quo. It is also questionable how recession plane and road setbacks are affected by transport accessibility.

Furthermore the location of these zones is questionable, take the area between Innes Rd, Rutland and Cranford Sts; and also the area around Autumn Pl on Winters Rd. Both locations are immediately adjacent to major cycleways, a major arterial and within a very short walk of Cranford St bus stops. They are also only a short distance to Merivale and Papanui shopping. There appears to be little validity in the qualifying matter.

Tsunami Zone:

The justification for this zone is perplexing.

If there is such a risk to life that no development should occur in these areas (some of which is currently RMD and RSDT zones and subject to intense redevelopment) why was this not raised in the 2014-2018 plan review?

If there is such a risk why are there pockets only a few centimetres higher than the surrounding land (for instance in the Mackworth St area) that are isolated and not in the zone? A damaging Tsunami wave would likely have a wavefront that would be at least feet high and given that it would have passed hundreds of obstacles (fences and buildings) of various heights is unlikely to be stopped by such a minor change in elevation.

If there is such a high risk, protection structures such as levies and elevated refuges should surely be constructed by Council to protect the public?

I acknowledge that there is a small risk of damaging Tsunami, however plans to mitigate the risk should be made and areas where homes can either be elevated or there is an easy escape path should not be put in no development zones. Given the existing communities in the area and the need for the area to not fall into decay, a more in-depth analysis and long term plan needs made, especially when many of the proposed medium density areas have there own issues with local flooding which are not addressed by any qualifying matters (such as around Papanui and Fendalton streams).

Vacuum Sewer:

This is an infrastructure issue that Council should look to resolve with a deadline not something that should restrict development indefinitely.

Industrial Interface:

The height restriction on the residential side of an industrial is appropriate, however there should be reciprocal height restrictions of 8m for 20m on the industrial side of the boundary.

The recession plane that applies to the industrial side of ANY industrial/residential boundary should comply with RS recession planes. This is because the bulk, size and site coverage of an industrial building will cause far greater shading than a residential one.

Also where any industrial building is located within 10m of a residential boundary a landscaping strip with trees and planting at least 3m wide should be included on the industrial site to create separation.

Mixed Use Zone:

The mixed use zone should not apply between Blenheim Rd and the Railway track. The zone is otherwise a positive change.

Historic Heritage:

This plan review should not be used to remove any Historic Sites from the register even if the site is damaged or destroyed.

Heritage Areas:

Further heritage areas need to be assessed and created across the city to protect Christchurch's remaining built history.

Built history tells the story of the city and after a period of such great loss following the Christchurch earthquakes, far greater effort needs to be made to preserve the best of what remains.

A qualifying matter requiring an assessment of the heritage value of any pre 1940 building intended for demolition with options considered for retention and reuse should have been made a requirement as part of this *Plan*.

Character Areas:

As outlined earlier further character areas are needed to protect the liveability of the city. These character areas should have recession plane, building height and setback rules similar to the operative plan.

Additional character areas of importance that should be included are:

All of the Special Amenity Areas from the 1995 City Plan not already character areas including in particular:

Fendalton SAM 8 and 8A

Deans Bush SAM 7 and &A

Opawa SAM 5

St James SAM 16 (plus Windermere Rd)

Also the following larger areas which were not SAMs:

- *Knowles, Rutland, Papanui, Dormer*
- *Normans, Papanui, Blighs, railway line*
- *Gloucester, Woodham, Trent, England*

Details of submitter No: 741 - Susan Bye

Submitter:	Susan Bye
Submitter Address:	[REDACTED]
Organisation:	Lower Cashmere Residents Association

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 12/05/2023

First name: Susan

Last name: Bye

Organisation:

Lower Cashmere Residents Association

Preferred method of contact Email

Postal address:

Email:

Daytime Phone:

Would you like to present your submission in person at a hearing?

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Person of interest declaration: I am *

Explain the grounds for saying you come within category (a) or (b) above:

Note to person making further submission:

- A further submission can only support or oppose an original submission listed in the summary. It is not an opportunity to make a fresh submission on matters not raised in the submission.
- A copy of your further submission must be served on the original submitter within 5 working days of making the further submission to the Council

Consultation Document Submissions

Provision: Chapter 14 Residential

Seek Amendment

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

My submission is that:

Currently densification is ad hoc, many units replacing one residence on a larger piece of land. There is little opportunity for planned development incorporating recreational space. Any spare space in larger complexes is used for car parking. Therefore it is less suitable for families with children. The architecture generally builds 'shoe boxes' in a style unsympathetic to the surrounding community. However, with no consents required at the moment, Christchurch is at the mercy of the developers whose main aim is to make money - at the cost of community. Areas of bare land have been cleared of anything growing to the cost of mature trees, destroyed for no reason. This should not be allowed. Each unit built has a tree planted, certainly, but they do not replace the effects that mature trees offer.

Provision: Chapter 10 Designations and Heritage Orders

Seek Amendment

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

Make Cashmere View St a heritage street.

The Opawaho Heathcote River corridor be designated as an area of special significance and area. It has a long history of significance to the Mana Whenua and European settlers in the whole catchment.

My submission is that:

Mature tree areas must be protected. Some streets in the suburbs are cooler in summer because of the tree cover. Trees are an important addition to all areas.

Some streets reflect the time they were built, showcasing a particular style of the times. We would like to see the Cashmere View st declared a heritage area

Details of submitter No: 743 - Matthew Gibbons

Submitter:	Matthew Gibbons
Submitter Address:	[REDACTED]

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 12/05/2023

First name: Matthew

Last name: Gibbons

Preferred method of contact Email

Postal address:

Email:

Daytime Phone:

Would you like to present your submission in person at a hearing?

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Person of interest declaration: I am *

Explain the grounds for saying you come within category (a) or (b) above:

Note to person making further submission:

- A further submission can only support or oppose an original submission listed in the summary. It is not an opportunity to make a fresh submission on matters not raised in the submission.
- A copy of your further submission must be served on the original submitter within 5 working days of making the further submission to the Council

Consultation Document Submissions

Provision: Chapter 14 Residential

Seek Amendment

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

Removal of recessional planes and setbacks is good. Density around the central city is desirable. However, density should be permitted everywhere. Higher density will improve amenities like shopping and public transport. Demand creates its own supply. Hence the low public transport accessibility area should go. Higher density near the airport should be allowed - people can install sound proofing. Perimeter block housing should be easier. Setbacks are not desirable. Hence 14.6.2.2.b should be removed. So should 14.6.2.2.c. iv A and B. No new heritage areas should be allowed as they restrict development in parts of Christchurch where people want to live. A good rule would be that for every house added to a heritage area another is removed.

My submission is that:

The rules need to be changed to permit greater density in a wide range of places. Making it easier to build new houses will improve affordability and result in a more compact city that is cheaper to service and with lower transport times. It will also make

active commuting easier and save on roads.

Details of submitter No: 765 - Margaret Howley

Submitter:	Margaret Howley
Submitter Address:	[REDACTED]h

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 12/05/2023

First name: Margaret

Last name: Howley

Preferred method of contact Email

Postal address:

Email:

Daytime Phone:

Would you like to present your submission in person at a hearing?

Yes

Additional requirements for hearing:

Person of interest declaration: I am *

Explain the grounds for saying you come within category (a) or (b) above:

Note to person making further submission:

- A further submission can only support or oppose an original submission listed in the summary. It is not an opportunity to make a fresh submission on matters not raised in the submission.
- A copy of your further submission must be served on the original submitter within 5 working days of making the further submission to the Council

Consultation Document Submissions

Provision: Chapter 14 Residential

Oppose

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

My submission is that:

I am writing to oppose any intensification of housing in Papanui that is proposed within the streets that carry the Papanui WWII Memorial Plantings.

The Papanui WWII Memorial Planting has been granted protection under Chapter 13 of this current proposed Plan Change. That protection is decades overdue and very much appreciated.

The protection of the WWII Memorial plantings is the Qualifying Matter that we seek exemption under.

In 2015 when the residents of Papanui appeared before the IHP to speak to their opposition of housing

intensification in these streets the Hearing Panel delivered Decision 41 removing all streets in Papanui that carried WWII Memorial Plantings from intensification.



We sought the removal as there was a great level of concern by residents that should any intensification happen the result would be damage to the roots, canopy and trunks of the Memorial Plantings. Damage that would result in tree death. That towering buildings would also diminish the mana of the Memorial.

All the reasons for protection of the WWII Memorial placed before the IHP in 2015 stand today, if anything there is greater need for protection.

Again removal from intensification is sought to afford the WWII Memorial plantings that are so treasured by the community that live under them the best possible protection.

The best possible outcome for the the Papnui WWII Memorial Avenues would be for them to remain in the density of housing that they are now in, Residential Suburban Density, as this will restrict damage by development to a low level of possibility.

Attached Documents

Name	
Plan-Change-13-Statements-of-Significance-New-Items	
Decision-41-Chapter-14-Additional-Residential-Medium-Density-Areas- (4)(1)	

**CHRISTCHURCH DISTRICT PLAN – SCHEDULED HERITAGE PLACE
HERITAGE ASSESSMENT – STATEMENT OF SIGNIFICANCE**

HERITAGE ITEM NUMBER 1459

**PAPANUI WAR MEMORIAL AVENUES - ALPHA AVENUE,
CLAREMONT AVENUE, CONDELL AVENUE, DORMER STREET,
GAMBIA STREET, HALTON STREET, HARTLEY AVENUE, KENWYN
AVENUE, LANSBURY AVENUE, NORFOLK STREET, PERRY STREET,
SCOTSTON AVENUE, ST JAMES AVENUE, TILLMAN AVENUE,
TOMES ROAD, WINDERMERE ROAD, CHRISTCHURCH**



Photo- Christchurch City Council heritage files

The Papanui War Memorial Avenues are of overall High Significance to Christchurch and Banks Peninsula.

The Papanui War Memorial Avenues, 16 Streets with trees and plaques, are of high historical and social significance for their association with World War II, and its impact on Christchurch communities. The trees are associated with Harry Tillman, the Christchurch and Papanui Beautifying Associations and the Papanui Returned Services Association, who requested between 1943-1946 that Council plant memorial trees in a variety of species in Papanui streets as a living memorial to the memory of fallen soldiers. Council planted and agreed to maintain the trees, and residents of the Papanui District were required to contribute to the costs of the trees as well as the plaques. The local RSA also contributed to costs.

The Papanui War Memorial Avenues are of high cultural and spiritual significance as memorials to fallen servicemen from the Papanui District. Over time they have come to be identified by parts of the community as memorials to fallen servicemen from the Christchurch District. Members of the Papanui community, and the Papanui RSA have expressed their value of the memorials for the community and the city, and there are regular commemorative events associated with the avenues and trees.

The Papanui War Memorial Avenues are of architectural and aesthetic significance for their landscape values. The different species of trees were chosen by Reserves Superintendent Maurice

Barnett for their suitability for Papanui soils. The trees create a strong aesthetic for the 16 streets due to their scale, colour, texture and seasonal change. This varies street by street due to the different species planted. Bronze plaques with the inscription 'Papanui Memorial Avenue to the fallen 1939-1945' hung from simple metal brackets mark the beginning and in some cases each end of the avenues.

The Papanui War Memorial Avenues are of technological and craftsmanship significance for the range of different species of trees that are represented in the streets, specifically chosen for their physical characteristics and the soils in the area. There is also technological value evident in the planting and maintenance methods and techniques used.

The Papanui War Memorial Avenues are of high contextual significance for the groups of tree species planted in each individual street, and for the relationship of the 16 streets to one another in terms of their proximity and similarities. The streets, plaques and trees contribute to the unique identity of this part of Papanui, and are recognised local landmarks. The memorial avenues also relate to the range of housing types within the streets, some of which are consistently characteristic of a particular age and style.

The Papanui War Memorial Avenues are of archaeological and scientific significance for the potential to provide archaeological evidence relating to past landscaping methods and materials, and human activity on the site.

References – Christchurch City Council Heritage Files

REPORT DATED: 10 JUNE 2022

PLEASE NOTE THIS ASSESSMENT IS BASED ON INFORMATION AVAILABLE AT THE TIME OF WRITING. DUE TO THE ONGOING NATURE OF HERITAGE RESEARCH, FUTURE REASSESSMENT OF THIS HERITAGE ITEM MAY BE NECESSARY TO REFLECT ANY CHANGES IN KNOWLEDGE AND UNDERSTANDING OF ITS HERITAGE SIGNIFICANCE.

PLEASE USE IN CONJUNCTION WITH THE CHRISTCHURCH CITY COUNCIL HERITAGE FILES.

**CHRISTCHURCH DISTRICT PLAN – SCHEDULED HERITAGE PLACE
HERITAGE ASSESSMENT – STATEMENT OF SIGNIFICANCE
HERITAGE ITEM NUMBER 1409
*KNOX PRESBYTERIAN CHURCH AND SETTING –
28 & 28A BEALEY AVENUE, CHRISTCHURCH***



PHOTOGRAPH: C. Forbes, 14/9/2016(with permission)



PHOTOGRAPH: G. Wright, CCC, 15/2/2015

HISTORICAL AND SOCIAL SIGNIFICANCE

Historical and social values that demonstrate or are associated with: a particular person, group, organisation, institution, event, phase or activity; the continuity and/or change of a phase or activity; social, historical, traditional, economic, political or other patterns.

Knox Presbyterian Church (Knox Church) and its site are of high historical and social significance for the long history of continued use as a church site located in the central city, for its connections with the Rev. Robert Erwin and other notable ministers such as Phyllis Guthardt, and the impacts and response to the Christchurch earthquakes. Knox Church has been the home of a Presbyterian congregation for over a century and is the sole remaining place of Presbyterian worship in the central city.

Presbyterians were prominent in Christchurch from the earliest days of European settlement in Canterbury, with the arrival in 1843 by the Deans family occurring prior to the Anglican settlement by the Canterbury Association in 1850. The first Presbyterian church was built in the city in 1857. A Presbyterian congregation was formed and a church opened on the North Belt (now Bealey Avenue) site in 1880, known as the North Belt Presbyterian Church. Their first minister, Rev. David McKee, died soon after. His successor, Rev. Robert Erwin, had a 39 year association with the church, from 1883 to 1922, and was later elected third moderator of the Presbyterian Church of New Zealand. By the turn of the 20th century, the population in the North Town Belt area was increasing rapidly, and a large new church was considered necessary. In June 1901 the foundation stone for the present church was laid by the Mayor of Christchurch (A. E. G. Rhodes); the completed church was dedicated on 1 May 1902. The North Belt Church was renamed Knox Church in 1904.

Other than minor changes and refurbishment in 1990-91 the church remained largely unchanged for over 100 years. The church was located near the large homes in Bealey Avenue of the same period, the commercial buildings in Victoria Street opposite and the Carlton Hotel (demolished post-earthquakes). The site reflects the past importance of this still major intersection, and the use of Victoria Street as a principal commercial street and route north. In 1955 the parish extended roughly from Normans Road to the north to Kilmore Street in the south to Champion Street in the east, and the railway to the west. A succession of 11 ministers has been called to the church since 1880, with regular worship, weddings and community activities being carried out. Today the church promotes itself as a progressive, inclusive faith community. Other congregations, including the Durham Street Methodist church used the church as a venue for worship after the earthquakes.

The church was severely damaged in the Canterbury Earthquakes of 2010 and 2011 and, as a result, was deconstructed to a point that only the original internal timber roof form and columns remained. These were then incorporated into a new design and the church reopened at the end of 2014. The church is a visible reminder of the church's recent history following the earthquakes and, coupled with the restored interior, tells the story of the successful retention and incorporation of original fabric when so much heritage was being lost in the City.

CULTURAL AND SPIRITUAL SIGNIFICANCE

Cultural and spiritual values that demonstrate or are associated with the distinctive characteristics of a way of life, philosophy, tradition, religion, or other belief, including: the symbolic or commemorative value of the place; significance to Tangata Whenua; and/or associations with an identifiable group and esteemed by this group for its cultural values.

Knox Church is of cultural and spiritual significance as it has been central to the religious, cultural and social life of both its Presbyterian congregation and members of the wider community for over a century. The Church has cultural and spiritual value for its association with the tenets and activities of Presbyterian worship

The church is a rare survivor of the Canterbury earthquakes and as such is valued by the wider Christchurch community. Following the earthquakes the building was a very visible landmark on a prominent corner site at the edge of the publicly inaccessible red zone. This was enhanced by lighting at night time which showed the interior of the church, highlighting how the damage had opened up a view into the church that had not been there previously. Its visual prominence and visible damage, coupled with the congregation's obvious determination to retain and rebuild the church, was a symbol of hope that encapsulated the wider impact of the quakes and the resilience of the community.

The value placed on the building and the efforts made to retain it were recognised when it was the Seismic Award winner at the Canterbury Heritage Awards in 2014.

ARCHITECTURAL AND AESTHETIC SIGNIFICANCE

Architectural and aesthetic values that demonstrate or are associated with design values, form, scale, colour, texture and material of the place.

Knox Church is of architectural and aesthetic significance for its design and development over time.

The original brick and Oamaru stone Gothic Revival building was designed by well-known Christchurch architect R. W. England, and was characterised by its restrained detailing, simple rectangular form and multiple gables. After the Canterbury Earthquakes of 2010 and 2011 the brick walls were taken down in their entirety.

The entire building has architectural significance as an innovative response to the damage caused by the earthquakes where the restored interior has been incorporated into a new church design. The new earthquake resistant exterior was designed by Alun Wilkie of Wilkie and Bruce. Expressed through new materials of copper, glazing and concrete, the modified design references the original exterior by retaining the distinctive triple gable roofline and buttresses – now of post-tensioned concrete, rather than brick - along with large windows in each gable. The large, clear windows provide views through to the timber interior. The roof is corrugated metal as it was previously, and there is a new central entrance at the west end of the church.

In materiality and appearance the rebuilt church closely relates to Alun Wilkie's Pīpīwharaua, The Piano, a music and arts facility on Armagh Street. This too is expressed through copper sheeting, glazing and solid columns. There is also a similarity to the restrained palette of the new buildings he designed in 2002 at St Michael's and All Angels School, consisting of zinc and unpainted concrete block.

The whole interior contributes to the significance of Knox Church because it is all that remains of the original church; it is the location of the traditions and practices of worship, activities and gatherings during its history of use and it is of architectural and aesthetic significance for its design, features, spaces and materials. Many interior features remain. The distinctive internal gabled roof structure of trusses and sarking remains in situ, supported by the original internal timber columns. The roof and columns have been incorporated into a contemporary reworking of the form of the original church. Other interior heritage features

include wall panelling and some fixtures and fittings, pews, the communion table, and the repaired Edgar Jenkins organ.

TECHNOLOGICAL AND CRAFTSMANSHIP SIGNIFICANCE

Technological and craftsmanship values that demonstrate or are associated with: the nature and use of materials, finishes and/or technological or constructional methods which were innovative, or of notable quality for the period.

Knox Church has high technological and craftsmanship significance for the innovation and technical expertise evident in the combination of new construction and original heritage fabric.

The interior of the church evidences Edwardian construction techniques and craftsmanship, materials, fixtures and fittings. Supported by internal timber columns and braced by its trusses and sarking, the church's roof remained standing through the Canterbury Earthquakes of 2010 and 2011.

A new stained glass window has been installed in the west wall. The window features mouth-blown glass from Germany and was created by stained glass artist Graeme Stewart. It is a re-working of the Canterbury landscape theme of the 1995 stained glass window that was previously in this position and was destroyed in the Canterbury earthquakes.

The strengthened interior is supported by the new lightweight, exterior envelope on a raft foundation which extends three metres out from the edge of the building. The exterior is predominantly raised seam copper sheeting, with large scale glazing and fair faced concrete. The pre-cast and post-tensioned concrete buttresses were lifted over the roof of the church and positioned in place before being connected to the existing timber structure, which was considered to be a unique engineering achievement in New Zealand at the time.

CONTEXTUAL SIGNIFICANCE

Contextual values that demonstrate or are associated with: a relationship to the environment (constructed and natural) setting, a group, precinct or streetscape; a degree of consistency in terms of scale, form, materials, texture, colour, style and/or detailing in relationship to the environment (constructed and natural), setting, a group, precinct or streetscape; a physical or visible landmark; a contribution to the character of the environment (constructed and natural) setting, a group, precinct or streetscape.

Knox Church has high contextual significance as a local landmark. It is located on a prominent corner site at the busy intersection of one of the four wide avenues, which define the central city, with the main arterial of Victoria Street/Papanui Road. The setting consists of the immediate land parcel in which the church is the primary feature of a complex that includes a 1964 annex, designed by Pascoe and Linton, comprising a hall, committee rooms, offices and associated facilities. The ancillary buildings recall the original appearance of the church in their brick cladding, while the painted vertical column features are echoed in the concrete buttresses of the new structure.

The church remains one of the most prominent buildings in an area containing a variety of eras, styles and materials, especially in the residential buildings that remain nearby. There are timber maisonettes, colonial dwellings, the 'Christchurch school' concrete block of the Dorset Street flats and the Streamline Moderne of the building known as Santa Barbara (now

commercial but previously residential). While these and Knox Church do not demonstrate any consistency of style, they all contribute to the diverse architectural and urban planning qualities of the area and the church helps to tell the story of the development, continuity and change in this part of Christchurch.

ARCHAEOLOGICAL SIGNIFICANCE

Archaeological or scientific values that demonstrate or are associated with: the potential to provide information through physical or scientific evidence an understanding about social historical, cultural, spiritual, technological or other values of past events, activities, structures or people.

The site of the building and setting are of archaeological significance as they have potential to hold evidence of human activity on the site which pre-dates 1900. The line of Victoria Street was historically the route north for Ngāi Tahu to reach forests which were an important source of mahinga kai (food gathering). The first church on the site was built in 1880.

ASSESSMENT STATEMENT

Knox Church, its setting and whole interior, is of overall high heritage significance to Christchurch including Banks Peninsula.

The church and its setting are of high historical and social significance as the home of a Presbyterian congregation for over a century, as the sole remaining place of Presbyterian worship in the central city and for the connections with the Rev. Robert Erwin. Knox Church is of cultural and spiritual significance for its central role in the religious, cultural and social life of both its Presbyterian congregation and members of the wider community for over a century. The church has architectural and aesthetic significance for its design and development over time, by architects R.W England and Alun Wilkie, and the uniqueness of the way in which the Edwardian interior has been integrated with a contemporary exterior. Knox Church is considered to have high technological and craftsmanship value for what it may reveal of Edwardian construction techniques and craftsmanship, materials, fixtures and fittings, and the technologically innovative response to the retention and strengthening of the existing heritage interior within a new exterior. Knox Church has high contextual significance for its location on a prominent corner site at the busy intersection of one of the four avenues with the main northern arterial route up Papanui Road and as the centrepiece of a diverse historic residential and commercial area. The church's site and setting are of archaeological significance as they have potential to hold evidence of human activity on the site which pre-dates 1900.

REFERENCES:

Christchurch City Council Heritage Files, Knox Church, 28 Bealey Avenue

New Zealand Heritage List/Rārangī Kōrero – Review Report for a Historic Place.
Knox Church (Presbyterian), Christchurch (List No. 3723, Category 2). 5 November 2018

Willis, G, *Selected Architecture Christchurch. A Guide*, 2005

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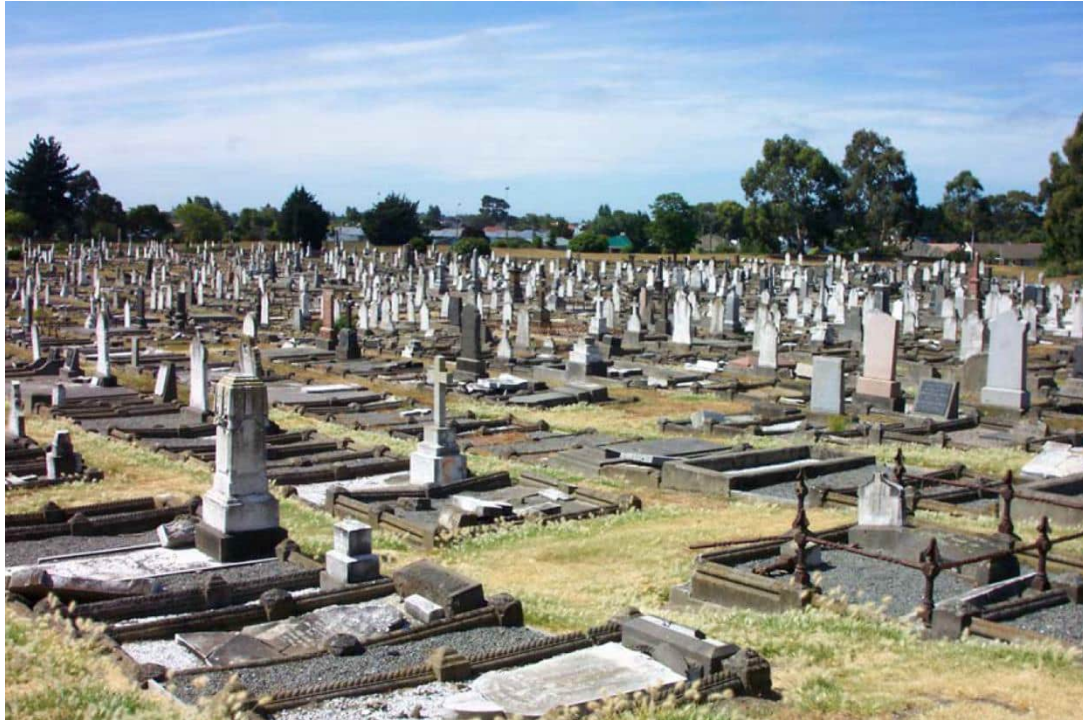
<https://www.scoop.co.nz/stories/AK1312/S00450/engineering-of-knox-church-rebuild-world-first.htm>

REPORT DATED: 24 SEPTEMBER 2021

PLEASE NOTE THIS ASSESSMENT IS BASED ON INFORMATION AVAILABLE AT THE TIME OF WRITING. DUE TO THE ONGOING NATURE OF HERITAGE RESEARCH, FUTURE REASSESSMENT OF THIS HERITAGE ITEM MAY BE NECESSARY TO REFLECT ANY CHANGES IN KNOWLEDGE AND UNDERSTANDING OF ITS HERITAGE SIGNIFICANCE.

PLEASE USE IN CONJUNCTION WITH THE CHRISTCHURCH CITY COUNCIL HERITAGE FILES.

**CHRISTCHURCH DISTRICT PLAN – SCHEDULED HERITAGE PLACE
HERITAGE ASSESSMENT – STATEMENT OF SIGNIFICANCE
HERITAGE ITEM NUMBER 1406
LINWOOD CEMETERY -
25 BUTTERFIELD AVENUE, CHRISTCHURCH**



PHOTOGRAPH: CHRISTCHURCH CITY COUNCIL

HISTORICAL AND SOCIAL SIGNIFICANCE

Historical and social values that demonstrate or are associated with: a particular person, group, organisation, institution, event, phase or activity; the continuity and/or change of a phase or activity; social, historical, traditional, economic, political or other patterns.

Linwood Cemetery is of high historical and social significance as the first municipal cemetery located outside the urban area; as such it represents a broad range of people from the Christchurch community. It is also associated with a number of key events in local and national history. The cemetery was still open in 2021.

Linwood Cemetery is the fifth oldest surviving cemetery to be established in Christchurch. It was established in 1884 on Reserve No. 210, well outside of the Four Avenues, to serve the city and eastern suburbs and in line with the international trend by the 1880s to move cemeteries away from town centres for sanitary reasons. There was an existing tramline that went as far as Linwood Cemetery, but the Council's offered tramline hearse service was never used for its intended purpose due to public preference for alternative arrangements for transporting the deceased.

By October 1884 the cemetery was largely laid out. When the Mayor and Councillors of the Cemetery Committee visited around that time to inspect the work the 18 acres of the reserve had been fenced and ten acres of land had been levelled and laid in grass. The sexton's cottage and mourning kiosk had been completed and the sexton

was in residence. Wellingtonias and Pinus insignis had been planted with a belt of macrocarpas planted all around the cemetery a few feet from the fence.

The burials in Linwood Cemetery provide an historical record of a wide cross-section of Christchurch society. The cemetery is a resting place of some notable New Zealanders of the 19th and 20th centuries, as well as ordinary citizens of Christchurch. The first interment at the cemetery was that of Sarah Anne Freeman, the wife of the first sexton, who died on 8 July 1884 of tuberculosis and was buried two days later. Included in the notable burials in the cemetery are Nurse Sybilla Maude, the pioneer of district nursing in New Zealand; businessman, philanthropist and politician Hon J T Peacock; Bishop Churchill Julius, the second Bishop of Christchurch and later the Archbishop of New Zealand; explorer Arthur Dudley Dobson; architect Robert William England; Christchurch Mayors William Wilson, father and son James and Thomas Gapes, and Henry Thomson; Isabel Moore (also known as Bella Button), a pioneer horsewoman; Press editor and manager, John Steele Guthrie; Effie Cardale, an early social worker; Augustus Florance who early experimented with soil-binding plants at New Brighton; and sports journalist James Selfe (Opus, 2006).

The cemetery is associated with the 1918 influenza epidemic and the world wars - events which greatly impacted the Christchurch community. A large number of deaths recorded in the Linwood Cemetery Burial Register in 1918 show death as a result of 'influenza pneumonia'. This reflects the great loss of life locally during the the influenza pandemic of that time.

Linwood Cemetery also contains a large number of graves of those who were associated with the military. There are 50 Commonwealth burials of those who served in World War I and four from World War II, commemorated at Linwood Cemetery.

Burial sites were set aside according to religious affiliation; Linwood is notable because it has a section for Jewish burials, the only one in Christchurch. Linwood Cemetery is important to the Jewish community as a heritage site and cemetery. Sixteen burials dating from 1864 in the Jewish Cemetery in Hereford Street were relocated to one plot in Linwood Cemetery in 1943 and a monument erected to commemorate these members of the early Jewish community in Christchurch. Many members of the Hebrew Congregation buried in Linwood Cemetery contributed to the city, including a number who undertook military service; Charles Louisson, former Mayor and councillor; Hyman Marks, philanthropist; Bernhard Ballins, one of the earliest fizzy drink manufacturers in the world; and Rabbi Isaac Zachariah, senior rabbi for the New Zealand Hebrew Community for 36 years.

The cemetery suffered earthquake damage in 2010 and 2011. A make safe project was completed by the Council and in conjunction with the friends of the cemetery at the end of 2013, pieces were returned to the correct grave plots, lying stones were displayed with the inscriptions showing, and the graves were documented.

CULTURAL AND SPIRITUAL SIGNIFICANCE

Cultural and spiritual values that demonstrate or are associated with the distinctive characteristics of a way of life, philosophy, tradition, religion, or other belief, including: the symbolic or commemorative value of the place; significance to Tangata Whenua; and/or associations with an identifiable group and esteemed by this group for its cultural values.

Linwood Cemetery is of high cultural and spiritual significance because its burials, practices, design and monuments encompass religious, spiritual, traditional,

commemorative, symbolic and cultural aspects and it is valued by Christchurch communities for all of these reasons.

The cemetery is the formally designated resting place for many of the community's dead. Its burials and memorials have value as commemorating individuals' lives, and are designed with traditional symbols and meanings. The designs and symbols reflect social attitudes to death and fashion in funerary ornamentation, ranging from the late 19th century, through the 20th century and into the early 21st century. It has commemorative importance to a number of families or descendants of those buried there as well as to social and historical groups commemorating certain individuals (eg the Bishop Julius grave has special meaning for a number of people for its connection with the Anglican Church in Christchurch).

Linwood Cemetery reflects a range of belief systems associated with the life-death cycle and the division of plots according to denomination and religion reflects the spiritual beliefs of the population of Christchurch over time (Opus, 2006).

The cemetery is held in high public esteem by many members of the community as evidenced by media coverage, interest by Councillors, as well as particularly notable neighbourhood and community support by the dedicated Friends of Linwood Cemetery Charitable Trust (Opus, 2006).

ARCHITECTURAL AND AESTHETIC SIGNIFICANCE

Architectural and aesthetic values that demonstrate or are associated with: a particular style, period or designer, design values, form, scale, colour, texture and material of the place.

Linwood Cemetery has architectural and aesthetic significance for its layout and its diverse range of monumental masonry and plantings.

The formal layout of Linwood Cemetery was combined with plantings to evoke meaning. Its trees and smaller plants combine with the headstones, paths and grassed areas to provide aesthetic values in the variety in form, scale, design, colour, texture and material of the landscape. The cemetery evokes a strong physical sense of age and history, in the patina of the monuments and dimensions of the mature trees (Opus, 2006).

Many of the graves have a degree of artistic and technical merit and represent historic fashions in funerary monuments. There are a range of designs and materials used that are notable, such as in the Thomson grave, the Fairhurst and Peacock mausolea, and the Claud Clayton grave. A number of the styles and motifs on the graves are rich in symbolism and meaning. For example: the motif of holding hands - a gesture of bidding farewell 'till we meet again'; broken columns - signifying mortality; urns (draped or undraped) signifying death; crosses (in a wide range of styles) symbolising the cross of Jesus. The Star of David is associated with the Jewish faith; the Square and Compass is associated with Freemasonry. A number of the old plantings also have symbolic meaning. The historic yew trees at Linwood Cemetery follow the English tradition and symbolise eternal life.

Specific trees that have significance in the cemetery are the yews planted on some graves, the belt of macrocarpa and pines that define the boundary and the poplars near the Butterfield Avenue entrance (Opus, 2006).

Linwood forms one of five cemeteries in the immediate area, and is one of a number of historic cemeteries in Christchurch. Its design is comparable to some 19th century European cemeteries and its grid layout bears similarities to other 19th century

cemeteries in Christchurch including Woolston, Addington, and Bromley (Opus, 2006).

TECHNOLOGICAL AND CRAFTSMANSHIP SIGNIFICANCE

Technological and craftsmanship values that demonstrate or are associated with: the nature and use of materials, finishes and/or technological or constructional methods which were innovative, or of notable quality for the period.

Linwood Cemetery is of technological and craftsmanship significance for the materials and craftsmanship of its grave monuments, which are representative of their period.

Many of the graves display the skills of craftspeople and a number of the techniques on display are no longer widely practised. In general the materials and methods used in the cemetery are representative of the period rather than notable, rare or unique. Craft skills evident include masonry, cast and wrought-iron work and other types of craftsmanship as fine examples of craft processes. The grave memorials represent the technical accomplishment of various Christchurch stonemasons, including CWJ Parsons, and Messrs Mansfield, Tait, Robertson, Trethewey, Hunter, Hoar, Masterton, Silvester, Fraser, Mason, Hampton, and Decra Art Ltd (Opus, 2006).

Many of the headstones are carved from marble or fashioned in highly polished granite, but there are also examples of technical skill in carving other materials, such as volcanic stone. Although most of the iron surrounds have been removed, some excellent examples of wrought and cast iron work remain in the cemetery (Opus, 2006).

CONTEXTUAL SIGNIFICANCE

Contextual values that demonstrate or are associated with: a relationship to the environment (constructed and natural), a landscape, setting, group, precinct or streetscape; a degree of consistency in terms of type, scale, form, materials, texture, colour, style and/or detail; recognised landmarks and landscape which are recognised and contribute to the unique identity of the environment.

Linwood Cemetery is of contextual significance for its prominence in the eastern suburban landscape, as a landmark in Linwood, and for its combination and arrangement of built and natural elements and features.

The site of Linwood cemetery is bounded by Butterfield Avenue, Hay Street, McGregors Road and Buckley Avenue/Bromley Park. It is situated on what was once a large sand dune, a common landscape feature of the Linwood area; thus it was sometimes referred to as the Sandhills Cemetery. Its raised position, the surrounding tall trees, the concentration of headstones visible from outside of the cemetery, and its position adjacent to Bromley Park give it landmark status in the area (Opus, 2006).

The cemetery is one of a number in the Linwood-Bromley area. As well as Linwood Cemetery, there is the Ruru Lawn Cemetery, Bromley Cemetery, Memorial Park Cemetery and Woodlawn Cemetery. Of these cemeteries, only the Linwood Cemetery was established in the 19th century; the rest date from the 20th century. Nevertheless, the cemetery has a degree of consistency in terms of type, scale, form, materials, texture, colour, style and detail with the nearby cemeteries in terms of grave materials, plantings and landscaping. The grave structures are however generally older, more decorative and have a patina of age in Linwood Cemetery.

ARCHAEOLOGICAL AND SCIENTIFIC SIGNIFICANCE

Archaeological or scientific values that demonstrate or are associated with: the potential to provide information through physical or scientific evidence and understanding about social historical, cultural, spiritual, technological or other values of past events, activities, structures or people.

The cemetery is of archaeological and scientific significance because it has the potential to provide archaeological evidence relating to past human activity on the site including that which dates prior to 1900.

The site is closely located to Te Ihutai (the Avon-Heathcote Estuary). Traditionally, a number of Ngai Tahu hapū and whānau used Te Ihutai, which was renowned for its abundance and variety of fish and shellfish. Several nearby kāinga nohoanga (settlements) took advantage of the estuary's rich food resources.
(<https://www.kahurumanu.co.nz/atlas>).

The cemetery is also of archaeological and scientific significance due to its early history of colonial development. The original tram tracks are believed to lie beneath the asphalt of the main pathways. The place could provide historical information through archaeological techniques such as stratigraphic soil excavation and materials analysis (Opus, 2006).

ASSESSMENT STATEMENT

Linwood Cemetery is of high significance to the Christchurch District.

Linwood Cemetery is of high historical and social significance as the first municipal cemetery created by Christchurch City Council outside the urban area and for its association with members of the Christchurch community. It also demonstrates the local impact of key events in history, such as the 1918 influenza pandemic and the world wars. The cemetery is of high cultural and spiritual significance because its burials, practices, design and monuments encompass religious, spiritual, traditional and cultural values and it is esteemed by members of the community, including descendants of those buried in the cemetery. It has architectural and aesthetic significance for its layout and its diverse range of monumental masonry and historic plantings. Linwood Cemetery is of technological and craftsmanship significance for the materials and craftsmanship of its grave monuments, which are representative of their period. The cemetery is of contextual significance as a landmark in Linwood and for its combination and arrangement of built and natural elements and features. The cemetery is of archaeological and scientific significance because it has potential to provide archaeological evidence relating to past human activity on the site, including that which dates prior to 1900.

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'THE HEBREW CONGREGATION BURIED IN LINWOOD CEMETERY'

[HTTP://KETECHRISTCHURCH.PEOPLESNETWORKNZ.INFO/SITE/TOPICS/SHOW/2072-THE-HEBREW-CONGREGATION-BURIED-IN-LINWOOD-CEMETERY#.X01q--SP6Uk](http://ketechristchurch.peoplesnetworknz.info/site/topics/show/2072-the-hebrew-congregation-buried-in-linwood-cemetery#.X01q--SP6Uk), FRIENDS OF LINWOOD CEMETERY (2015)

[HTTPS://WWW.KAHURUMANU.CO.NZ/ATLAS](https://www.kahurumanu.co.nz/atlas) 'TE IHUTAI', VIEWED 1 SEPTEMBER 2020

[HTTP://KETECHRISTCHURCH.PEOPLESNETWORKNZ.INFO/SITE/TOPICS/SHOW/2061-A-HISTORY-OF-LINWOOD-CEMETERY#.X72IDY0RrJw](http://ketechristchurch.peoplesnetworknz.info/site/topics/show/2061-a-history-of-linwood-cemetery#.X72IDY0RrJw)

REPORT DATED: 24 SEPTEMBER 2021

PLEASE NOTE THIS ASSESSMENT IS BASED ON INFORMATION AVAILABLE AT THE TIME OF WRITING. DUE TO THE ONGOING NATURE OF HERITAGE RESEARCH, FUTURE REASSESSMENT OF THIS HERITAGE ITEM MAY BE NECESSARY TO REFLECT ANY CHANGES IN KNOWLEDGE AND UNDERSTANDING OF ITS HERITAGE SIGNIFICANCE.

PLEASE USE IN CONJUNCTION WITH THE CHRISTCHURCH CITY COUNCIL HERITAGE FILES.

**CHRISTCHURCH DISTRICT PLAN – SCHEDULED HERITAGE PLACE
HERITAGE ASSESSMENT – STATEMENT OF SIGNIFICANCE
HERITAGE ITEM NUMBER 1439
*DWELLING AND SETTING - 9 FORD ROAD, OPAWA,
CHRISTCHURCH***



PHOTOGRAPH: G. WRIGHT, 10.4.2019

HISTORICAL AND SOCIAL SIGNIFICANCE

Historical and social values that demonstrate or are associated with: a particular person, group, organisation, institution, event, phase or activity; the continuity and/or change of a phase or activity; social, historical, traditional, economic, political or other patterns.

9 Ford Road has high historical and social significance for its connection with first owners, noted plant geneticist Sir Otto Frankel and his wife Margaret Frankel (nee Anderson), an artist and founding member of the Christchurch artistic collective The Group. The dwelling is also of historical and social significance for its connection with prominent architect Ernst Plischke and the 1930s influx of European intellectuals seeking refuge in New Zealand from the rise of Nazism.

Vienna-born Otto Frankel (1900-1998) completed a doctorate in plant genetics in Berlin, Germany in 1925. After working as a plant breeder in Slovakia, and time spent in Palestine and England, he was appointed plant breeder for the new Wheat Research Institute of the Department of Scientific and Industrial Research (DSIR) in 1928. Frankel arrived in New Zealand in 1929 and began work at Lincoln Agricultural College, where the Institute was based. He remained at Lincoln for 22 years, during which time he made a major contribution to the national economy by improving the yield and baking quality of the country's wheat varieties. He was also instrumental in fostering the fields of plant cytology and genetics. In 1950 Frankel was appointed director of the new Crop Research Division of the DSIR, but the following year he left New Zealand to take up the position of head of the Division of Plant Industry at the Commonwealth Scientific and Industrial Research Organisation (CSIRO) in Canberra, Australia. He retired in 1966 and was knighted.

In his long retirement Frankel was internationally acclaimed for his work in promoting the conservation of genetic biodiversity. Otto Frankel was also a pioneer skier, one who skied competitively and helped to establish the Christchurch Ski Club. He divorced his first wife Matilda in 1936, and in December 1939 married Margaret Anderson, whom he had met at the wedding of Frederick and Evelyn Page.

Margaret Lady Anderson (1902-1997) was influential in the art world as an artist, teacher, patron and organiser. She was the daughter of Frederick Anderson, a director of prominent Christchurch engineering firm Andersons Ltd, and is known for taking a leading role in securing the Frances Hodgkin's painting *Pleasure Garden* for the Robert McDougall Art Gallery in 1951. Margaret exhibited more than 100 works, including paintings, drawings, prints and pottery and was elected an artist member of the Christchurch Arts Society (CSA) in 1925, the same year she began study at the Canterbury College School of Art. Two years later she was involved in the founding of artist collective The Group, which held exhibitions at the CSA from 1929. Margaret qualified as a teacher in 1932, after having earlier taught at Rangī Ruru from 1929 and obtaining a Diploma of Fine Arts from the Canterbury College School of Art. In the 1930s she taught at Rangī Ruru and also at Selwyn House and Avonside Girls' High School, where she introduced pottery classes in 1939.

After their wedding, the couple were given a portion of the Anderson family property Risingholme in Opawa on which to build a house. They commissioned noted Austrian-New Zealand architect Ernst Plischke and his wife Anna Plischke to design their new home and garden in c.1939. This was the Plischkes' first private commission in New Zealand (Vial, <https://christchurchartgallery.org.nz/bulletin/205/in-plain-sight>). From 1937-1939 Frankel was secretary of a committee which worked to help Jewish refugees immigrate to New Zealand and he had sponsored the immigration of young Viennese modernist architect Ernst Plischke in May 1939; Frankel knew of Plischke as he had designed his brother's house in Vienna. They had also attended the same school in Vienna, although Plischke was two years behind.

In 1944 the Frankels were instrumental in the establishment of the ground-breaking Risingholme Community Centre in Margaret's former family home. They sold the Ford Road house in 1951 and subsequently moved to Canberra where Margaret continued with pottery and Otto contributed strongly to the promotion of modernist architecture within the Australian Academy of Science and the CSIRO in Canberra for the next two decades.

9 Ford Road has changed hands a number of times since 1951. Widow Hazel Mulligan purchased it from the Frankels and on her death it passed to her son Robert in 1960. Molly Kirby was the owner in 1969, then it passed to architectural draughtsman William Crawford and his wife Barbara in 1980. The house incurred some minor earthquake damage in 2011.

CULTURAL AND SPIRITUAL SIGNIFICANCE

Cultural and spiritual values that demonstrate or are associated with the distinctive characteristics of a way of life, philosophy, tradition, religion, or other belief, including: the symbolic or commemorative value of the place; significance to Tangata Whenua; and/or associations with an identifiable group and esteemed by this group for its cultural values.

9 Ford Road has cultural significance for its association with the way of life of the Frankels, key progressive figures in Christchurch's artistic and cultural life, and the lifestyle of Christchurch's arts community in the mid-twentieth century. It is also of cultural significance as it reflects the ideals of Modernist architecture in its design, which were later articulated by Plischke in his influential publications *About Houses* (1943) and *Design and Living* (1947). Modernism was a philosophical movement that emerged from the industrialisation of the nineteenth century, and which considered that traditional values were inappropriate in the new industrial context. It proposed therefore the reshaping and improvement of society guided by rational thought, science and technology. The house also has cultural significance for its associations with the cultural values of European refugees who settled in New Zealand in the war period.

ARCHITECTURAL AND AESTHETIC SIGNIFICANCE

Architectural and aesthetic values that demonstrate or are associated with: a particular style, period or designer, design values, form, scale, colour, texture and material of the place.

9 Ford Road has architectural and aesthetic significance as one of the first examples of Modernist residential architecture in Christchurch, and the first New Zealand residential design from significant Austrian-New Zealand architect Ernst Plischke. It is also of architectural significance as it became the prototype for the ideas outlined in Plischke's later publications on modernist housing.

Ernst Plischke (1903-1992) was a key figure in the introduction of Modernist architecture to New Zealand. He is known particularly for his house designs, the office building Massey House (date) and his contributions to church design. Born and educated in Vienna, Plischke began his career in 1926 working for Peter Behrens. In 1930 he built his most significant Austrian building, a Vienna office block that received wide publicity at the time. Although he had built an international reputation, employment opportunities dwindled during the 1930s as Plischke's socialist affiliations and Jewish wife encountered the rise of Nazism. The family immigrated to New Zealand in 1939 and settled in Wellington.

In New Zealand Plischke was first employed by the Department of Housing Construction as an architectural draughtsman designing multiple unit blocks. In 1942 he became a community planner, designing towns and shopping and community centres for new dormitory suburbs. During his years of government employment, Plischke lectured and wrote several influential publications on modern architecture – including key instructive publications which introduced modernism to New Zealand architecture - *About Houses* (1943), and *Design and Living* (1947). He designed the Frankel House whilst working as a state employee. In 1947 Plischke went into private practice, and over the next decade he designed more than forty houses and the landmark Massey House, Wellington's first modern high-rise. Never registered as an architect in New Zealand, he returned to Vienna in 1963 to become Professor of Architecture at the Academy of Fine Arts.

9 Ford Road (1939-1940) was the first of Plischke's houses he designed independent of the Department of Housing Construction. Originally the house was a single-storey 'L'-shaped flat-roofed building with austere form and detailing and a gallery/sun porch in place of the traditional hall. The Frankel home was radical in the context of the time and place in which it was built and Otto Frankel claimed it to be the 'first modern house in Christchurch' (Milton Cameron, p.32).

The house reflects the design features and ideas later outlined in Plischke's publication *About Houses* (1943): the L-shaped plan; the lack of a traditional hall; the orientation to maximise light, which involved turning the living areas away from the street and towards the garden and midday sun; bookshelves around the fireplace; bands of windows; flat roof; and the careful use and selection of material, colour and proportion. The illustrations used in *About Houses* closely match the Frankel house. Plischke also used the house as an example of good contemporary architecture in his later book *Design and Living*, without stating it was his design.

The original dwelling was simple yet finely detailed on the exterior. Tubular handrails with an industrial aesthetic, and random stone (crazy) paving and steps lead to entrances. The rough sawn rusticated weatherboard cladding is detailed so as to emphasize the simplicity of the surfaces and form. The house originally featured large, timber-framed sliding doors; these have since been replaced in modern aluminium. Some original windows remain. The house was incrementally added to from as early as the 1960s, when additions were made to the west side. A significant addition occurred in the 1980s which included a partial first floor over the southeast corner of the original house. A carport, garden room and visitors' bedroom were in situ by the early 1990s. A garage/office was consented in 1995 and extends along the west boundary. The additions which post-date 1980 are not considered to be of heritage value. Despite these additions and alterations which have reduced the design aesthetic and architectural integrity of the dwelling, the original house is still distinguishable.

Interior heritage fabric includes the remaining original layout and spaces, structure and linings, fixtures, hardware, materials and finishes. The interior features original light switches and light fittings. There have been alterations to many of the spaces, however the lounge room with fireplace tiles and built-in shelving remains intact. Original floorboards are exposed in the living area. The remaining original features and detailing of the interior reflects the way of life and desired modernist aesthetic of the original owners.

TECHNOLOGICAL AND CRAFTSMANSHIP SIGNIFICANCE

Technological and craftsmanship values that demonstrate or are associated with: the nature and use of materials, finishes and/or technological or constructional methods which were innovative, or of notable quality for the period.

9 Ford Road has craftsmanship significance as an early example of the use of representative of traditional building materials, techniques and skills for what was a markedly different building design for the period.

CONTEXTUAL SIGNIFICANCE

Contextual values that demonstrate or are associated with: a relationship to the environment (constructed and natural), a landscape, setting, group, precinct or streetscape; a degree of consistency in terms of type, scale, form, materials, texture, colour, style and/or detail; recognised landmarks and landscape which are recognised and contribute to the unique identity of the environment.

9 Ford Road has contextual significance on its site. The setting of the house includes the immediate land parcel, a large established suburban section. In line with Modernist architectural thought and planning, the house is set close to its southern, road boundary, and opens to the north to provide maximum privacy and sunlight. Vegetation largely obscures the street elevation of the property.

At this stage of research it is unknown which aspects of Anna Plischke's original landscape design remain. Stone steps, paving and retaining walls are a key feature of the garden. The house sits on an established garden section, including mature trees that previously formed part of the Risingholme estate. Risingholme is located to the north of the property; its mature grounds also contain another building from the same period as 9 Ford Road with a similar modernist design aesthetic, Risingholme Community Centre Hall (Paul Pascoe, 1947). The dwelling is set within streets of more conventional mid-century suburban dwellings. The neighbouring property and other properties in 9 Ford Road, all share similar stone walls along the street boundary.

ARCHAEOLOGICAL AND SCIENTIFIC SIGNIFICANCE

Archaeological or scientific values that demonstrate or are associated with: the potential to provide information through physical or scientific evidence an understanding about social historical, cultural, spiritual, technological or other values of past events, activities, structures or people.

9 Ford Road and its setting are of archaeological significance because they have the potential to provide archaeological evidence relating to mahinga kai practices, past building construction methods and materials, tree planting, and other human activity on the site, including that which occurred prior to 1900.

The house is located in the vicinity of Ōpāwahi Heathcote River, which gave the suburb of Opawa its name. Ōpāwaho was also the name of a pā on the riverbank between what is now Judge Street and Vincent Place, which was used as a resting place by Ngāi Tahu travelling between Kaiapoi and Horomaka/Te Pātaka-a-Rākaihautū (Banks Peninsula). The river was part of the interconnected network of ara tawhito (traditional travel routes) that crossed the once-widespread wetland system of greater Christchurch. The river, and its immediate area, was an important kāinga mahinga kai (food-gathering place) where native fish, birds and plants were gathered (Ōpāwaho, Kā Huru Manu). The house stands on part of the former grounds of Risingholme, a house dating from the 1860s, and the setting includes mature trees which were originally part of the Risingholme property.

ASSESSMENT STATEMENT

9 Ford Road, its setting and noted interior features are of overall significance to the Christchurch district, including Banks Peninsula.

The dwelling has high historical and social significance for its connection with first owners, noted plant geneticist Otto Frankel and influential artist, educator and patron Margaret Frankel (nee Anderson), as well as with its designer Ernst Plischke and the phenomena of the influx in the 1930s of European intellectuals seeking refuge from the rise of Nazism. The dwelling has cultural significance as an example of the early appearance of Modernist architecture in Christchurch and for the capacity it has to illustrate the lifestyle of Christchurch's forward thinking art community in the mid-twentieth century. It is also of cultural significance as it reflects the ideals of Modernist architecture in its design, which were later articulated by Plischke in his influential publications *About Houses* and *Design and Living*. The dwelling has architectural and aesthetic significance as one of the first examples of Modernist architecture in Christchurch, commissioned by notable clients, the Frankels, and as the first New Zealand design by noted Austrian-New Zealand architect Ernst Plischke. It is also of architectural significance as it reflects the ideas outlined in Plischke's later publications on ideals of modernist housing and was used as an example in these publications. The dwelling has contextual significance for its placement and orientation on the site, its mature trees, and stone paths and retaining walls. 9 Ford Road and its setting are of archaeological significance because they have the potential to provide archaeological evidence relating to mahinga kai practices, building construction methods and materials, tree planting, and other human activity on the site, including that which occurred prior to 1900.

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REPORT DATED: 13 October 2021

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PLEASE USE IN CONJUNCTION WITH THE CHRISTCHURCH CITY COUNCIL HERITAGE FILES.

**CHRISTCHURCH DISTRICT PLAN – SCHEDULED HERITAGE PLACE
HERITAGE ASSESSMENT – STATEMENT OF SIGNIFICANCE
HERITAGE ITEM NUMBER 1457
CARLTON BRIDGE AND SETTING -
HARPER AVENUE, BEALEY AVENUE, CARLTON MILL ROAD,
PARK TERRACE INTERSECTION, CHRISTCHURCH**



Photo: Christchurch City Council, 2017

The Carlton Bridge and setting are of overall Significance to Christchurch and Banks Peninsula.

The bridge and setting are of historical and social significance for its construction in 1929, which replaced an earlier timber bridge. The bridge is of historical and social significance as part of a network of historic central city Avon Bridges, built by the Council and designed not only to be functional, but also to be ornamental and provide evidence of permanency and progress. Many of the city's other early timber bridges had been replaced in the 1880s. There was a period of bridge construction in the years following a comprehensive review of the City's bridges by City Engineer Augustus Galbraith in 1928 in which the earlier Carlton Bridge was identified as being in a poor state. . An estimate to build a new bridge of 8000 pounds was arrived at, and a Roothing Loan was obtained. Carlton Bridge was the first bridge to be financed by such a loan. Tenders were called in late 1928, with Fred Williamson the successful contractor. The bridge was opened on 29 September 1929 by the Mayor J.K Archer.

The bridge and setting are of cultural and spiritual significance as an expression of the confidence and pride Christchurch's citizens took in their city in the late 1920s. The site of the Carlton Bridge has significance to tangata whenua as the Ōtākaro -Avon River was highly regarded as a mahinga kai area by Waitaha, Ngāti Māmoe and Ngāi Tahu. Ōtākaro, meaning "the place of play or a game", is so named after the children who played on the river's banks as the food gathering work was being done. The Waitaha pā of Puari once nestled on its banks. In Tautahi's time few Māori would have lived in the Ōtākaro area itself. Those that did were known to Māori living outside the region as Ō Roto Repo (swamp dwellers). Most people were seasonal visitors to Ōtākaro. Hagley Park is of cultural and spiritual significance for tangata whenua who trace their association with the landscape back to the first Māori inhabitants of up to 1000 years ago. The Avon River/Ōtākaro which intersects the Park was an important mahinga kai and traditional travel route for Waitaha, Ngāti Māmoe and Ngāi Tahu. Little Hagley Park was an established resting and meeting place used mostly by Ngāi Tūāhuriri travelling between Kaiapoi and Banks Peninsula. Their historic use of Little Hagley Park continued throughout the 1860s, most notably in 1868 when it was used by up to 150 hapū members as a base during the Native Land Court hearings.

The bridge and setting are of architectural and aesthetic significance for its engineering design by Walter Gordon Morrison OBE (1903-1983) and its classical style. It is constructed of reinforced concrete of a single span of 50 feet and a width of 60 feet. The bridge is neoclassical in style, with urn shaped concrete balusters and dentil detailing. Morrison designed and supervised the construction of a number of bridges for the Christchurch City Council. He worked for the Lyttelton Harbour Board and the Christchurch City Council after graduation until leaving New Zealand in 1932. In 1946, having returned, he established W.G.Morrison and Partners (later Morrison, Cooper and Partners). The design was criticised at the time of its construction for the poor visibility it allowed motorists. It would appear that the design and busyness of the intersection also contributed to this perception of danger, and concerns with the road safety of the intersection and bridge were also a topical issue in the 1960s. Alterations were made to the bridge in 1960 when traffic lights were installed at the intersection – the original four standard lamps were removed. The bridge was restored in 1984 with plaster repairs and a cement wash coating. It was repaired and repainted in 2022.

The bridge is of high technological and craftsmanship significance for the quality of engineering and craftsmanship employed in the design and construction. Of particular note is the engineering design. The engineer Gordon Morrison published a technical paper on the bridge which was published by the Institute of Civil Engineers. The bridge was an early use of rigid frame design, and had to withstand heavy loading. It was constructed without expansion joints – although one had been installed on the downstream side by November 1932.

The bridge is of high contextual significance for its location at a busy intersection adjacent to Hagley Park, and Little Hagley Park. It is a highly visible landmark in its own right, and as an integral part of the Hagley Park and inner-city riverbank environment. The setting of the Bridge consists of the areas of river and riverbank, grassed areas, trees and woodland which extend to either side and provide for views to and from the bridge.

The bridge and setting are of archaeological significance for their potential to provide evidence of human activity, including by Waitaha, Ngāti Māmoe and Ngāi Tahu, and activity that related to construction and the river. European activity is recorded on the site prior to 1900, including an earlier bridge on the site.

References – Christchurch City Council Heritage Files; A City of Bridges, John Ince.

REPORT DATED: 13 JUNE 2022

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PLEASE USE IN CONJUNCTION WITH THE CHRISTCHURCH CITY COUNCIL HERITAGE FILES.

**CHRISTCHURCH DISTRICT PLAN – SCHEDULED HERITAGE PLACE
HERITAGE ASSESSMENT – STATEMENT OF SIGNIFICANCE
HERITAGE ITEM NUMBER 1458
HEREFORD STREET BRIDGE AND SETTING -
HEREFORD STREET, BETWEEN CAMBRIDGE-OXFORD,
CHRISTCHURCH**

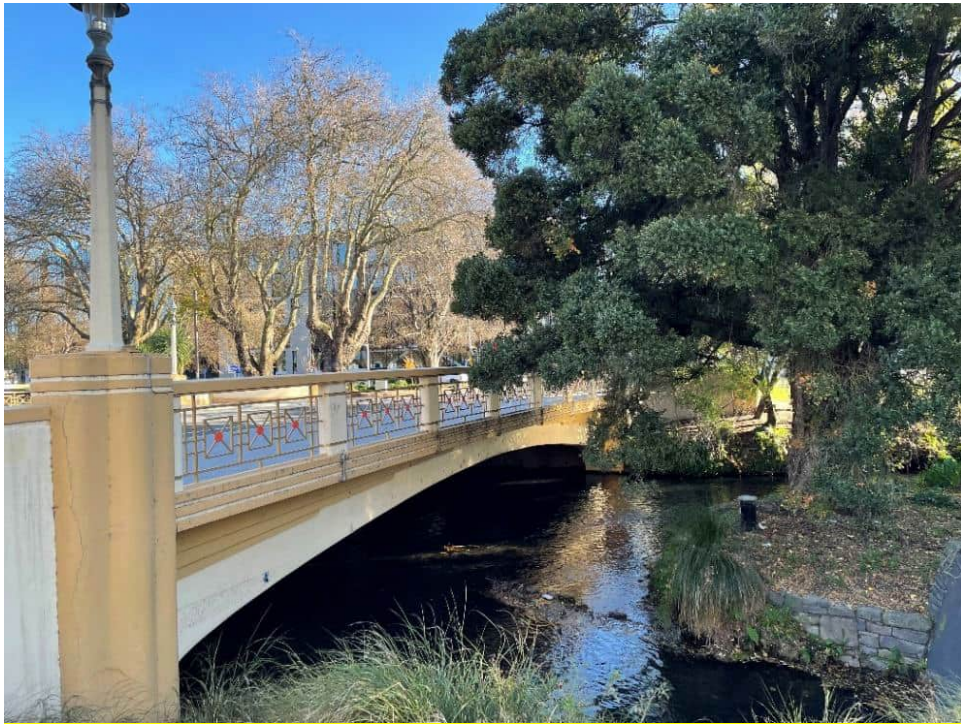


Photo: A Ohs 10/6/2022

The Hereford Street Bridge and setting are of overall Significance to Christchurch and Banks Peninsula.

The Hereford Street Bridge and setting are of historical and social significance for the construction of the bridge in 1937, which replaced the earlier timber bridge dating from the 1870s. The bridge is of historical and social significance as part of a network of historic central city Avon Bridges, built by the Council and designed not only to be functional, but also to be ornamental and provide evidence of permanency and progress. Many of the city's other early timber bridges had been replaced in the 1880s. There was a period of bridge construction in the years following a comprehensive review of the City's bridges by Augustus Galbraith in 1928. The earlier Hereford Street bridge was identified as being in a poor state in 1934, but the replacement was delayed due to lack of finances. Test bores for the new bridge were done in 1936, and tenders were called in August 1937, with C.S Luney the successful tenderer. The bridge was built at a cost of 4665 pounds which was funded through a loan from the Municipal Electricity Department. The bridge was completed by March 1938 and was officially opened on 24 March by Mayoress Mrs Beanland. A bridge had been located on the site since 1859. Two tablets on the bridge mark the new bridge and the 1875 bridge. The construction of the bridge resulted in the reduction of the extent of Mill Island. The bridge incurred minor

damage in the Canterbury Earthquakes 2011, including cracking of the concrete walls. This damage was repaired in c2021.

The Hereford Street Bridge and setting are of cultural and spiritual significance as the bridge is an expression of the confidence and pride Christchurch's citizens took in their city in the 1930s. The bridge features two plaques – one acknowledging the previous bridge (its construction and dismantling) and one marking the date and key people associated with the construction and opening of the present bridge. The site of the Hereford Street Bridge has significance to tangata whenua as the Ōtākaro (Avon River) was highly regarded as a mahinga kai area by Waitaha, Ngāti Māmoe and Ngāi Tahu. Ōtākaro, meaning "the place of play or a game", is so named after the children who played on the river's banks as the food gathering work was being done. The Waitaha pā of Puari once nestled on its banks. In Tautahi's time few Māori would have lived in the Ōtākaro area itself. Those that did were known to Māori living outside the region as Ō Roto Repo (swamp dwellers). Most people were seasonal visitors to Ōtākaro.

The Hereford Street Bridge and setting are of architectural and aesthetic significance for the Moderne style of the bridge, which is executed in plastered concrete and iron. The bridge features solid curved walls at each end which integrate it into the adjacent riverbank reserves. These feature simple horizontal recessed detailing. At the South end of the bridge, freestanding walls in the same design create an entrance to the riverbank reserve. The piers are also curved on the edges. Two lighting poles are located on top of the two end piers on each side of the bridge. The span across the river is arched, and features restrained incised horizontal detailing, reflecting the Moderne style. The metal balustrade infills have a simple geometric design with squares, triangles and circles. The design, construction and materials of the bridge represents a departure from the Victorian era stone and iron bridges, in its simplicity, modernity and curved lines. City engineer A.R Galbraith is acknowledged on the plaque, however Travis M Stanton is identified as the designer for the bridge (A City of Bridges, John Ince, p.28). Stanton (1922-96) studied engineering at Canterbury University, and after graduating worked in the City engineer's department at the Christchurch City Council. In addition to the Hereford Street Bridge he designed the Barrington Bridge (1935). Stanton later taught at the Canterbury University School of Engineering, and in 1949 joined with architects Manson and Seaward to found the well-regarded firm of Manson Seaward and Stanton. The lamp globes have been replaced with a different design at some point – they were originally more rounded in design. The parapets and wings of the bridge were designed to give traffic moving towards the bridge a clear view of traffic moving towards the approaches. The new bridge was nearly twice as wide as the earlier bridge.

The bridge is of technological and craftsmanship significance for the quality of engineering and craftsmanship employed in the design and construction. Of particular note is the concrete construction with steel reinforcing and the incised horizontal detailing. The bridge was constructed of reinforced concrete of a type known as 'rigid frame' or 'square arch.' The contractor C.S.Luney is well known for executing quality construction in the city.

The bridge is of high contextual significance for its location adjacent to Mill Island which historically housed a flour mill. It is a highly visible landmark in its own right, and as an integral part of the inner-city's riverbank environment, relating particularly to its neighbouring heritage features – the Bridge of Remembrance, Mill Island and the former Public Trust building. The setting of the Hereford Street Bridge consists of the areas of river and riverbank, grassed areas and trees which extend below the bridge and to its north and south and provide for views to and from the bridge. The bridge crosses the Avon River on an east-west orientation. Cambridge Terrace runs to the west

of the bridge and Oxford Terrace to the east. The riverbank parks were landscaped around the same time as the bridge was constructed, including the low brick walls.

The bridge and setting are of archaeological significance for their potential to provide evidence of human activity, particularly that related to construction, and activities related to the river. The site of the Hereford Street Bridge has significance to tangata whenua as the Ōtākaro (Avon River) was highly regarded as a mahinga kai area by Waitaha, Ngāti Māmoe and Ngāi Tahu. European activity is recorded on the site prior to 1900.

References – CCC Heritage Files; A City of Bridges, John Ince; CCC Archives.

REPORT DATED: 10 JUNE 2022

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PLEASE USE IN CONJUNCTION WITH THE CHRISTCHURCH CITY COUNCIL HERITAGE FILES.

**CHRISTCHURCH DISTRICT PLAN – SCHEDULED HERITAGE PLACE
HERITAGE ASSESSMENT – STATEMENT OF SIGNIFICANCE
HERITAGE ITEM NUMBER 1435
*COMMERCIAL BUILDING AND SETTING -
167 HEREFORD STREET, CHRISTCHURCH***



PHOTOGRAPH: B. Smyth, 29.10.2012

HISTORICAL AND SOCIAL SIGNIFICANCE

Historical and social values that demonstrate or are associated with: a particular person, group, organisation, institution, event, phase or activity; the continuity and/or change of a phase or activity; social, historical, traditional, economic, political or other patterns.

167 Hereford Street has historical and social significance as one of the last remaining links with the historic development of Hereford Street, the city's former business, professional and financial hub. The building also has historic and social significance for its connection with lawyer and public figure James Flesher and his long-standing legal practise.

The land on which the present building was constructed, Town Section 748, was owned by merchant George Gould in c.1878 when Robert Wilkin, a general merchant, wool auctioneer and stock and estate agent, was the lessee. Wilkin had architect Frederick Strouts design a three storey masonry seed store for his business at the rear of the section in 1881. Strouts also designed an office for Wilkin for the Hereford Street frontage of the site but this was unrealized at the time of Wilkin's sudden death in 1886. A small weatherboard building was subsequently constructed on the site.

At the turn of the twentieth century, Hereford Street was well established as the city's financial, professional and head office precinct. As the local economy boomed in this period and demand for space grew, the district expanded eastward across Manchester Street and significant redevelopment occurred in that immediate area. The small National Bank at the northwest corner of Manchester Street, for example, was doubled in size in 1904 and,

diagonally across the intersection, the New Zealand Express Company opened what was then the country's tallest building in 1906.

Next door to the enlarged National Bank, TS 748 was subdivided by owner Gertrude Macdonald in 1907 and the southern portion was sold to barrister and solicitor James Flesher. Flesher immediately commenced a new building to house his decade-old law firm. 144-144a (later 167-169) Hereford Street was completed in early 1908. Over the next 75 years, three generations of Fleshers operated their well-respected legal practise from chambers on the first floor.

As well as being a prominent city lawyer, James Arthur Flesher (1865-1930) was a leading public figure in Christchurch in the early twentieth century – serving a number of local bodies and charitable causes in various capacities over 40 years. Notably, he was Mayor of New Brighton Borough in 1915-1917 and of Christchurch City (1923-1925). The Flesher family home was *Avebury* in Richmond, a property that has been in City Council ownership since 1951.

In 1908 when Flesher relocated from the National Mutual Life Building in Cathedral Square, he brought fellow tenants the Royal Exchange Assurance Corporation with him. This insurance company occupied ground floor premises at 167 Hereford Street for more than fifty years until the early 1960s. The other founding tenants were auctioneers and estate agents Ford and Hadfield, and coal merchant Thomas Brown Ltd (which remained until the 1940s). Another notable early tenant was well-known architectural practise the England Brothers, who moved in in 1916 and remained until dissolution of the firm in 1941.

Between 1908 and the 1980s, 167 Hereford Street was home to several lawyers and law firms – most notably J. A. Flesher & Son, and also at various times Garrick, Cowlishaw & Clifford, P. H. Alpers and Peter Dyhrberg. During the same period the building also housed several insurance companies – Royal Exchange Assurance, NZ Plate Glass Insurance, Guardian Assurance, Southern Union General Insurance and Metropolitan Life Assurance. The consistent cohabitation of these firms in the building over many years, as well as their co-location in Hereford Street with other providers of professional services, financial institutions and company head offices, serves to illustrate the close relationship between law and insurance in the early and mid-twentieth century.

In 1983 167 Hereford Street passed out of Flesher family ownership for the first time when it was sold to Industrial Holdings Ltd. J. A. Flesher & Son subsequently moved across Hereford St to Epworth Chambers. 167 Hereford Street remained as professional offices until popular café and bar *Americanos* opened on the ground floor in 1991. Within a couple of years it was the building's only tenant and the first floor was largely empty – which was common for many of the city's older buildings at this time.

On 30 December 1996, a deliberately-lit fire gutted the building, the extent of damage threatening the viability of the building. However in 1999, high-profile businessman Mike Pero purchased the shell and undertook a major restoration with the assistance of a Christchurch City Council Heritage Incentive Grant. The following year 167-169 Hereford Street reopened as the national headquarters for Mike Pero Mortgages. A café – *Mancini's Coffee* – also occupied part of the ground floor.

167 Hereford Street sustained significant damage in the Canterbury Earthquakes 2010-2011. After the major quake of 22 February 2011, the building was cleared of tenants. Having relocated his company elsewhere in 2003, Mike Pero had attempted to sell the building by auction prior to the earthquakes. The damaged building was sold in August 2011 to a local property investor who repaired and strengthened the building, completing the work in 2021.

CULTURAL AND SPIRITUAL SIGNIFICANCE

Cultural and spiritual values that demonstrate or are associated with the distinctive characteristics of a way of life, philosophy, tradition, religion, or other belief, including: the symbolic or commemorative value of the place; significance to Tangata Whenua; and/or associations with an identifiable group and esteemed by this group for its cultural values.

167 Hereford Street has cultural significance for its long association with the legal fraternity and the insurance industry. It reflects the distinctive culture, traditions and way of life of the city's professional classes as a purpose built building commissioned and designed for a multi-generational legal firm, designed to incorporate other complimentary businesses such as insurance. The building was designed to reflect the prestige and position of both the foundation law firm and the associated insurance and legal businesses that occupied the building.

ARCHITECTURAL AND AESTHETIC SIGNIFICANCE

Architectural and aesthetic values that demonstrate or are associated with: a particular style, period or designer, design values, form, scale, colour, texture and material of the place.

167 Hereford Street has architectural and aesthetic significance as an Edwardian commercial building. Since the Canterbury Earthquakes, such buildings have become rare in Christchurch and 167 is the sole survivor of its type and era in Hereford Street. The building is likely to be the work of little-known Christchurch architect Alfred Fielder.

The architect of the building is unconfirmed due to a lack of documentation. Alfred Fielder is a possibility as he invited tenders for a two-storey brick and stone office building on Hereford Street in May 1907 (the building was completed in 1908); the materials and elements of the style are consistent with what is known of Fielder's commercial architecture. In addition Fielder was connected with Glanville, the architect who had designed the Flesher family home, taking over the practice of Glanville, McLaren and Anderson in 1905.

Alfred William Fielder (1858-1941) studied at the Canterbury College School of Art before beginning his own architectural practice in 1893. Known designs include the Catholic churches in Halswell and Addington (both 1898), the Anglican church in Hornby (1906), Sheffield Presbyterian Church (1909), the Treleaven and Hayward office in Victoria Square (1910) and buildings at the A & P Showgrounds (1911). He also designed a large number of homes, particularly in Merivale and St Albans. In 1912 Fielder sold up and moved to Morrinsville where he worked as an architect and as a building inspector for Morrinsville Borough Council.

167 Hereford Street related to the neighbouring former Wilkin & Co seed store (Strouts, 1881) in its use of brick for the façade, and the design of the ground floor windows. The effect of this relationship was enhanced by the fact that 167 Hereford Street has two articulated facades due to its location on a lane to the west.

167 Hereford Street exhibits aspects typical of Edwardian Free Style architecture. The Free Style constituted the translation of the principles of the Arts and Crafts movement to commercial and institutional architecture. It was characterised by an eclectic combination of elements and details drawn or adapted from a variety of historical styles. 167 Hereford Street features contrasting materials (white limestone and red brick) and a variety of window forms used in combination (oriel, round and segmental arches with variegated voussoirs). This style was evident in early twentieth century central Christchurch, including in Hereford Street. Today the former Flesher's building is the only remaining building of this style in Hereford Street.

After the 1996 fire that gutted the interior, new owner Mike Pero undertook an extensive restoration and seismic upgrade during early 2000. Although this upgrade prevented collapse in the Canterbury Earthquake sequence of 2010-2011, the building again sustained significant damage. Facades bowed, parapets were loosened, and the eastern wall pulled away and was later partially demolished. After critical make-safe works were carried out in 2012, 167 Hereford Street sat unrepaired for the best part of a decade. Repair and additional seismic upgrade works were commenced in early 2020 and completed in 2021.

TECHNOLOGICAL AND CRAFTSMANSHIP SIGNIFICANCE

Technological and craftsmanship values that demonstrate or are associated with: the nature and use of materials, finishes and/or technological or constructional methods which were innovative, or of notable quality for the period.

167 Hereford Street has technological and craftsmanship significance because it demonstrates the high level of skill exhibited by stonemasons, bricklayers and other building crafts in turn-of-the century Christchurch. Since the Canterbury Earthquake sequence, only a handful of buildings remain in the city centre to demonstrate the craftsmanship of the nineteenth and early twentieth centuries. This building has a bluestone foundation course to align with that of the adjacent Victorian seed store while Oamaru limestone dressings provide a strong contrast with red brick walls. Two oriel windows contain coloured leadlight top-lights – a typical Edwardian flourish.

CONTEXTUAL SIGNIFICANCE

Contextual values that demonstrate or are associated with: a relationship to the environment (constructed and natural), a landscape, setting, group, precinct or streetscape; a degree of consistency in terms of type, scale, form, materials, texture, colour, style and/or detail; recognised landmarks and landscape which are recognised and contribute to the unique identity of the environment.

167 Hereford Street has contextual significance for its prominence in the streetscape and relationship to the former seed store to its rear. Its site and setting are contiguous. The building is located on the north side of Hereford Street at the corner of what is now Tramway Lane. This corner location gives the building two street frontages, which, together with its distinctiveness in terms of its materials and detailing, make it a landmark in the streetscape. 167 Hereford Street has a degree of consistency with the adjacent former Wilkin's Seed Store in Tramway Lane, a three-level masonry warehouse. This historical pairing contributes to the identity of this part of the central city, particularly in light of the small number of remaining cluster of historic buildings in the central city as a result of the Canterbury Earthquakes. The relationship between professional office and (unrelated) warehouse illustrates the intensive and diverse nature of the nineteenth and early twentieth century city centre. The block on which 167 Hereford Street stands features a number of heritage buildings, including the former Trinity Congregational Church, the relocated Shand's Building (an earlier generation of professional office), and two early-twentieth century government buildings.

ARCHAEOLOGICAL AND SCIENTIFIC SIGNIFICANCE

Archaeological or scientific values that demonstrate or are associated with: the potential to provide information through physical or scientific evidence and understanding about social historical, cultural, spiritual, technological or other values of past events, activities, structures or people.

167 Hereford Street and its setting are of archaeological significance because they have the potential to provide archaeological evidence relating to past human activity on the site including that which occurred prior to 1900. Prior to construction in 1907-1908, documentation shows that 167 Hereford Street was the location of a modest timber building, probably built in the years following the opening of the adjacent seed store in 1881.

ASSESSMENT STATEMENT

167 Hereford Street and setting are of overall significance to the Christchurch district including Banks Peninsula.

The building has historical and social significance as one of the last remaining links with Christchurch's former business, professional and financial district; and also for its connection with James Flesher and his long-standing law practise. The building is of cultural significance for its long association with the legal fraternity and the insurance industry. It reflects the distinctive culture, traditions and way of life of the city's professional classes as a purpose-built building commissioned and designed for a multi-generational legal firm and incorporating other complimentary businesses. The building is of architectural and aesthetic significance as a rare surviving example of an Edwardian office building designed in the Free Style, possibly

by AW Fielder. The building is of technological and craftsmanship significance as a high quality example of contemporary masonry skills. The building has contextual significance due to its design and relationship with the neighbouring former seed store building and as a landmark with two street frontages. The building is of archaeological significance because it has the potential to provide archaeological evidence relating to past human activity on the site including that which occurred prior to 1900.

REFERENCES:

Apperly, R; Irving, R; Reynolds, P *A Pictorial Guide to Identifying Australian Architecture: styles and terms from 1788 to the present* Angus and Robertson, 1994.

Dunham, L. [research summary] in *167 Hereford Street* Unscheduled heritage file, Christchurch City Council.

167 Hereford St Unscheduled Heritage File, Heritage Team, Christchurch City Council.

REPORT DATED: 4 October 2021

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PLEASE USE IN CONJUNCTION WITH THE CHRISTCHURCH CITY COUNCIL HERITAGE FILES.

**CHRISTCHURCH DISTRICT PLAN – SCHEDULED HERITAGE PLACE
HERITAGE ASSESSMENT – STATEMENT OF SIGNIFICANCE
HERITAGE ITEM NUMBER 1403
*COMMERCIAL BUILDING AND SETTING, FORMER BANK
OF NEW ZEALAND, 129 HIGH STREET, CHRISTCHURCH***



PHOTOGRAPH: CHRISTCHURCH CITY COUNCIL 2022

HISTORICAL AND SOCIAL SIGNIFICANCE

Historical and social values that demonstrate or are associated with: a particular person, group, organisation, institution, event, phase or activity; the continuity and/or change of a phase or activity; social, historical, traditional, economic, political or other patterns.

The commercial building and setting at 129 High Street are of historical and social significance for their connection with retail and banking services in the historically prime retail area of the central city – High Street. They are also significant for their connection with Adelaide Fenerty and the Armstrong family.

The building comprising three shops was commissioned by milliner and property owner Adelaide Fenerty (c.1877-1942) in 1926. Fenerty was the eldest daughter of Thomas and Mary Armstrong, successful drapers in the city from c.1882, who established T. Armstrong and Co; drapers, milliners and importers of menswear. She had married to Reginald Fenerty, an accountant, in 1901. The couple divorced in 1903 but Mrs Fenerty retained her married name. The building at 129 High Street evidences her success in business, and the important contribution that women in business played in the local economy. She died in 1942 at her home in Latimer Square, having built up a considerable commercial property portfolio in both Christchurch and Ashburton.

The building was completed in November 1926 and in May 1928 it was leased by the Bank of New Zealand to house its Lower High Street 'Daily Receiving Agency'. In 1933 the bank occupied the corner space and 'Judith Cake Shop' occupied the westernmost shop; the building was known as 'Armstrong's Corner' at this time. Armstrong's Department Store occupied buildings across the road.

The BNZ's central Christchurch branch had been located at the corner of Colombo and Hereford Streets since 1866, the bank having first opened its doors in Christchurch in 1862. All the main banks established large centrally-located buildings which customers from all over Christchurch travelled to. The late 1920s appeared to be a time of expansion for the BNZ, as it opened four other receiving agencies in Christchurch suburbs in 1927-1928. The High Street agency accommodated all the regular banking activities undertaken at its branches, with local businesses in the Ferry Road vicinity the focus of its services. By the mid-20th century suburban branches of the BNZ had also opened in malls and shopping centres.

In April 1950 the BNZ purchased the building from Fenerty's estate. The bank continued to operate out of the building for the next forty years. In October 1991 it sold the building to Spot On Enterprises which opened Ace Video - a camera/security services and video rental business which operated until the Canterbury Earthquakes in 2010-2011.

The building sustained minor damage as a result of the Canterbury Earthquakes. Spot On Enterprises subsequently sold the property which was then repaired, strengthened and altered in 2020/21 to accommodate two residential units on the upper floors, and retail premises on the ground floor.

CULTURAL AND SPIRITUAL SIGNIFICANCE

Cultural and spiritual values that demonstrate or are associated with the distinctive characteristics of a way of life, philosophy, tradition, religion, or other belief, including: the symbolic or commemorative value of the place; significance to Tangata Whenua; and/or associations with an identifiable group and esteemed by this group for its cultural values.

The building has cultural significance for its long association with the Bank of New Zealand in Christchurch from 1928-1990s, and for its connection to a woman business owner. The secure management of finances provided by banks such as the BNZ continues to be a characteristic of everyday life for New Zealanders and plays an important role in the financial system and the economy. The ground floor safe is tangible interior evidence of this connection. It also has cultural significance for its development and association with Adelaide Fenerty as evidence of the successful involvement of women in business in Christchurch during this period.

The building is located on the traditional Ngāi Tahu route to the north, which later became a principal transport route for early European settlers.

ARCHITECTURAL AND AESTHETIC SIGNIFICANCE

Architectural and aesthetic values that demonstrate or are associated with: a particular style, period or designer, design values, form, scale, colour, texture and material of the place.

The building is of architectural and aesthetic significance for its design in the Classical style with Art Deco influences, by the Luttrell Brothers.

The building is a two-storey building originally designed as three shops. It was designed in a restrained classical style, with cornices, modillions and a central extended parapet on the two main elevations, topped with flagpoles and flanking acroteria. As built, the external walls of each shop were glazed and the pilasters at first floor level were rendered to look like masonry blocks. A return canopy was suspended below the top lights of the ground floor. Construction is of reinforced concrete, with framing of steel beams and columns, concrete pad foundations and a concrete roof slab lined with iron. Harcourt granite from Australia was used for the facings at the main entrances.

The Luttrell Brothers also designed the two-storey Colombo Street building for T. Armstrong and Co. in 1905 (demolished). Alfred and Sidney Luttrell settled in the city in 1902 and became particularly known for their commercial architecture, racing grandstands and Catholic churches. The Luttrell Brothers' chief contribution to New Zealand architecture was the introduction of the 'Chicago Skyscraper' style with the Lyttelton Times building in Cathedral

Square (1902, demolished), and the New Zealand Express Company buildings in Manchester Street (1905-7, demolished) and Dunedin (1908-10).

The Fenerty building has undergone various alterations over time, although the first floor façade retains a high degree of integrity and authenticity. Major alterations were undertaken in 1954, designed by local architect Gerald Bucknell (1903-1983), who had worked in partnership with Cecil Wood prior to establishing his own practice. Bucknell designed a number of premises for the BNZ in Canterbury. The 1954 alterations converted the building from separate shops into one premises for the bank, removing the shop fronts and the internal walls on the ground floor. New steel framed windows were put in on both floors at this time. The upper decorative sections of the two central parapets were removed, and structural strengthening was added. The bank included office and public space, a lunchroom and stationery room. The concrete strong room and a lavatory block were constructed at this time. Ground floor windows on High Street were replaced in aluminium in 1979.

In 2019 Urban Function Architecture + Design designed a rooftop residential studio with terrace for addition to the building. This type of rooftop addition has been done elsewhere in High Street as part of post-earthquake repairs and alterations to heritage buildings and facades. Alterations made to the building at this time include new steel shop front windows on the ground floor to replace the 1970s aluminium joinery and the granite cladding. The original canopy remains – the struts having been reconditioned. The building interior was stripped out to enable strengthening works and accommodate the proposed use – the stairs and internal walls were removed. The profile of the bases of the first floor piers were slightly altered to accommodate structural strengthening.

The interior has been significantly altered, with heritage fabric removed over time. Interior heritage fabric is limited to the strong room and door with its locking mechanism, together with interior structural elements - floors, ceilings, beams, walls, columns and piers. This interior heritage fabric evidences the past use of the building as a bank, and also its construction and design.

TECHNOLOGICAL AND CRAFTSMANSHIP SIGNIFICANCE

Technological and craftsmanship values that demonstrate or are associated with: the nature and use of materials, finishes and/or technological or constructional methods which were innovative, or of notable quality for the period.

The building is of technological and craftsmanship significance for its construction methods, materials and finishes, which were of a good standard for the period. Construction is of reinforced concrete with a framing of steel beams and columns, concrete pad foundations, brick spandrel walls, and a concrete roof slab lined with iron. The use of concrete – reinforced and mass – was a significant feature of Alfred Luttrell's work. Harcourt granite was originally used for the facings at the main entrances; however, this was removed with the 2019/20 alterations.

The interior heritage fabric (the strong room and interior structural elements) evidences the quality and innovation of the construction and its materials.

CONTEXTUAL SIGNIFICANCE

Contextual values that demonstrate or are associated with: a relationship to the environment (constructed and natural), a landscape, setting, group, precinct or streetscape; a degree of consistency in terms of type, scale, form, materials, texture, colour, style and/or detail; recognised landmarks and landscape which are recognised and contribute to the unique identity of the environment.

The building and setting are of high contextual significance for their prominent central city location, the way the building design responds to the corner site, and for its relationship to a concentration of extant heritage buildings and facades along High Street. The adjacent Duncan's Buildings are also two storied with an entablature, parapet and suspended veranda, although in different materials and style. The floors and veranda of the two buildings are similarly aligned. The former High Street Post Office on the corner of the next block north was

designed and built in the 1930s and shares square headed steel windows, plain plastered exterior treatment, and restrained classical detailing with 129 High Street. The setting consists of the immediate land parcel, including the canopy over the footpath.

ARCHAEOLOGICAL AND SCIENTIFIC SIGNIFICANCE

Archaeological or scientific values that demonstrate or are associated with: the potential to provide information through physical or scientific evidence and understanding about social historical, cultural, spiritual, technological or other values of past events, activities, structures or people.

The building is of archaeological significance for its location on a site of pre-1900 human activity. It is on the traditional Ngāi Tahu route to the north, which later became a principal transport route for early European settlers. There is evidence of a building (or buildings) on the site in 1877 (Lambert Map) and businesses are recorded as operating from the site prior to the present building being constructed.

ASSESSMENT STATEMENT

The commercial building, setting and noted interior features at 129 High Street have overall heritage significance to Christchurch, including Banks Peninsula.

The commercial building has historical and social significance for its association with successful business woman and member of the Armstrong family (department store owners), Adelaide Fenerty, and its long use by the Bank of New Zealand from the 1920s to the early 1990s. It has cultural significance for its association with banking in Christchurch from 1928-1990s and for its development by a woman business owner during this period. 129 High Street is of architectural and aesthetic significance for its design in an Art Deco influenced classical style by the Luttrell Brothers. The building is of technological and craftsmanship significance for its construction methods, materials and finishes, which were of a good standard for the period. The building and setting are of high contextual significance for its prominent location, the way the building design responds to the corner site, and for its relationship to a concentration of surviving heritage buildings and facades along High Street. The building and setting are of archaeological significance for its location on an important Ngāi Tahu trail, a major early European transport route and as a site of pre-1900 human activity.

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REPORT DATED: 24 SEPTEMBER 2021

PLEASE NOTE THIS ASSESSMENT IS BASED ON INFORMATION AVAILABLE AT THE TIME OF WRITING. DUE TO THE ONGOING NATURE OF HERITAGE RESEARCH, FUTURE REASSESSMENT OF THIS HERITAGE ITEM MAY BE NECESSARY TO REFLECT ANY CHANGES IN KNOWLEDGE AND UNDERSTANDING OF ITS HERITAGE SIGNIFICANCE.

PLEASE USE IN CONJUNCTION WITH THE CHRISTCHURCH CITY COUNCIL HERITAGE FILES.

CHRISTCHURCH DISTRICT PLAN – SCHEDULED HERITAGE PLACE
HERITAGE ASSESSMENT – STATEMENT OF SIGNIFICANCE
HERITAGE ITEM NUMBER 1456
FORMER CASHMERE SANATORIUM OPEN AIR HUT AND
SETTING - 29 MAJOR AITKEN DRIVE, CHRISTCHURCH



Photo: Christchurch City Council, 2019

The Former Cashmere Sanatorium Open Air Hut and setting are of overall Significance to Christchurch and Banks Peninsula.

The Former Cashmere Sanatorium Open Air Hut and setting are of high historical and social significance for their association with the Cashmere Sanatorium, which was opened in 1910 to care for patients with pulmonary tuberculosis (TB). The disease had a significant impact on the Canterbury community, and approximately 10,000 patients were treated there between 1910 and 1960. The building is also associated with the medical professionals who worked and resided there, including the first doctor - Dr George Blackmore and medical officers, nurses and porters (orderlies).

In the late 19th century the disease was a major killer of in New Zealanders. Sanatoria were set up around the country from the turn of the century to provide specialist care. (Te Ara) The Cashmere Sanatorium was the first to be opened in the South Island. The disease peaked during WWII with 2603 cases recorded in 1943. Control measures were legislated in the Tuberculosis Act of 1948.

Although Nurse Sibylla Maude had initially established a tent based tuberculosis sanatorium in Wainoni in the early years of the twentieth century, the disease was deadly and prevalent enough to warrant the need for a permanent facility in Christchurch. There were 506 cases and 160 deaths noted in Canterbury in 1907 (Bennett). Large numbers of people caught the disease. Before the 1960s the main form of treatment was rest and exposure to sunlight and fresh air. The Cashmere Sanatorium was established with assistance from fundraising, and 12 acres of land donated for the

purpose by the Cracroft Wilson estate. The foundation stone for the main building was laid in 1907 by the Acting Prime Minister the Hon. W. Hall-Jones. The North Canterbury Hospital Board took over the 35 bed hospital before it opened in 1910. The sanatorium was initially managed by Dr. George Blackmore, who lived in a grand brick house situated on the hillside below the main building.

Coronation Hospital (for advanced cases of TB) opened on the same site in 1914 and a Military Sanatorium was built in 1918 to care from WWI returned servicemen with the disease. All of these institutions came to be known collectively as Coronation Hospital. The part of the complex where the huts were situated became known as the Middle Sanatorium. Upon its opening, there were 31 beds, with 27 of these located in the huts on the hillside. To the north and west of the main block, and to the east towards a gully, flat terraces were excavated for the huts. Over the years more terraces were formed, lower down the slopes, to site more huts. The huts were set side by side in rows along the terraces. A few special shelters could be rotated to catch the sun. By 1917 there were 85 beds in the shelters ('Up the Hill', Canterbury Area. Health Board). Governor-General Lord Bledisloe and Lady Bledisloe visited the Sanatorium in 1930, and Lord Bledisloe was reported as being very impressed with the huts. <https://www.stuff.co.nz/the-press/christchurch-life/124587082/1930-a-visit-to-the-sanatorium>

As medical care improved and cases of the disease reduced from the 1950s, along with recovery time from the disease, Coronation Hospital changed focus to care for the elderly over time. The last TB patient left the hospital in 1960 – fifty years after the hospital opened to patients. The shelters stood empty at this time, and most were relocated off site. The elderly persons facilities were closed in 1991 and the remaining sanatorium buildings were demolished in 1993 to make way for a new housing development (Broad Oaks). At this time Fulton Hogan donated the last remaining hut to the City Council, which was relocated to Council reserve land in Coronation Reserve in the late 1990s. Street and place names in the area reflect the past history of the site (eg Coronation Reserve, Major Aitken Drive).

The Former Cashmere Sanatorium Open Air Hut and setting are of high cultural significance as they reflect the way of life of patients at the sanatorium – isolated, with only the basic needs met. The site of the former sanatorium complex reflects the provision of care for members of society who are unwell, and the needs of particular groups such as returned servicemen and children. The sanatorium complex was largely avoided by the general public, to the extent that people were unwilling to build houses nearby, or send their children to play with the doctor's children, for fear of catching the disease. (Christchurch City Libraries). Although the sanatorium was seen by the general public as a place of death and despair, Dr. Blackmore was adamant that the sanatorium would be 'an atmosphere of cheerfulness and hope'. Despite his stern and reserved demeanour, he cared strongly for his patients, and was an advocate for their right to return to society as contributing members, not outcasts. At a time when there was no proven cure for tuberculosis, hope was all the patients had. Former patients struggled to reintegrate into society and employment due to the stigma of beliefs around the disease at the time. The longest resident patient stayed for 21 years. The last patient to recover was discharged in 1960. Following this, the open air shelters where the patients had lived were removed and many found a new purpose as garden sheds or sleep outs in the backyards of Christchurch. (Christchurch City Libraries). Various charitable bodies were set up to support the more personal needs of patients and their families.

The Former Cashmere Sanatorium Open Air Hut and setting are of architectural and aesthetic significance for the design of the hut (possibly by architect Samuel Hurst Seager) which reflects medical treatments of the period and it is the last remaining hut on the original Sanatorium site.

The Isolation Unit building or hut is approximately 9 metres squared with three sliding glazed doors which enabled the structure to be open on three sides to provide the fresh air considered necessary at the time for treatment of tuberculosis. The hut is of weatherboard construction with a corrugated iron roof. The windows have been replaced with perspex. The hut is lined in timber board and batten. The isolation units were oriented towards the sun and away from cold easterly and southerly winds. The original scheme sketch for the complex was designed by well-known Christchurch architect Samuel Hurst Segar. Terraces and retaining walls were built enabling the units to be constructed on timber skids for flexibility of siting. The single units had a single standard hospital metal bed, a bedside locker, wardrobe, chair, and a privacy curtain on rails. The units were supplied with overhead electricity for lighting and heating. Ablutions were performed in separate buildings. Fences divided male and female areas of the facility. The units were a mix of one and two bed capacity. Windows are six paned and top hung, cladding is vertical timber tongue and groove, doors are nine pane sliding doors. Windows originally had a mix of clear and obscure glazing.

The whole interior contributes to the significance of the heritage item because of its form and materials, and the extent of heritage fabric that remains throughout. Interior features include the layout and space, structure and linings, fixtures, hardware, materials and finishes.

The Former Cashmere Sanatorium Open Air Hut and setting are of technological and craftsmanship significance for the construction materials and methods of the hut. The huts were a specific rather than standard design in terms of the particular requirements for patients. This included the windows, ability to be relocated easily, and in terms of the sliding door mechanisms.

The Former Cashmere Sanatorium Open Air Hut and setting are of high contextual significance for their location in the Coronation reserve. The hut is located near its original site. The setting is located within Coronation Reserve, which contains mature trees and plantings. The broader residential area still contains evidence of the former Sanatorium complex in landscaping features in the form of concrete terraces. These would have housed other huts like it originally. Dr Blackmore took an interest in tree planting and encouraged a wide variety of specimen and plantation trees on the site. The location of the sanatorium provided a remote rural setting, which responded to how contagious the disease was, as well as providing the fresh air and sunshine considered necessary for patients' recovery.

The Former Cashmere Sanatorium Open Air Hut and setting are of archaeological significance for their potential to provide evidence of human activity, particularly that related to provision of healthcare from 1910.

References – CCC Heritage Files; HNZPT Nomination form, Cashmere Sanatorium Open Air Hut (former); Canterbury Maps Historical website; Te Ara 'Spas, Sanatoriums and surgery' [Spas, sanatoriums and surgery – Te Ara Encyclopedia of New Zealand](#); Cashmere Sanatorium (Now Coronation Hospital) 1906-1964, F.O. Bennett; The Hill of Hope – Cashmere Sanatorium <https://my.christchurchcitylibraries.com/blogs/post/the-hill-of-hope-cashmere-sanatorium/> ; Up the Hill. Cashmere Sanatorium and Coronation Hospital 1910-1991, Canterbury Area Health Board, 1993.

REPORT DATED: JUNE 2022

PLEASE NOTE THIS ASSESSMENT IS BASED ON INFORMATION AVAILABLE AT THE TIME OF WRITING. DUE TO THE ONGOING NATURE OF HERITAGE RESEARCH, FUTURE REASSESSMENT OF THIS HERITAGE ITEM MAY BE NECESSARY TO REFLECT ANY CHANGES IN KNOWLEDGE AND UNDERSTANDING OF ITS HERITAGE SIGNIFICANCE.

PLEASE USE IN CONJUNCTION WITH THE CHRISTCHURCH CITY COUNCIL HERITAGE FILES.

**CHRISTCHURCH DISTRICT PLAN –SCHEDULED HERITAGE PLACE
HERITAGE ASSESSMENT – STATEMENT OF SIGNIFICANCE
HERITAGE ITEM NUMBER 1402
*COMMERCIAL BUILDING AND SETTING, FORMER
CANTERBURY TERMINATING BUILDING SOCIETY –
159 MANCHESTER STREET, CHRISTCHURCH***



PHOTOGRAPH: A Ohs, 22.10.2020

HISTORICAL AND SOCIAL SIGNIFICANCE

Historical and social values that demonstrate or are associated with: a particular person, group, organisation, institution, event, phase or activity; the continuity and/or change of a phase or activity; social, historical, traditional, economic, political or other patterns.

The former Canterbury Terminating Building Society (CTBS) building has historical and social significance for its association with the development of the regional economy and its financial infrastructure in the mid-20th century. The building dates from 1957- 60 and was the first large-scale office building to be erected in the city following World War II. It marked the beginning of an important phase of central city office building, which took place during the 1960s and 1970s and gave rise to a number of notable structures, including Peter Beaven's Manchester Unity building (1967), Paul Pascoe's Peryer's building and Warren and Mahoney's SIMU building (1966), which are now all demolished.

The former CTBS building also represents an important period in the evolution of financial institutions in New Zealand. The post-war emergence of the building society, as a major source of mortgage finance, coincided with the transition from state provision of housing, through loans as well as state houses, to private providers during the later 1950s and the 1960s. The success of the Canterbury Terminating Building Society (later the United Building Society) is demonstrated by the construction of two further buildings for the society, both designed by Peter Beaven, in 1972 and 1989. The three buildings occupied almost the entire triangular CBD block delimited by Manchester, Cashel and High Streets; of this triumvirate the earliest is the sole survivor.

By 1972 the building was no longer occupied by the Canterbury Terminating Building Society. Tenants at this time included Beaven Hunt Associates (architects), Swift Consolidated and a stereo shop on the ground floor. In 1974 Mutual Life Citizens Assurance moved into part of the building. In 1977 other tenants included National Provident Fund, Drake Personnel and Dillon's The Kowhai Florists. Mak's Camera Centre were tenants in 1982. The main tenant of the building in the 1980s was the Department of Internal Affairs, which undertook refurbishments in 1987. In 1986 ownership transferred to Brittco Management. In 1999 the building was owned by Swift Holdings; Te Wananga o Aotearoa were tenants in 2008.

The building was proposed for scheduling as part of the District Plan Review in 2015, however this did not proceed. Despite a successful application for building consent to demolish the building in December 2015 the building was sold in c2018.

In October 2017 Council approved a Central City Landmark Grant to new owners Box 112 / PL Manchester Limited for full repair and seismic upgrade of the building. The building reopened in June 2020 as a boutique hotel operated by Sarin Group, a New Zealand based family hotel company which owns and manages hotels for brands including Accor, Hilton and Intercontinental. The name of the hotel is the Muse Christchurch Art Hotel. The penthouse was converted for use as a rooftop bar.

CULTURAL AND SPIRITUAL SIGNIFICANCE

Cultural and spiritual values that demonstrate or are associated with the distinctive characteristics of a way of life, philosophy, tradition, religion, or other belief, including: the symbolic or commemorative value of the place; significance to Tangata Whenua; and/or associations with an identifiable group and esteemed by this group for its cultural values.

The former Canterbury Terminating Building Society building has cultural significance as a physical manifestation of an important type of financial institution that provided mortgage finance to its contributing members, allowing them to realise the 'Kiwi dream' of ownership of a stand-alone dwelling on a separate plot of suburban land.

ARCHITECTURAL AND AESTHETIC SIGNIFICANCE

Architectural and aesthetic values that demonstrate or are associated with design values, form, scale, colour, texture and material of the place.

The former Canterbury Terminating Building Society building has high architectural significance as a rare surviving example of post-war commercial construction that was a product of the nationally significant 'Christchurch School' of mid-century modern architecture. It was designed by noted Christchurch architects B.J. Ager and Peter Beaven. The design of the building was commenced by Ager, who was unable to continue on account of ill health. Born in Ashburton, Benjamin Ager (1875-1959) was the son of an architect and worked for Peter Graham as a carpenter in Christchurch before going to London for several years. After returning to New Zealand he went into private practice in 1912. Ager had a long career and his oeuvre included St Elmo Courts on the corner of Montreal and Hereford Streets (1929, demolished) and the 1928 Road Service Bus Station in Victoria Street, which was demolished to make way for the Christchurch Casino.

The plans lodged with the Council for consent at the time of construction, which are held in the heritage architectural plan collection, include both architects' names who are noted as 'Architects in Association'. Peter Beaven (1925-2012) was, along with Sir Miles Warren, one

of Christchurch's most significant architects of the second half of the 20th century. He was the designer of some of the city's most important buildings including the Manchester Unity building (now demolished) and the Lyttelton Tunnel Administration Building (also demolished). The architect had his office in the penthouse of the CTBS building for a time after the building's construction.

Additions to the penthouse were granted in March 1972, designed by Beaven, Hunt and Associates. In 1987 partition and refurbishment of the 2nd, 3rd and 4th floors was carried out by the Department of Internal Affairs, to the design of the Ministry of Works and Development.

The exterior of the building is largely original. The east, north and south elevations of the former CTBS building conform to the conventional grid composition of the International Style of commercial design and largely follow Ager's 1957 elevation drawings. In contrast, the building's west elevation and, in particular, the penthouse level, anticipate the sculptural freedom of composition that was to become a hallmark of Beaven's later buildings. The glazed stair tower on the west elevation and the cantilevered roofs of the two-storey penthouse level are indicative of this. The quality of the building programme can be seen in the treatment of the façade, wherein fluted bronze panels define each floor level. Together these elements reflect Beaven's predilection for expressing the internal spatial organisation of his buildings on their exteriors and transcend the routine uniformity of much contemporary commercial design.

Internally the original lift and the central stair case, complete with the original glass light fittings in the stair well, landings, and balustrade, all remained in situ prior to the 2020 hotel conversion. Some of the original safes, complete with doors, were extant and the original radiator heating system was still in use. For the remaining areas of the building modern office fit-outs had been installed with partition walls, although a number of original doors remained in the load bearing walls.

Works undertaken in 2019-2020 by Three Sixty Architecture included asbestos removal; wrapping of columns with fibre reinforcements; removal of all existing plate glass; installation of sound proof laminated glazing throughout, addition of a waterproof coating to the roof top; conversion of the rooftop to a bar; refurbishment of the original lift and installation of a new motor, new ground floor glazing, shop fronts and doors; removal of brickwork on the west boundary wall and its replacement with lightweight infill walls; new concrete foundations; crack repair in concrete walls and beams; installation of new columns within the building envelope; new hotel office, lobby, reception and rooms (40) and the decommissioning and removal of the original heating system of large perimeter radiators.

The hotel fit out featured an artistic theme with each of the five hotel floors assigned to a local Christchurch artist to decorate. The artists involved were: Josh O'Rourke, Clint Parks, Kyla K, Jacob Root and Lara Marshall.

The interior has been significantly altered, with heritage fabric removed over time. Interior heritage fabric is now limited to the lift; staircase, stair balustrade and staircase light fittings; and structural elements – floor plates, ceilings, beams, walls, columns and piers. The remaining heritage fabric is of significance because it evidences the original structural design, era of design, and aesthetics of the fit out of the building which are associated with architects B J Ager and Peter Beaven.

TECHNOLOGICAL AND CRAFTSMANSHIP SIGNIFICANCE

Technological and craftsmanship values that demonstrate or are associated with: the nature and use of materials, finishes and/or technological or constructional methods which were innovative, or of notable quality for the period.

The former Canterbury Terminating Building Society building has technological and craftsmanship significance for its association with leading Christchurch engineer, Guy Powell, and as an example of late-1950s reinforced concrete frame construction applied to a multi-storey office building. Steel framing was used in the construction of the penthouse with generous areas of glazing for both the penthouse and office floors below. The building is a

notable survivor of a type of building once common in the city, but largely lost as a result of the Christchurch earthquakes. The fact that it survived the Canterbury earthquakes in essentially undamaged condition demonstrates its structural resilience and the quality of the initial engineering design with its robust grid of concrete columns and beams. The use of materials such as bronze for its architectural detailing also contribute to the building's technological and craftsmanship significance.

The building was seismically strengthened in 2019 which added contemporary structural materials and methods as a layer to the original fabric.

The interior heritage fabric evidences the quality and innovation of the construction and its materials.

CONTEXTUAL SIGNIFICANCE

Contextual values that demonstrate or are associated with: a relationship to the environment (constructed and natural) setting, a group, precinct or streetscape; a degree of consistency in terms of scale, form, materials, texture, colour, style and/or detailing in relationship to the environment (constructed and natural), setting, a group, precinct or streetscape; a physical or visible landmark; a contribution to the character of the environment (constructed and natural) setting, a group, precinct or streetscape.

The former Canterbury Terminating Building Society building has contextual significance for its size, scale, design and quality and as a central business district landmark, prominently located on the south end of Manchester Street, on the corner High Street.

The original context of the building has been dramatically changed – it was historically part of an important grouping of Peter Beavan designed buildings, and was aligned with Bedford Row (removed). The picturesque quality of the upper levels, viewed from the north and west, adds a sculptural quality to the city skyline.

The setting consists of the immediate land parcel, including the canopy over the footpath.

ARCHAEOLOGICAL SIGNIFICANCE

Archaeological values that demonstrate or are associated with: potential to provide archaeological information through physical evidence; an understanding about social historical, cultural, spiritual, technological or other values or past events, activities, people or phases.

The former Canterbury Terminating Building Society building and setting have archaeological value because they have the potential to provide archaeological evidence relating to human activity on the site, including that which occurred prior to 1900. The site is located on the main north-south access route used by Ngāi Tahu for mahinga kai (food gathering). TS Lambert's map of the inner city shows that there were buildings on this site by 1877.

ASSESSMENT STATEMENT

The former Canterbury Terminating Building Society building, its setting and noted interior fabric have overall high heritage significance to Christchurch, including Banks Peninsula.

This commercial building has historical and social significance for its association with the Canterbury Building Society and the development of the region's financial infrastructure and cultural significance as evidence of the increasing role building societies played in home financing in the mid-20th century. The former CTBS building has high architectural significance as a rare surviving commercial work by one of Canterbury's most important 20th century architects, Peter Beaven, in association with B.J. Ager. The former CTBS building has technological and craftsmanship significance for its resilient reinforced concrete frame construction and use of materials such as bronze for its architectural detailing. The former CTBS building and its setting have contextual significance as a central city landmark which has become more prominent since the 2011 Canterbury earthquake. The former CTBS

building and its setting have archaeological value in view of their location on the main North-South access route used by Ngāi Tahu for mahinga kai (food gathering). The site is also located in a part of the city that has been built up since the 19th century.

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The Muse Christchurch Art Hotel <https://themusehotel.co.nz/>

REPORT DATED: 30 OCTOBER 2021

PLEASE NOTE THIS ASSESSMENT IS BASED ON INFORMATION AVAILABLE AT THE TIME OF WRITING. DUE TO THE ONGOING NATURE OF HERITAGE RESEARCH, FUTURE REASSESSMENT OF THIS HERITAGE ITEM MAY BE NECESSARY TO REFLECT ANY CHANGES IN KNOWLEDGE AND UNDERSTANDING OF ITS HERITAGE SIGNIFICANCE.

PLEASE USE IN CONJUNCTION WITH THE CHRISTCHURCH CITY COUNCIL HERITAGE FILES.

**CHRISTCHURCH DISTRICT PLAN – SCHEDULED HERITAGE PLACE
HERITAGE ASSESSMENT – STATEMENT OF SIGNIFICANCE
NEW BRIGHTON BEACHFRONT - 195, 213, & 213R MARINE
PARADE & MARINE PARADE & BRIGHTON MALL ROAD RESERVE,
CHRISTCHURCH**

The New Brighton Clock Tower, War Memorial and Amphitheatre are heritage features of the historically evolved beachfront area of New Brighton. The settlement of New Brighton began in the 1860s and by the early 1870s it was recognised as a visitor destination. The 1887 opening of a tram route from Cathedral Square to New Brighton encouraged residential development and facilitated visitor access in the area. As a result the beach frontage became built up with shops and hotels. Over time, a pier and rock seawalls were added, along with changing and playground facilities which included a whale paddling pool. The current pier and library building was constructed in 1997. A new playground and replica whale pool were erected in two stages in 2017 and 2018 and Te Puna Taimoana a hot pools complex opened in 2020.

**CHRISTCHURCH DISTRICT PLAN –SCHEDULED HERITAGE PLACE
HERITAGE ASSESSMENT – STATEMENT OF SIGNIFICANCE
HERITAGE ITEM NUMBER 602
*NEW BRIGHTON CLOCK TOWER AND SETTING – 195, 213, &
213R MARINE PARADE & MARINE PARADE & BRIGHTON
MALL ROAD RESERVE, CHRISTCHURCH***



PHOTOGRAPH: M VAIR-PIOVA, 2015

HISTORICAL AND SOCIAL SIGNIFICANCE

Historical and social values that demonstrate or are associated with: a particular person, group, organisation, institution, event, phase or activity; the continuity and/or change of a phase or activity; social, historical, traditional, economic, political or other patterns.

The New Brighton Clock Tower has historical and social significance for its association with the Green family and as an instance of civic philanthropy. The settlement of New Brighton began in the 1860s and by the early 1870s it was recognised as a visitor destination. The 1887 opening of a tram route from Cathedral Square to New Brighton encouraged residential development and facilitated visitor access in the area. As a result the foreshore became built up with shops and hotels. The New Brighton Clock Tower was donated by Richard Green in 1934 in memory of his father Edmund Green. Green senior was an early settler who arrived in 1859 with his family after gaining free passage to New Zealand from England in order to

establish the first electric telegraph system. He was sponsored by J E Fitzgerald, the Canterbury Emigration Agent and first Superintendent of the Canterbury Provincial Council.

Richard Green, a retired builder (1853-1938), also donated funds for the Scarborough Clock Tower and the Fitzgerald Statue on Rolleston Avenue in 1934. The foundation stone for the New Brighton clock was laid by the Mayoress of New Brighton, Miss I A M Leaver, in December 1934 and the tower was officially opened in September 1935 with a large crowd in attendance. In the 1980s the open tower base was closed in due to vandalism. In 1996 the interior and exterior underwent alterations, and the base of the tower was adapted for use as an information centre. These changes were reversed in 2000 during restoration of the tower by Christchurch City Council. The tower sustained minor damage in the 2010/2011 Canterbury earthquakes. Corrosion of the reinforcing bars and some spalling of the concrete is unrelated to the earthquakes and arises from the age of the structure.

CULTURAL AND SPIRITUAL SIGNIFICANCE

Cultural and spiritual values that demonstrate or are associated with the distinctive characteristics of a way of life, philosophy, tradition, religion, or other belief, including: the symbolic or commemorative value of the place; significance to Tangata Whenua; and/or associations with an identifiable group and esteemed by this group for its cultural values.

The New Brighton Clock Tower has cultural significance as an example of the civic philanthropy that has endowed the city with a large numbers of buildings, monuments, and public artworks over many years. It commemorates the contribution Edmund Green made to the city and reflects the way of life of the Depression-era unemployment relief workers who worked on this construction project.

ARCHITECTURAL AND AESTHETIC SIGNIFICANCE

Architectural and aesthetic values that demonstrate or are associated with: a particular style, period or designer, design values, form, scale, colour, texture and material of the place.

The New Brighton Clock Tower has architectural and aesthetic significance for its design by local architect and structural engineer B J Ager. Born in Ashburton, Benjamin Ager (1875-1959) was the son of an architect and worked for Peter Graham as a carpenter in Christchurch before going to London for several years. After returning to New Zealand he went into private practice in 1912. Ager had a long career and his oeuvre includes St Elmo Courts on the corner of Montreal and Hereford Streets (1929, demolished) and the 1928 Road Service Bus Station in Victoria Street, which was demolished to make way for the Christchurch Casino. Ager's original design for the clock tower, published in November 1934, was for a masonry tower built from random rubble stone.

The Clock Tower is in a Stripped Classical style, approximately three storeys in height with a rectangular footprint. Fluted corner piers frame the base of the tower, into which is set an arched entrance decorated with a barley-twist motif. The same motif is repeated over at the corner of the piers and at the parapet level beneath the dome. The donor himself expressed his thoughts on the clock tower's aesthetic and architectural qualities by stating '...in deciding upon a clock tower as a useful gift, I was actuated by the motive of combining beauty, permanence and utility'. A clock face is set within each elevation and from its inception it was intended the tower would be lit at night.

TECHNOLOGICAL AND CRAFTSMANSHIP SIGNIFICANCE

Technological and craftsmanship values that demonstrate or are associated with: the nature and use of materials, finishes and/or technological or constructional methods which were innovative, or of notable quality for the period.

The clock tower has technological and craftsmanship significance for its robust reinforced concrete construction and the quality of its cast decorative embellishments. The successful tenderer for the project was the Conlyn Importing and Construction Company. A 1935 report in the *Press* noted that the clock was of the best quality obtainable and was imported from England.

CONTEXTUAL SIGNIFICANCE

Contextual values that demonstrate or are associated with: a relationship to the environment (constructed and natural), a landscape, setting, group, precinct or streetscape; a degree of consistency in terms of type, scale, form, materials, texture, colour, style and/or detail; recognised landmarks and landscape which are recognised and contribute to the unique identity of the environment.

The New Brighton Clock Tower and its setting have contextual significance for its prominent axial position on Marine Parade, in between New Brighton Mall and the New Brighton Library and Pier. It is a landmark structure by virtue of its location, height and function and makes an important contribution to the streetscape of Marine Parade. It is also part of a group of commemorative structures gifted to the city by Richard Green, along with the Scarborough Clock Tower and Fitzgerald Statue. The setting consists of the area of road reserve on which the tower stands including the viewshaft from Brighton Mall and the beach frontage on either side which includes the playground to the north and the amphitheatre and war memorial to the south. Prior to the construction of the new New Brighton Library in 1999 the clock tower had greater visual impact on the eastern/seaward side.

ARCHAEOLOGICAL AND SCIENTIFIC SIGNIFICANCE

Archaeological or scientific values that demonstrate or are associated with: the potential to provide information through physical or scientific evidence an understanding about social historical, cultural, spiritual, technological or other values of past events, activities, structures or people.

The New Brighton Clock Tower and its setting is of archaeological significance because it has the potential to provide archaeological evidence relating to human activity on the site, possibly including that which occurred before 1900.

ASSESSMENT STATEMENT

The New Brighton Clock Tower and its setting has overall significance to Christchurch, including Banks Peninsula. The Clock Tower has historical and social significance as a memorial gift in recognition of Edmund Green by his son Richard. The structure has cultural significance as an instance of civic philanthropy and for its association with the way of life of relief workers during the Depression. The New Brighton Clock Tower has architectural and aesthetic significance for its Stripped Classical design by architect B J Ager. The clock tower has technological and craftsmanship significance for its robust reinforced concrete construction and the quality of its cast decorative embellishments. It has contextual significance as a prominent landmark on Marine Parade and in relation to the New Brighton

Mall, New Brighton Library and the New Brighton Pier. The New Brighton Clock Tower and its setting is of archaeological significance because it has the potential to provide archaeological evidence relating to human activity on the site, possibly including that which occurred before 1900.

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REPORT DATED: 26 FEBRUARY 2015

PLEASE NOTE THIS ASSESSMENT IS BASED ON INFORMATION AVAILABLE AT THE TIME OF WRITING. DUE TO THE ONGOING NATURE OF HERITAGE RESEARCH, FUTURE REASSESSMENT OF THIS HERITAGE ITEM MAY BE NECESSARY TO REFLECT ANY CHANGES IN KNOWLEDGE AND UNDERSTANDING OF ITS HERITAGE SIGNIFICANCE.

PLEASE USE IN CONJUNCTION WITH THE CHRISTCHURCH CITY COUNCIL HERITAGE FILES.

**CHRISTCHURCH DISTRICT PLAN – SCHEDULED HERITAGE PLACE
HERITAGE ASSESSMENT – STATEMENT OF SIGNIFICANCE
HERITAGE ITEM NUMBER 1438
*NEW BRIGHTON WAR MEMORIAL, AMPHITHEATRE, AND
SETTING - 195, 213, & 213R MARINE PARADE & MARINE
PARADE & BRIGHTON MALL ROAD RESERVE,
CHRISTCHURCH***



PHOTOGRAPH: G. WRIGHT, 1/10/2021

HISTORICAL AND SOCIAL SIGNIFICANCE

Historical and social values that demonstrate or are associated with: a particular person, group, organisation, institution, event, phase or activity; the continuity and/or change of a phase or activity; social, historical, traditional, economic, political or other patterns.

The New Brighton War Memorial, amphitheatre, and setting have high historical and social significance as a monument to the significant impact of the World Wars on the community of New Brighton. The memorial is part of a network of memorials in New Zealand communities constructed in the years after World War One.

An attempt by the New Brighton Borough Council to erect a memorial for New Brighton soldiers was made in 1919, however this effort stalled as it met resistance from locals who objected to the cost

being drawn from rates. In late 1924 efforts to build a monument were revived, with the borough council deciding at a meeting on November 4 that a non-utilitarian memorial should be constructed using funds raised voluntarily from the public after an appeal by circular. Despite some public disagreement, it was decided that individual names of the fallen should not be recorded on the monument, for fear of accidentally leaving some off.

A cenotaph design submitted by Christchurch stonemason John Tait was accepted and, on ANZAC Day 1925, the foundation stone of the monument was laid by Colonel Robert Young at the top of the 'stadium' amphitheatre on the New Brighton foreshore. On November 1st 1925, with a large crowd of public and dignitaries in attendance, the monument was officially unveiled by Governor General Sir Charles Fergusson, who gave a speech celebrating the sacrifices of New Brighton soldiers and their families, as well as victory in the war.

The later inclusion of the start and end dates of the Second World War show the additional purpose of the monument as a focus for remembrance of the New Brighton war dead in this later war.

The concrete stadium (amphitheatre) of tiered seating curved around an outdoor space had been constructed in 1923 as a site for community entertainment and performances. The New Brighton beachfront area has historically been a visitor attraction for Christchurch residents, and continues to be in 2021, with a new playground and hot pool complex. The amphitheatre originally faced a band rotunda, which was removed in 1956 and subsequently replaced by a sound shell stage in 1960, although neither survives. With the construction of the monument immediately to the south of the amphitheatre, the stepped seating has since been associated with the War Memorial.

The memorial has become a fixture of the New Brighton beachfront, and continues to be used in annual ANZAC Day commemoration services. Restoration work on the monument, including the replacement of some eroded stone segments, took place in 2003. 2003 also saw the construction of a set of more easily traversable steps in the centre of the amphitheatre, and a concrete block wall around sections of the flat area surrounding the monument.

CULTURAL AND SPIRITUAL SIGNIFICANCE

Cultural and spiritual values that demonstrate or are associated with the distinctive characteristics of a way of life, philosophy, tradition, religion, or other belief, including: the symbolic or commemorative value of the place; significance to Tangata Whenua; and/or associations with an identifiable group and esteemed by this group for its cultural values.

The New Brighton War Memorial, amphitheatre, and setting have high cultural and spiritual significance as a focus for the commemoration of New Brighton's war dead in both World Wars. Annual ANZAC Day commemorations at the site indicate enduring community esteem for the monument.

Although World War One resulted in victory for the Allied powers, the incredible cost in lives and suffering led to an emphasis being placed on the commemoration of sacrifice for the greater societal good. The inclusion on the monument of the names of locations in which New Brighton soldiers fought (France, Egypt, Mesopotamia, Flanders, Palestine, and Gallipoli) serves to emphasise the great distance travelled by soldiers in order to fight, and highlights the imperial nature of their service to the British Empire in such faraway locations. The Latin inscription 'PRO PATRIA', meaning 'For Country', represents the value of loyalty to nation and empire. The sculpted tomb at the top of the monument is surrounded by carved *fascies*, representing the strength to be found in unity and law.

The monument in its symbolism also reflects the Christian beliefs around death and remembrance which prevailed at the time of its construction, emphasised by the presence of the prominent Christian cross on the front face of the monument, and other traditional symbols used in service of such beliefs. A carved wreath near the base of the monument represents eternal life and the victory of the soul over death. The top of the monument takes the form of a sculpted tomb, representing the empty tombs of the absent dead. As most soldiers who were killed either had no known grave or were buried in cemeteries in the Middle East or near the Western Front of Europe, the monument could serve as a surrogate tomb at which local bereaved could mourn and mark the passing of their loved ones.

The amphitheatre was a place of activity, gathering and entertainment for the local New Brighton and Christchurch community. New Brighton beach and has community associations for the city's residents as a visitor destination historically and through to the present day. With the construction of the monument in 1925, the amphitheatre gained additional cultural importance as the location for the tradition of annual ANZAC services.

ARCHITECTURAL AND AESTHETIC SIGNIFICANCE

Architectural and aesthetic values that demonstrate or are associated with: a particular style, period or designer, design values, form, scale, colour, texture and material of the place.

The New Brighton War Memorial, amphitheatre, and setting have architectural and aesthetic significance due to the monument's cenotaph form, materials, and decorative detailing, the design of the concrete amphitheatre, and the visual and physical relationship between the monument and the amphitheatre.

The monument takes the form of a cenotaph, with a design strongly influenced by Edwin Lutyen's well-known World War One memorial cenotaph in Whitehall, London (1920). Originally Lutyen's cenotaph was a temporary structure but it was rebuilt in a permanent fashion after a positive public reception. The design for the New Brighton monument was submitted by a well-known Christchurch stonemason, John Anderson Tait.

John Anderson Tait took over management of his father's stone masonry business in 1895, working with his son John Edward Tait. The business continues today in the Tait family and operates from Sydenham. John Anderson Tait's father James Tait (1833-98) was a Scotsman who came to New Zealand in the 1860s and established a business as a builder, contractor and monumental mason in Christchurch in c1863. Tait worked on several prominent Christchurch buildings including the Museum and part of Christ Church Cathedral.

The monument is constructed primarily of sandstone, with a granite foundation stone, set on a base of three concrete steps. The monument rises from its base in a tapering rectangular cenotaph column. A granite plaque is set at the base of the column, inscribed with the dedication: "To Our Honoured Dead – Erected by the Residents of New Brighton". Above this is a finely carved wreath. Higher on the north face is a Christian cross in relief. On either side of the cross are carved the beginning and end dates of World War One and World War Two. The inscription 'PRO PATRIA' is carved near the top of the monument. At the top of the monument is a sculpted tomb, decorated with carved bunting. Around the base of the tomb on all sides of the monument are carved images of bundled and tied wooden rods representing *fascies*.

The original stones used in the monument are of a reddish-orange hue. This was white Australian sandstone with granite foundation stone (The Star, 21 March 1925, p.25). An analysis performed in 2003 on samples taken from the monument revealed that this reddish colour did not extend far beyond the surface, and that the majority of the stone was a greyish colour, indicating that the surface of the stone has changed over time. The stone used to replace many eroded blocks in the 2003 renovation works is of a lighter greyish-white colour, which contrasts with the colour of the original stones.

In recent years the monument has been a target for graffiti. As a measure to prevent further defacement, and damage from removing graffiti paint, a plexiglass surround was erected around the monument in 2017.

The amphitheatre serves to visually emphasize the monument situated at its apex, and to raise the monument in elevation above the surrounding area. With the construction of the new pier complex in 1997, the amphitheatre was joined to the southern end of the ramp leading to the New Brighton pier and library building. Alterations were made to the stadium step seating in 2003, including the addition of railings and a central set of more easily traversable steps with banisters and railings. Sections of concrete block wall with attached seating were also erected around the flat area on which the monument is placed, which serve to clearly delineate the monument's setting from the nearby carpark.

TECHNOLOGICAL AND CRAFTSMANSHIP SIGNIFICANCE

Technological and craftsmanship values that demonstrate or are associated with: the nature and use of materials, finishes and/or technological or constructional methods which were innovative, or of notable quality for the period.

The New Brighton War Memorial, amphitheatre, and setting have technological and craftsmanship significance for the materials of their construction and restoration, and for demonstrating the skills of highly regarded stonemason John Anderson Tait in 1925, and also later stonemason skills in 2003. The decorative stonework and lettering are finely detailed and of a high standard.

The white Australia sandstone seriously eroded in recent times. This included the wearing down of surfaces, pitting, exfoliation, and the loss of stone and detail from decorative elements. A chemical analysis of stone samples showed that a large degree of chlorination was present in the stone from the east side facing the salt-laced sea winds. In 2003, restoration work was undertaken to improve the condition of the monument. Some of the most eroded sections of original stone were removed and placed into storage. This included much of the section in the central portion of the monument as well as the wreath, which was replaced by one newly carved. The top sections of the monument were also replaced, including the tomb and the stone beneath it with the words "PRO PATRIA." The stone used in the restoration was a consolidated sandstone from Sydney. The newer, greyish-white stone is easily distinguished from the older stone, as it lacks the reddish-orange surface colour.

The amphitheatre seating is made from poured concrete, as are the newer central steps leading up to the monument. The balustrade of the central steps are also concrete, with the addition of metal railings. The sections of wall surrounding the memorial are constructed of concrete blocks.

CONTEXTUAL SIGNIFICANCE

Contextual values that demonstrate or are associated with: a relationship to the environment (constructed and natural), a landscape, setting, group, precinct or streetscape; a degree of consistency in terms of type, scale, form, materials, texture, colour, style and/or detail; recognised landmarks and landscape which are recognised and contribute to the unique identity of the environment.

The New Brighton War Memorial, amphitheatre, and setting have high contextual significance for their prominent position in an area of local community activity and landscaping on the New Brighton beachfront. The monument is a prominent visual landmark. The location and setting provide open views to the monument against the sky and also to the southern hills of Godley Head and Banks Peninsula.

The 1997 introduction of the pier and library building, and the removal of the sound shell altered the context of the monument's location – it is no longer the centrepiece of a place of dedicated public seaside entertainment, but an element of the historically evolved public beachfront area. The setting of the war memorial and amphitheatre includes the area of land behind the monument with its surrounding wall and the broader pier setting which includes the New Brighton Clock Tower, a scheduled heritage feature unveiled in 1935.

The memorial has contextual significance in relation to other war memorials in Christchurch suburbs as well as New Zealand, as many monuments were built in the aftermath of the war to commemorate victims. It has particular significance in relation to other cenotaph monuments inspired by Lutyen's Whitehall cenotaph, such as the Auckland War Memorial (unveiled in 1929).

ARCHAEOLOGICAL AND SCIENTIFIC SIGNIFICANCE

Archaeological or scientific values that demonstrate or are associated with: the potential to provide information through physical or scientific evidence an understanding about social historical, cultural, spiritual, technological or other values of past events, activities, structures or people.

The New Brighton War Memorial, amphitheatre, and setting are of archaeological significance as the site has potential to provide archaeological evidence relating to past human activity prior to 1900. The monument is close to Te Karoro Karoro (South Brighton Spit), which was part of the traditional travel route for local Māori between Kaiapoi pā and Horomaka/Te Pātaka-a-Rākaihautū (Banks Peninsula). There was early settler activity in the New Brighton area, with the first European dwelling built in the 1860s, a seaside resort established in the 1870s, and a tramline completed in 1887.

ASSESSMENT STATEMENT

The New Brighton War Memorial, amphitheatre, and setting are of high overall significance to the Christchurch district, including Banks Peninsula.

The New Brighton War Memorial, amphitheatre, and setting are of high historical and social significance as a monument built in the aftermath of World War One to commemorate the war dead of New Brighton, and for the memorial's continued use as a focus of annual ANZAC Day commemorations to the present day. The New Brighton War Memorial, amphitheatre, and setting are of high cultural and spiritual significance as an expression of cultural values of sacrifice and loyalty to nation, religious beliefs surrounding death and remembrance, and for its value to the community of New Brighton as a focus for the mourning of local soldiers killed in the world wars. The New Brighton War Memorial, amphitheatre, and setting have architectural and aesthetic significance for their design, form, detailing, and visual and physical relationship. The New Brighton War Memorial, amphitheatre, and setting are of technological and craftsmanship significance for the stone used in their construction and restoration, and for evidencing the skill of well-known local stonemason John Anderson Tait in its fine detailing and decoration. The New Brighton War Memorial, amphitheatre, and setting are of high contextual significance both as a landmark in their location within the New Brighton beachfront area and for their relationship to other Christchurch memorials to the fallen of the World Wars. The New Brighton War Memorial, amphitheatre, and setting are of archaeological significance due to the presence of known human activity prior to 1900, and for their location near a traditional Māori travel route along Te Karoro Karoro (South Brighton Spit).

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REPORT DATED: 15 NOVEMBER 2021

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PLEASE USE IN CONJUNCTION WITH THE CHRISTCHURCH CITY COUNCIL HERITAGE FILES.

**CHRISTCHURCH DISTRICT PLAN – SCHEDULED HERITAGE PLACE
HERITAGE ASSESSMENT – STATEMENT OF SIGNIFICANCE
HERITAGE ITEM NUMBER 1401
*COMMERCIAL BUILDING AND SETTING, FORMER PUBLIC
TRUST OFFICE –
152 OXFORD TERRACE, CHRISTCHURCH***



PHOTOGRAPH: F WYKES - AUGUST 2020

HISTORICAL AND SOCIAL SIGNIFICANCE

Historical and social values that demonstrate or are associated with: a particular person, group, organisation, institution, event, phase or activity; the continuity and/or change of a phase or activity; social, historical, traditional, economic, political or other patterns.

The former Public Trust Office building has historical and social significance for its association with the Public Trust and its operations in Canterbury for over 70 years.

The Public Trust Office was established by Act of Parliament in 1872 to provide an independent and impartial trustee for colonists wanting to settle their estates in a careful fashion. The Canterbury branch of the Public Trust was established in Christchurch in 1880, an agency having been in existence since 1876. Initially the office had its premises in Cathedral Square and oversaw sub-agencies in Ashburton, Timaru and Oamaru. The Public

Trust Office Amendment Act 1912 enabled the trustee to delegate powers to Local Deputy Trustees. During the 1910s and 1920s the Public Trust decentralised and built purpose-built offices in regional centres throughout the country. The new Christchurch office of the Trust was designed in 1920 and opened in May 1925.

Ownership of the building transferred from the Public Trust in 1997. The building was then used as commercial premises by a variety of tenants in the 1990s and early 2000s. Prior to the 2010 and 2011 Canterbury earthquakes the building remained in use as an office space with a restaurant and bar occupying part of the ground floor.

The building is a rare interwar survivor of a professional services building which were once common in Hereford Street and in the area around Cathedral Square.

Applications to demolish the building under the Canterbury Earthquake Recovery Act were made in early 2014 (declined) and January 2015 (also declined) and the building was removed from the City Council's Heritage Schedule during District Plan hearings in 2016. Following this the building was sold to City Hall Ltd. in 2017, after they were awarded a Central City Landmark Heritage Grant to assist with the repair of the building. Work was undertaken on the building to retain and repair it over the following three years.

CULTURAL AND SPIRITUAL SIGNIFICANCE

Cultural and spiritual values that demonstrate or are associated with the distinctive characteristics of a way of life, philosophy, tradition, religion, or other belief, including: the symbolic or commemorative value of the place; significance to Tangata Whenua; and/or associations with an identifiable group and esteemed by this group for its cultural values.

The former Public Trust Office building has cultural significance for its association with the work of the Public Trust in Canterbury. The Public Trust was established in 1873 and provides services including wills and estate administration services. The Public Trust acts as trustee for people who do not have friends or relatives willing or able to undertake trustee duties. Public esteem for the building was shown by the response of members of the community who were concerned when it was under threat of demolition in 2014/15.

ARCHITECTURAL AND AESTHETIC SIGNIFICANCE

Architectural and aesthetic values that demonstrate or are associated with: a particular style, period or designer, design values, form, scale, colour, texture and material of the place.

The former Public Trust Office building has high architectural and aesthetic significance for its design by leading interwar architect Cecil Wood.

Cecil Wood was articled to Frederick Strouts and later worked for the firm of Clarkson and Ballantyne. He was also a partner with Samuel Hurst Seager for a time. As a sole practitioner, Wood's interwar works included the State Insurance building; Bishopscourt dwelling and chapel (dwelling demolished); the Hereford Street Post Office Savings Bank (demolished) and the High Street Post Office in Christchurch; the Public Trust Offices in Christchurch and Dunedin; and churches at Waiau, Woodbury, Fendalton, Tai Tapu, Cashmere, and Woodend. He was also noted for his domestic architecture.

The former Public Trust Office was one of Wood's first large-scale commercial commissions. It is the earliest of three of his major commercial works that combined features of Modernism with stripped classicism – the other two are the Hereford Street Post Office (1941, demolished) and State Insurance building (1935-37) on Worcester Street.

It is designed in a stripped Neoclassical style, with a symmetrical façade of vertical piers topped by a projecting parapet. The exterior features Sydney sandstone on the base, the Public Trust coat of arms above the entrance which features the wording 'SECURITY', and decorative torch holders. The name of the institution is set out on the face of the building below the projecting cornice. The Neoclassical corporate style of the Public Trust Office can also be seen in the other Public Trust buildings around the country, including those in Napier, Hamilton, Timaru, Gisborne, Nelson, Whangarei, and Auckland.

At the time of construction, the internal fittings were of Queensland maple, with marble lined public spaces on the ground floor. The ground floor consisted of a large banking chamber with restrained classical detail on the pillars and plaster ceiling. To the rear of the building was a two-storey annex that originally housed cars, bicycles and provided cloakrooms and was designed to allow for the future expansion of office space if necessary. The basement of the main wing was built with a fire and 'burglar proof' safety deposit strongroom with specially constructed steel lockers for public use. A revolving vehicle turning device was designed for the motor house.

Over time the building has undergone internal change, particularly in the 1970s with the insertion of a mezzanine level within the ground floor. However, aside from the entry doors the principal façade has remained relatively intact. The interior layout was changed by Willis and Associates - Architects Ltd. in 1992. In the 1990s a penthouse level was added to the building, set back to minimise its impact on the façade. Earthquake-strengthening was carried out in 2009, with the work including the incorporation of new shear walls to the full height of the building and the restoration of the original ground floor banking chamber, including the removal of the 1970s mezzanine floor.

The recent work to the building has resulted in the retention of the southern staircase, the lift shaft and glazing, the vehicle turntable and the safe doors in the basement. The lockers in the basement have been removed, as has the remaining marble on the ground floor. A great deal of internal decoration was removed during the strengthening in the late 2000's. A revolving door salvaged from the demolished former Pyne Gould Guinness building on the corner of Manchester and Cashel Streets has been installed at the main entrance from Oxford Terrace. The rooftop extension has been reconfigured with much of the 1980s work removed, and new additions created. This area is intended to accommodate a publicly accessible bar.

Because the interior of the building has been much altered, with the loss of the interior layout and original features over time, there is limited interior heritage fabric remaining. Interior heritage fabric is limited to the remaining original posts and beams, southern staircase, lift cab, lift shaft and lift glazing bars, the vehicle turntable and the safe doors in the basement and the revolving door at the main entrance. This fabric contributes to the heritage value of the former Public Trust Office building because it evidences its past use and the design aesthetic of the period in which it was built.

TECHNOLOGICAL AND CRAFTSMANSHIP SIGNIFICANCE

Technological and craftsmanship values that demonstrate or are associated with: the nature and use of materials, finishes and/or technological or constructional methods which were innovative, or of notable quality for the period.

The former Public Trust Office building has high technological significance as an inter-war example of reinforced concrete construction combined with the use of stone detailing on the

principal facade. The construction work by P Graham and Son is of a notable quality. Concrete and steel were used to create fireproof and 'burglar proof' basement chambers; the large safe doors and locking systems are of considerable technological value for their design. The vehicle turning mechanism is also of technological value for its design and innovation.

Craftsmanship detail is apparent in the base of the facade, which extends to the north over the vehicle entrance arch and is of Sydney sandstone. The coat of arms above the main entrance was carved by noted stonemason Frederick Gurnsey, who frequently worked with Cecil Wood; it is also of Sydney sandstone.

Works undertaken on the building between 2017 and 2020 have included the repair and retention of the western facade, the original staircase, the basement storey's former safety deposit store and the vehicle turntable. The Sydney sandstone base, previously painted, has been stripped and repaired with stone from the original quarry - which was opened specifically for the purpose. The retention of the west facade involved the introduction of a shear wall to the entire Oxford Terrace facade, which was cast through all the floor slabs. In addition, floor strengthening was undertaken which involved installing drag beams to increase the depth of the existing floor beams. Finally, a number of external walls have had an internal brick wythe replaced with reinforced concrete blockwork.

The revolving door, although not original to this building, is of technological and craftsmanship value for the skill evident in its construction, the quality of materials and the technology of the revolving mechanism.

CONTEXTUAL SIGNIFICANCE

Contextual values that demonstrate or are associated with: a relationship to the environment (constructed and natural), a landscape, setting, group, precinct or streetscape; a degree of consistency in terms of type, scale, form, materials, texture, colour, style and/or detail; recognised landmarks and landscape which are recognised and contribute to the unique identity of the environment.

The former Public Trust Office building and its setting has high contextual significance as a prominent landmark overlooking Oxford Terrace and the Avon River and because it is a key contributor to the group of scheduled heritage places in the immediate vicinity: the former Council Municipal Chambers, Worcester Street bridge, Mill Island and the Scott statue, Harley Chambers and the Canterbury Club - all survivors of the Canterbury earthquakes. The building has a degree of consistency with the Harley Chambers in terms of its materials and detailing. It shares a similar scale with its neighbouring building to the south (former General Accident Building). The former Public Trust building is also associated with the historic precinct values of the wider setting of the central business district and its remaining heritage buildings.

The building is located on a prominent site. It overlooks a portion of the riverbank reserve, between the Hereford Street and Worcester Street bridges, that is important to Christchurch's identity. Its distinctiveness from its neighbouring buildings and vacant sites in terms of its age and style, as well as its status as one of a small number of surviving heritage buildings in the central city contribute to its landmark qualities.

The setting consists of the immediate land parcel. The former Public Trust Office building occupies most of its site but a small right-of-way to the north of the building is included as part of the setting. This area provided vehicle access to the rear of the building. It was later incorporated into the development of the restaurant and bar areas however recent

strengthening works have restored the right-of-way. Iron gates feature at the entrance of this right of way.

ARCHAEOLOGICAL AND SCIENTIFIC SIGNIFICANCE

Archaeological or scientific values that demonstrate or are associated with: the potential to provide information through physical or scientific evidence an understanding about social historical, cultural, spiritual, technological or other values of past events, activities, structures or people.

The former Public Trust Office building and its setting have archaeological significance because the property has the potential to provide evidence relating to past building construction methods and materials, and human activity on the site, including that which occurred prior to 1900. Although the Public Trust Office building was not built until the 1920s, the 1862 Fooks map and 1877 Lambert map both show structures on this site.

ASSESSMENT STATEMENT

The former Public Trust Office building, its setting and noted interior fabric have high overall significance to Christchurch, including Banks Peninsula, for its long association with the Public Trust and as a surviving inner-city historic commercial building.

The building has historical and social significance as a reflection of the large-scale building programme undertaken by the Public Trust as it expanded its operations in the 1910s and 1920s. The former Public Trust Office building has cultural significance for its association with the work of the Public Trust in Canterbury. The building's high architectural significance arises from its Neoclassical design by leading inter-war architect Cecil Wood. It is considered one of his best commercial works. It has high technological and craftsmanship significance for its use of materials, detailing and reinforced concrete construction, and association with noted local building company P Graham and Son and leading Canterbury sculptor Frederick Gurnsey. The former Public Trust Office building and its setting has high contextual significance as a prominent landmark fronting the Avon River and as part of a group of listed places in the immediate vicinity (including the former Council Municipal Chambers, Worcester Street bridge, Mill Island and the Scott statue) and wider setting of the central business district. The building and its setting have archaeological significance because the property has the potential to provide evidence relating to past building construction methods and materials, and human activity on the site, including that which occurred prior to 1900.

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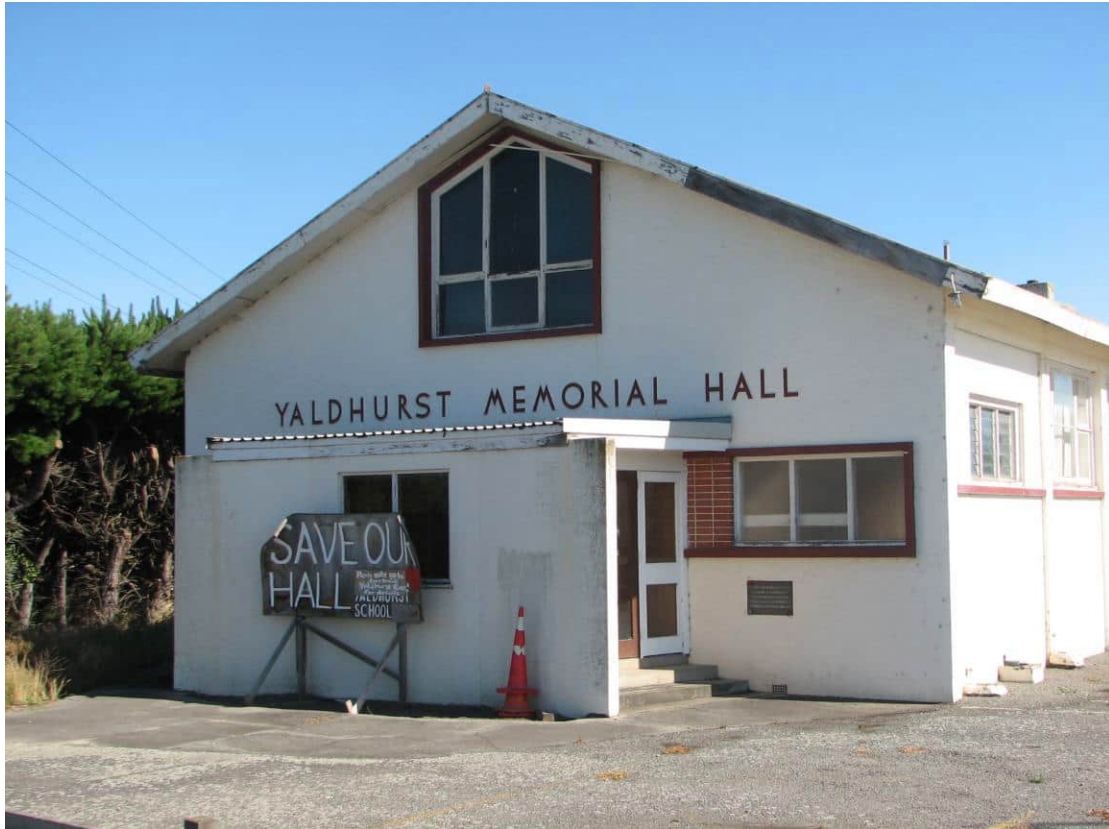
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REPORT DATED: 24 SEPTEMBER 2021

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PLEASE USE IN CONJUNCTION WITH THE CHRISTCHURCH CITY COUNCIL HERITAGE FILES.

**CHRISTCHURCH DISTRICT PLAN – SCHEDULED HERITAGE ITEM
HERITAGE ASSESSMENT – STATEMENT OF SIGNIFICANCE
HERITAGE ITEM NUMBER 1429
*YALDHURST MEMORIAL HALL AND SETTING -
524 POUND ROAD, YALDHURST***



PHOTOGRAPH: G. WRIGHT 29/01/2019

HISTORICAL AND SOCIAL SIGNIFICANCE

Historical and social values that demonstrate or are associated with: a particular person, group, organisation, institution, event, phase or activity; the continuity and/or change of a phase or activity; social, historical, traditional, economic, political or other patterns.

The Yaldhurst Memorial Hall has historical and social significance due to the role it has played in the social life of the local Yaldhurst community, as the local war memorial hall which contains the rolls of honour for those from the area who served in WWI and WWII, and as a product of the government's World War Two 'living memorial' subsidy scheme. It was built as a facility during the mid-twentieth century when community activity characteristically revolved around the local hall and involved a coordinated effort from the Yaldhurst community over an extended period.

In the period after WWII, the government decided New Zealand already had enough symbolic war memorials, and new commemorative efforts would be better channelled into so-called 'living memorials'; community facilities whose use and enjoyment would be an active tribute to the values of the 'Fallen'. A pound for pound subsidy scheme to match community-raised donations was introduced in late 1946 and was immediately popular. Over a period of about a decade and a half, 320 memorial facilities across the country were approved for subsidy. Nominally the definition of facilities was wide, but the government was enthusiastic about the multi-use possibilities of the 'community centre' and encouraged these, largely, to

the exclusion of other proposals. Consequently, of the 320 approved facilities, some 280 were war memorial community centres. The majority of these halls were located in rural communities, which welcomed the opportunity to build (or in some cases rebuild) a modern community gathering place. The average rural subsidy was £3,500. Altogether, the government invested £1.6 million in the scheme.¹ Within the boundary of today's Christchurch District, five community centre projects (Somerfield, North New Brighton, Mt Pleasant, Diamond Harbour, Yaldhurst) and one sports pavilion (Rawhiti Domain), received war memorial subsidies during the 1950s. Two of these (Diamond Harbour and Yaldhurst) were rural facilities; the remainder were urban.

The Yaldhurst Soldiers' Memorial Committee was formed at a meeting on 27 February 1946 with the object of building a war memorial hall. The Yaldhurst proposal remained wholly independent of the scheme until mid-1948 when the committee investigated the possibility of receiving a subsidy.

The subsidy scheme had a number of conditions that had to be met in order for a hall proposal to be eligible. Application had to be received by the Department of Internal Affairs by 16 November 1950, the hall had to be the district's official war memorial, the local authority had to be willing to take ownership of the facility on completion, and funds to be subsidized had to be lodged with the local authority by June 1953. Between 1946 and the date of Yaldhurst's subsidy application in the latter part of 1948, considerable fundraising had already taken place – such that the committee had £1,747 in their account in May 1949. In September 1950 their projected facility was, however, loosely costed at somewhere between £6,600 and £10,000. To gain maximum benefit from the scheme, the Yaldhurst community needed to raise up to £3,000 in little more than four years. Fundraising initiatives by the Yaldhurst Hall Committee over this period included raffles, dances, a gymkhana, potato growing, and an annual ploughing match. The land for the hall was donated by the Kyle family. In total Yaldhurst residents raised some £6,000 towards the cost of their new hall.

In February 1954 a contract was signed with construction firm Hewlett and Croft for £9,636 /10/11; later revised up to £10,056/10/11. As Yaldhurst had raised such a substantial amount, government was not only able to meet half of this cost, but also half the cost of fitting out and furnishing the building as well. This included a war memorial plaque, trestle tables, chairs, a piano, crockery and stage curtains. Many of these items remain in the hall today. In 1955 an additional subsidy was provided for heaters and a block fence.

The Yaldhurst War Memorial Hall was officially opened on Saturday, 4 December 1954 by local MP (and Minister of Railways) J. K. McAlpine before a crowd of 320. The formalities were followed in the evening by a ball attended by 500. The total cost of the completed facility was just under £12,000. This sum does not however account for the considerable amount of voluntary labour contributed during the nine years it took to complete the project. Due to its fundraising efforts, Yaldhurst's £6000 government subsidy was a third greater than that offered to any of the other five successful Christchurch applicants.

During the mid-twentieth century the Yaldhurst Hall provided the venue for meetings of local clubs and societies including the Yaldhurst Women's Division of Federated Farmers (YWDF) and Young Farmers, a table tennis club and indoor bowls. It also played host to a wide range of social functions including weddings, 21sts and district farewells. The regular Saturday night dance 'down the hall' was the social highlight of the week in many rural communities, and dancing played a big part in the early history of Yaldhurst Hall. Soon after it was completed, a social committee was formed to stage a regular fortnightly dance. This proved very successful initially, but with the advent of rock & roll in the early 1960s, public tastes changed and patronage declined. In 1962 the committee contracted a 'more modern' band, *The Silhouettes* to organise regular dances on their behalf. These dances came to an end in 1968. Occasional dances were also organised by local organisations; in 1958 these included

¹ J. Phillips. *To the Memory: New Zealand's War Memorials* Nelson: Potton and Burton, 2016. pp 169-192.

J. Phillips. 'Memorials and Monuments: memorials to the Centennial and the Second World War' *Te Ara* accessed 5 February 2020 <https://teara.govt.nz/en/memorials-and-monuments>

the Yaldhurst and Gilberthorpe School Committees, the tennis and swimming clubs, Yaldhurst Federated Farmers and YWDFF. Live music was not always a feature however, and a disc jockey console from this era remains in the hall's store room.

From the late 1960s, factors such as rural depopulation, better transport links and the advent of television led to a decline in traditional modes of communal interaction and a corresponding decrease in local hall use across New Zealand. The end of regular dances in the late 1960s signalled this change for the Yaldhurst Hall, however although the Hall was subject to these social trends, it did remain in fairly consistent use until 2011. The hall therefore remains an evocative time capsule of its post-war heyday. From the 1970s the meetings of the hall committee became more intermittent, and there was apparent difficulty in recruiting community members to put time and effort into hall administration. As a consequence, from the 1990s there were increasing calls for the city council to provide a greater degree of administrative support. The Yaldhurst War Memorial Hall Committee continued however until the hall was closed by the Canterbury Earthquake Sequence of 2010-2011. The hall remains closed today pending decisions on its future. A local residents' group have been campaigning for its retention and reinstatement as a community facility.

CULTURAL AND SPIRITUAL SIGNIFICANCE

Cultural and spiritual values that demonstrate or are associated with the distinctive characteristics of a way of life, philosophy, tradition, religion, or other belief, including: the symbolic or commemorative value of the place; significance to Tangata Whenua; and/or associations with an identifiable group and esteemed by this group for its cultural values.

The Yaldhurst Memorial Hall has high cultural and spiritual significance as the district's WWI and WWII memorial, and as a 'community centre' built under a government war memorial scheme that encouraged this particular form of social initiative.

The Yaldhurst Memorial Hall's commemorative purpose is proclaimed by the name in raised letters across the front of the building, by a foundation stone with a memorial dedication, and by two marble 'rolls of honour' flanking the stage – one for each of the world wars. The WWI roll was transferred from the local school; the new WWII roll was designed to match it. When the hall was officially opened by J. K. McAlpine on 4 December 1954, he appealed ... *to those whose responsibility it is to maintain this structure and those who make use of it to respect at all times the significance for which it stands. It represents the supreme sacrifice by the few for the many, so that those who follow may enjoy the fruits of that sacrifice in what we hope will be many decades of peace.*² The hall and its two rolls of honour were then dedicated by Rev. H. G. Norris, former chaplain to the 25th Battalion.

The hall demonstrates a distinctive characteristic of a way of life in mid-twentieth century New Zealand when local halls played an important role in their communities. The importance of the hall to the Yaldhurst community in the mid-twentieth century is evidenced by the extent of community effort that went into fund raising for the hall, and the range of social and community functions it subsequently fulfilled. A campaign to save the hall by the local residents group is evidence that the building is still considered to have significance to this community.

ARCHITECTURAL AND AESTHETIC SIGNIFICANCE

Architectural and aesthetic values that demonstrate or are associated with: a particular style, period or designer, design values, form, scale, colour, texture and material of the place.

The Yaldhurst Memorial Hall is architecturally and aesthetically significant as an example of the community centres built under the government's WWII memorial subsidy scheme. It substantially retains its 1950s form and fabric.

One of the conditions of the war memorial subsidy scheme was that hall plans had to be approved in advance by the Internal Affairs Department. Memorial halls came in a wide variety of designs traversing most of the early twentieth century's architectural styles, from

² *Press* 6 December 1954

humble vernacular timber or corrugated iron buildings to local variants of Art Deco, Moderne and Modernism. What they did have in common was the basic formula - a hall, a supper room and a kitchen.

The Yaldhurst Hall Committee began their design deliberations in 1949 by inspecting the new RSA halls in Rangiora, Southbridge and Papanui to inform their planning. An initial concept from architect R. A. Heaney was approved by Internal Affairs in 1951. Heaney was later replaced with L. G. Childs in 1952. After a long delay, Child's design was approved by the government in November 1953. Tenders were called immediately. Successful tenderer Hewlett and Croft worked quickly, and the completed Yaldhurst War Memorial Hall was handed over on 31 August 1954.

The new Yaldhurst Hall was a large building for what was then a small, primarily rural community. Designed in a functional modernist style and built in reinforced concrete and concrete block, the exterior is largely utilitarian. A fuel store was added to the rear in 1957 and a new entrance foyer on the frontage in 1959.³ These later projects do not appear to have received a memorial subsidy. The interior consists of a pinex-lined 18 m main hall with a polished rimu floor, a supper room, a committee room, a large, fitted kitchen with a stainless steel bench and twin hatches (with a raked hood) through which tea would have been dispensed, and a projection booth (although there is no evidence that this was ever fitted out and utilised). 'Gentlemen' and 'Ladies' toilets flank the entry; these are marked with both painted and back-lit glass signs so the facilities could be located when lights were dimmed. The compact varnished ply-lined foyer contains a small ticket office whose multiple compartments suggest that it once also sold cigarettes or sweets. The interior layout and spaces, structure and linings, fixtures, hardware, materials and finishes are notably intact and are evocative of their era. The whole interior is therefore considered to be part of the heritage item. The building was damaged in the Canterbury Earthquake sequence of 2010-2011. Assessed as earthquake-prone, it is currently closed pending decisions on its future.

TECHNOLOGICAL AND CRAFTSMANSHIP SIGNIFICANCE

Technological and craftsmanship values that demonstrate or are associated with: the nature and use of materials, finishes and/or technological or constructional methods which were innovative, or of notable quality for the period.

The Yaldhurst Memorial Hall has technological and craftsmanship significance as a well-appointed public hall of the post-war years, built in materials that were of a high quality, and innovative for the time. The level of community and government funding available for the Yaldhurst Hall ensured that the hall was a particularly well-constructed building for its time. The technology and materials employed (a reinforced concrete frame with concrete block panels) support this interpretation. Large scale commercial concrete block production in New Zealand began in Christchurch in the early 1950s, and although reinforced block construction rapidly became popular, the choice of block for the Yaldhurst Hall in 1953 was still relatively novel.⁴ None of the other war memorial facilities built under the government's subsidy programme in Christchurch utilized this form of construction. Elements of the interior fit-out also have craftsmanship significance, including the notably large and original fitted kitchen with its hooded serving hatches and stainless steel benches and the polished rimu floor in the main hall.

CONTEXTUAL SIGNIFICANCE

Contextual values that demonstrate or are associated with: a relationship to the environment (constructed and natural), a landscape, setting, group, precinct or streetscape; a degree of consistency in terms of type, scale, form, materials, texture, colour, style and/or detail; recognised landmarks and landscape which are recognised and contribute to the unique identity of the environment.

³ Yaldhurst Soldiers' Memorial Hall Committee (later Yaldhurst War Memorial Hall Committee) files 1946-2003.

⁴ N. Isaacs *Making the New Zealand House 1792-1982* Phd. thesis, Victoria University 2015, p155.

The Yaldhurst Memorial Hall has contextual significance in relation to its site and setting. The hall is located on a large site at the southeast corner of the busy intersection of Yaldhurst and Pound Roads. It is set back from the corner but surrounded on the west and north sides by open metalled carpark, making it a highly visible landmark. When the hall was opened in 1954, its environs were wholly rural. Despite the volume of traffic now passing, and the proximity of the urban area of the city, the hall still has paddocks and shelter belts on its eastern and southern boundaries, and so retains something of this rural aspect. The scheduled setting consists of the immediate land parcel.

ARCHAEOLOGICAL AND SCIENTIFIC SIGNIFICANCE

Archaeological or scientific values that demonstrate or are associated with: the potential to provide information through physical or scientific evidence and understanding about social historical, cultural, spiritual, technological or other values of past events, activities, structures or people.

The Yaldhurst Memorial Hall and setting are of archaeological value because they have the potential to provide archaeological evidence relating to past human activity on the site including that which occurred prior to 1900. Prior to the hall's construction in 1953-54, the site was agricultural land.

ASSESSMENT STATEMENT

The Yaldhurst Memorial Hall and setting, including the whole interior, are of overall significance to the Christchurch district including Banks Peninsula.

The Yaldhurst Memorial Hall has historical and social significance due to the role it has played in the social life of the local Yaldhurst community and as the local war memorial hall which contains the rolls of honour for those from the area who served in WWI and WWII and as a product of the government's World War Two 'living memorial' subsidy scheme. The hall is of high cultural and spiritual significance as the Yaldhurst community's dedicated war memorial to both world wars. It demonstrates a distinctive characteristic of a way of life in mid-twentieth century New Zealand when local halls played an important role in their communities as evidenced by the extent of community effort that went into fundraising for and constructing the hall. The hall is of architectural and aesthetic significance as a modernist vernacular hall designed by L.G. Childs. The interior is notably intact and is therefore considered to be part of the heritage item. The Yaldhurst Memorial Hall has technological and craftsmanship significance as a well-appointed public hall of the post-war years, built in materials that were of a high quality, and innovative for the time. The hall has contextual significance in relation to what remains a primarily rural site and setting at the intersection of Pound and Yaldhurst Roads in the peri-urban township of Yaldhurst. The hall and setting are of archaeological significance because they have the potential to provide archaeological evidence relating to past human activity on the site including that which occurred prior to 1900.

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The Press

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**CHRISTCHURCH DISTRICT PLAN –SCHEDULED HERITAGE PLACE
HERITAGE ASSESSMENT – STATEMENT OF SIGNIFICANCE
HERITAGE ITEM NUMBER 1433
*DWELLING AND SETTING -
35 RATA STREET, RICCARTON***



PHOTOGRAPH: GARETH WRIGHT, 19.3.2019

HISTORICAL AND SOCIAL SIGNIFICANCE

Historical and social values that demonstrate or are associated with: a particular person, group, organisation, institution, event, phase or activity; the continuity and/or change of a phase or activity; social, historical, traditional, economic, political or other patterns.

35 Rata Street has historical and social significance for its association with first owner Kate Passmore (nee Kincaid) and the Kincaid family of grocery retailers and for its long-standing association with prominent peace activists Kate Dewes and Robert Green, and the role it played in their national and international peace activism.

The house is located on land which once formed part of an area of bush known to Māori as Pūtārikamotu. The bush has been identified by Ngāi Tūāhuriri kaumātua as a kāinga nohoanga (settlement), kāinga mahinga kai (food-gathering place), and he pā tūturu where tuna (eels), kanakana (lamprey), and aruhe (bracken fernroot) were gathered.¹ The land was later part of the Deans' family property *Riccarton* which includes Riccarton Bush Pūtaringamotu, a remnant stand of the Kahikatea floodplain forest. Brothers William and John Deans located their farm – the first permanent European farm on (what would become) the Canterbury Plains – here in 1843. They later named the property *Riccarton* after their home parish in Scotland. After organised European settlement commenced, the lease was

¹ Pūtārikamotu, <https://www.kahurumanu.co.nz/atlas>

negotiated into a 400 acre freehold at Riccarton and an additional grazing property on the plains west of the city. Beginning in the 1880s, the Deans family began to sell off the Riccarton property. The area between Riccarton Bush and Riccarton Road comprising Kauri, Rata and Rimu Streets was subdivided in 1912.

In January 1923 a section in Rata Street was sold to Kate May Kincaid (1895-1965). Kate was the eldest daughter of prominent businessman Thomas Kincaid, proprietor of successful Colombo Street grocery retailer, Kincaid's. The Kincaid family were at the time living a short distance away at *Baron's Court* (now better known as *Antonio Hall*). Kate married manufacturer James Thomas Passmore (?-1972) in 1924 and apparently played a role in the governance of her father's company; board meetings reputedly took place in her new home.² In 1935 the Passmores relocated to Nelson and 35 Rata Street was eventually sold in 1941 to company manager Arthur Joseph O'Brien.³

Arthur O'Brien (1902-1945) was the managing director of M. O'Brien & Co, the large Dundas Street-based footwear manufacturer founded by his grandfather Michael in the nineteenth century. On his premature death in 1945 at the age of only 43, Arthur's wife of eight years Beatrice Gertrude (Gertrude) was left with four young children. 35 Rata Street remained the O'Brien family home until 1969.⁴

In 1971 the property was sold to Kenneth Stuart Adam and his wife Gale. Adam was a practising psychiatrist and a clinical psychology lecturer at the University of Canterbury for a decade before returning to Canada around 1980. During his time at Rata Street, one of the front rooms was used as a consulting room. After the Adams' sold the property in 1979, it passed through several hands in quick succession before being purchased by Catherine Frances Boanas (Kate Dewes) and her then husband John Boanas in 1983.

Dr Kate Dewes has been a leading figure in the peace and disarmament movement both nationally and internationally since the early 1980s. Coalescing around anti-nuclear issues from the 1960s, peace and disarmament has been an important key socio-political progressive movements of the last sixty years. For much of this time, Christchurch has been at the centre of the movement in New Zealand. The NZ Campaign for Nuclear Disarmament (lead by Elsie Locke, amongst others) began here in 1960, and retired local magistrate Harold Evans initiated the World Court Project in 1986.

Dewes' Rata Street home has been a locus of peace activism in the city, serving as both office and well-utilised meeting space. In this capacity many peace and anti-nuclear groups have convened here, and many important individuals have visited – including Prime Ministers David Lange and Helen Clark, and World Court Vice President Judge Weeramantry. In the late 1970s Dewes became involved with the Peace Foundation, a group founded in New Zealand in 1975 to promote the values of peace through practical measures such as education. Between 1980 and 1998 she coordinated the Foundation's South Island office from her home. During this period, Dewes facilitated the establishment of Peace Studies at the University of Canterbury, which she subsequently taught for 20 years. She also played key roles in bringing about New Zealand's ground-breaking 1987 nuclear-free legislation and, with future husband Robert Green, in the 'World Court Project', a citizen-lead legal challenge to nuclear deterrence that led to the historic judgement by the World Court of Justice in 1996 that nuclear weapons are illegal under international law.

In 1998 Dewes and Green established the Disarmament and Security Centre at 35 Rata Street, a specialist centre for the Peace Foundation focussing on disarmament and security issues; this became a separate entity in 2004 and they remain co-directors. During the last two decades, Dewes has served as the New Zealand expert on the United Nations Study on Disarmament and Non-proliferation Education (2000-2002) and as an appointment by UN Secretary General Ban to his Advisory Board on Disarmament Matters (2007-2013). In 2001

² Pers. Comm. G. Wright, C. Dewes 19 March 2020.

³ *Press* 9 February 1935 p28; 7 June 1937; 14 December 1938 p1.

⁴ *Press* 29 March 1945.

she was created an Officer of the New Zealand Order of Merit for services to the peace movement.

Commander Robert Green RN (retired) served twenty years (1962-1982) with the British Royal Navy, principally as a bombardier navigator. On promotion to Commander in 1978 he worked for the UK Ministry of Defence and then as Staff Officer (Intelligence) to the Commander in Chief Fleet during the 1982 Falklands conflict. The high-profile 1984 murder of an activist aunt and the unstable geo-political situation of the late 1980s prompted his active involvement in opposition to nuclear power generation and nuclear weapons. In 1991 Green became chair of the UK branch of the World Court Project. After marriage to Dewes in 1997 he emigrated to NZ. He has written extensively on security and disarmament issues.⁵

CULTURAL AND SPIRITUAL SIGNIFICANCE

Cultural and spiritual values that demonstrate or are associated with the distinctive characteristics of a way of life, philosophy, tradition, religion, or other belief, including: the symbolic or commemorative value of the place; significance to Tangata Whenua; and/or associations with an identifiable group and esteemed by this group for its cultural values.

35 Rata Street has cultural significance as an inter-war dwelling in Riccarton, reflecting the tastes and way of life of first owners James and Kate Passmore. The dual entrances and interconnecting open-plan nature of the interior layout of the principal rooms evidence this public facing aspect of the dwelling. The cultural significance of the dwelling is further enhanced due to its association with the peace movement in the city. Christchurch has been at the centre of the peace movement in New Zealand since the second half of the 20th century, with the city being declared New Zealand's first peace city in 2002. As the home and workplace of leading peace and disarmament campaigners Kate Dewes and Robert Green, 35 Rata Street has been a centre of peace activism in the city for nearly forty years.⁶ The house, with its generous principal rooms, played an integral role as a base for their activities, both as an office and a meeting space, reflecting a distinctive way of life that integrated activism with domestic life. The wider area has cultural significance as part of Pūtarikamotu, an area that has played an integral role in the way of life of tangata whenua.

ARCHITECTURAL AND AESTHETIC SIGNIFICANCE

Architectural and aesthetic values that demonstrate or are associated with: a particular style, period or designer, design values, form, scale, colour, texture and material of the place.

35 Rata Street has architectural and aesthetic significance as a good example of a larger well-crafted Arts and Crafts-style dwelling of the interwar period. The Rata Street section was purchased by Kate Kincaid (later Passmore) in 1923, and it is believed the house was completed the following year. The architect [or designer] has not been confirmed however the house does exhibit features synonymous with leading Christchurch domestic architects of the period, the England Brothers, including extensive use of timber shingles, a slate roof, rectilinear leaded feature windows and toplights with rippled clear glass, and porches and projecting eaves with substantial corbels. England Brothers advertised a tender in Rata Street in late 1923 which lends support to the case for their involvement.⁷ The dwelling is a large one-and-a-half storey weatherboard Arts and Crafts-style bungalow. Its high gabled slate roof sits side-on to Rata Street, with two secondary gables facing north. Both main and secondary gables are shingled. Unusually the dwelling's window joinery is a mix of timber and steel casements. Steel windows have not been widely employed in domestic design in Christchurch, and this is an early example of their use.

The reception rooms, halls, passage and bedrooms have form, finishes and fittings commonly seen in bungalows of this period. Typical elements include beamed ceilings, panelling, built-in furniture and distinctive door and window hardware. The principal rooms have an open-plan flexible layout that suggests the house was designed for entertaining and/or business

⁵ Pers. Comm. G. Wright, K. Dewes 19 March 2020; <http://www.disarmsecure.org/about-us>; https://en.wikipedia.org/wiki/Kate_Dewes

⁶ <https://ccc.govt.nz/the-council/civic-and-international-relations/christchurch-peace-city>

⁷ *Press* 11 September 1923 p15.

use. There are two main entries, with the street-facing front door augmented by a significant side entry from the drive. A third unusual exterior door, possibly an addition, on the east elevation opens from a set of exterior steps directly onto the stair landing. The panelled stair to the two small first floor bedrooms is concealed behind a domestic-scaled door identical to others in the passage.

In 2000 alterations and additions were made to the first floor to make it a self-contained living space. Two additional dormers were added to the rear of the main gable. In the 2010-2011 Canterbury Earthquake sequence, all four large chimneys sustained significant damage and were subsequently removed in their entirety. As a consequence, just one of the original tiled fireplaces remains in-situ; this has a log burner insert. Earthquake repairs have been undertaken, but further remedial repairs are programmed. These are to include the potential replacement of the principal steel windows. In the decade since the earthquakes, the kitchen-living room area at the rear of the dwelling has been significantly altered, and a conservatory added. These spaces retain relatively little heritage fabric or value.

Although alterations have been made over time, the whole interior is considered to be part of the heritage item, including the layout and spaces, structure and linings, fixtures, hardware, materials and finishes because of the large extent of heritage fabric that remains throughout. The interior features beamed ceilings, timber panelling, timber door brackets, built-in furniture, doors, fittings, joinery, fire surrounds and mantelpieces, stair and timber balustrade, and distinctive door and window hardware. The interior reflects the way of life of the original and subsequent owners - in particular the open plan flexible main spaces, sliding doors and different entrances evidence the use of the building as a dwelling and meeting place.

TECHNOLOGICAL AND CRAFTSMANSHIP SIGNIFICANCE

Technological and craftsmanship values that demonstrate or are associated with: the nature and use of materials, finishes and/or technological or constructional methods which were innovative, or of notable quality for the period.

35 Rata Street has technological and craftsmanship significance due to aspects of its construction and the quality of the design and materials. It is an early example in Christchurch of the employment of steel windows in a domestic context. The craftsmanship and quality of the materials employed, whilst not untypical of the period, are notable due to the level of detailing particularly in the metal and timber work. Evidence of the detailing is to be seen, for instance, in the metal hardware such as the door handles and window latches and in the quality and design of the built in timber furniture, doors and timber detailing. The steel joinery, slate roof and extensive interior woodwork indicate that this was of good quality construction for the period.

CONTEXTUAL SIGNIFICANCE

Contextual values that demonstrate or are associated with: a relationship to the environment (constructed and natural), a landscape, setting, group, precinct or streetscape; a degree of consistency in terms of type, scale, form, materials, texture, colour, style and/or detail; recognised landmarks and landscape which are recognised and contribute to the unique identity of the environment.

35 Rata Street has contextual significance on its site and in its setting - which are contiguous – and also within its immediate suburban environment, which contains a number of dwellings contemporary with this address. The suburban section is located on the south side of Rata Street, between Riccarton Bush and the busy thoroughfare of Riccarton Road. The house is located towards the front of the section - with an established ornamental front garden, which includes mature trees, and a larger area containing vegetable plots at the rear – and is located close on the eastern boundary to allow a driveway to pass to the west. The rear portion of a double garage appears to be contemporary with the house. Although there is now a mixture of new and earlier houses in Rata Street it has largely retained the scale of the early street. Those dwellings contemporary with 35 Rata Street retain similarities in terms of type, form, materials and style, set against the backdrop of Riccarton Bush Pūtarīngamotu.

ARCHAEOLOGICAL AND SCIENTIFIC SIGNIFICANCE

Archaeological or scientific values that demonstrate or are associated with: the potential to provide information through physical or scientific evidence and understanding about social historical, cultural, spiritual, technological or other values of past events, activities, structures or people.

35 Rata Street and its setting are of archaeological significance because they have the potential to provide archaeological evidence relating to past human activity on the site including that which occurred prior to 1900. As part of Pūtārikamotu an area recorded by Ngāi Tūāhuriri kaumātua as a forested area rich in bird life which was a kāinga nohoanga (settlement), kāinga mahinga kai (food-gathering place), and he pā tūturu where tuna (eels), kanakana (lamprey), and aruhe (bracken fernroot) were gathered, this area has archaeological significance.⁸ Between the early 1840s and 1912 the site was part of the Deans' family's *Riccarton* farm and estate. The development of the site for housing in the early 20th century would have impacted the potential for archaeological evidence to remain.

ASSESSMENT STATEMENT

35 Rata Street, its setting and the whole interior are of overall significance to the Christchurch district, including Banks Peninsula. The dwelling has historical and social significance for its association with Kate Passmore and the Kincaid family of grocery retailers, and for its long-standing association with prominent peace activists Kate Dewes and Robert Green and the role the dwelling played in their national and international peace activism. The dwelling has cultural significance reflecting the tastes and way of life of its first owners, with the dual entrances and interconnecting open-plan nature of the interior evidencing the public facing aspect of the dwelling. The cultural significance is further enhanced due to its association with the peace movement in the city, a movement for which the city is recognised for its long standing contribution. The dwelling has architectural and aesthetic significance as an example of a larger Arts and Crafts-style bungalow of the interwar period, and for the quality of its interior form and fabric. The dwelling has technological and craftsmanship significance as an early example in Christchurch of the employment of steel windows in a domestic context and for the quality of its construction and fit-out, particularly the metal and timber work which is representative of the standards of the period. The dwelling has contextual significance in relation to its site and suburban setting in proximity to Riccarton Bush. The dwelling and setting are of archaeological significance because they have the potential to provide archaeological evidence relating to past human activity on the site including that which occurred prior to 1900.

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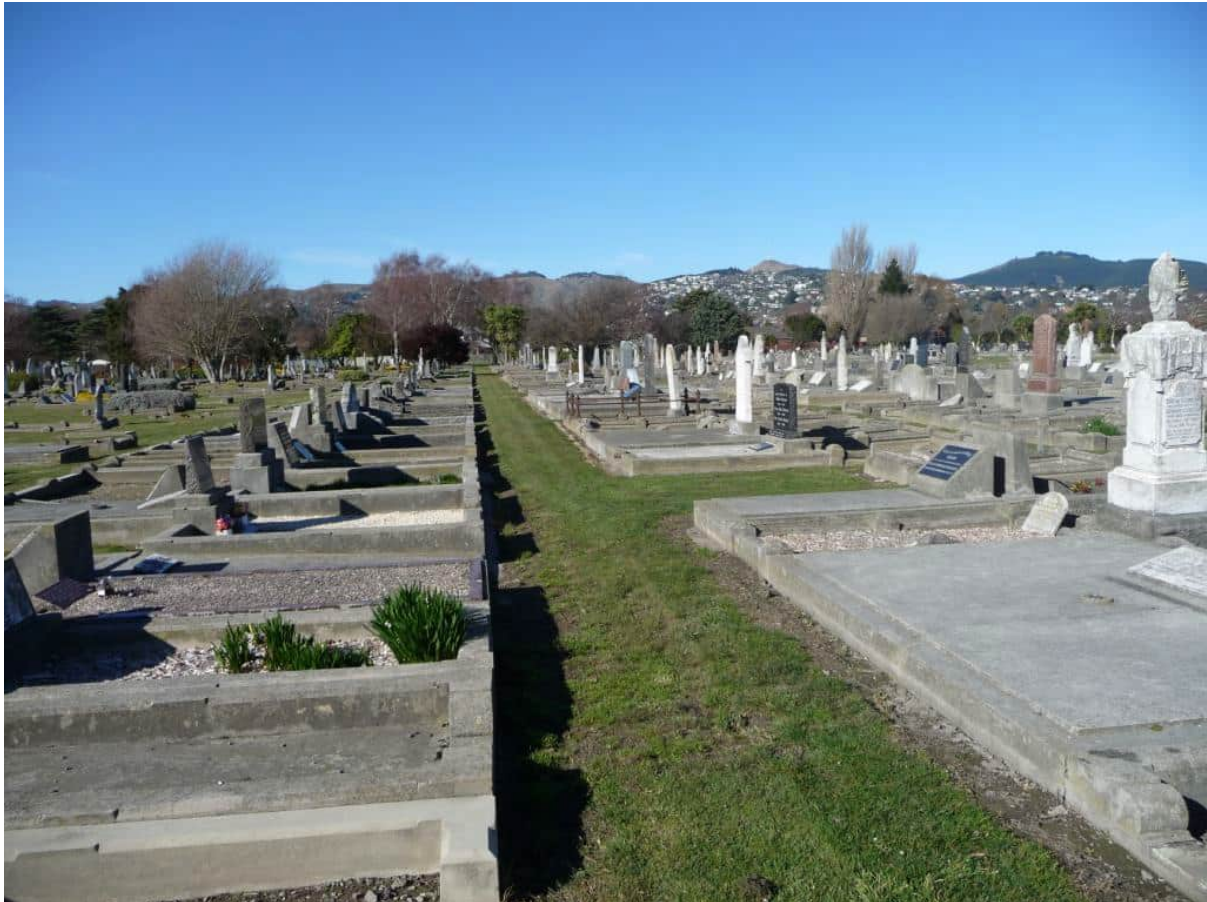
REPORT DATED: 30/9/2021

⁸ Pūtārikamotu, <https://www.kahurumanu.co.nz/atlas>

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**CHRISTCHURCH DISTRICT PLAN –SCHEDULED HERITAGE PLACE
HERITAGE ASSESSMENT – STATEMENT OF SIGNIFICANCE
HERITAGE ITEM NUMBER 1443
*SYDENHAM CEMETERY -
34 ROKER STREET, CHRISTCHURCH***



PHOTOGRAPH: CHRISTCHURCH CITY COUNCIL 22/01/2014

HISTORICAL AND SOCIAL SIGNIFICANCE

Historical and social values that demonstrate or are associated with: a particular person, group, organisation, institution, event, phase or activity; the continuity and/or change of a phase or activity; social, historical, traditional, economic, political or other patterns.

Sydenham Cemetery is of high historical and social significance as Christchurch's second municipal cemetery, and one which has been in continual use since its establishment in 1896 to the present day. Its burials represent a cross section of cultures, religious beliefs, and social classes within Christchurch society over a period of more than a hundred years.

By the late 1880's, the Addington and Barbadoes Street cemeteries, which had historically served the southern side of Christchurch, were at capacity, and the Sydenham Borough Council determined to open a new public cemetery to cater for the nearby suburbs. While the Sydenham Borough treasurer originally announced that £2000 (accrued from interest on unspent loan money) was available for the creation of a cemetery, a group of Sydenham ratepayers opposed the use of these funds for cemetery purposes, arguing that demand for a cemetery was not strong enough to prioritise spending over other projects such as water channelling. Progress on the creation of a Sydenham cemetery was delayed after objecting petitions with more than 700 signatures presented to the Sydenham Borough Council. In the meantime, Sydenham residents were buried in Linwood Cemetery, which had opened

to the east of the city in 1885. By the time the council was able to proceed with the Sydenham cemetery, the original funds had been spent and finance for the project had to be drawn from ratepayers and a loan.

In February 1896 the Council purchased 15 acres of land from landbrokers Harman and Stevens and began preparing it for cemetery use. In April 1896 the Council advertised for a sexton, and in May it resolved to name the new cemetery Sydenham Public Cemetery. The cemetery was ready for use by the end of 1896, and in November/December a circular was sent to the heads of the religious denominations likely to use the cemetery informing them that portions of the ground had been set apart for the exclusive use of various denominations. The Church of England portion was consecrated by the Bishop of Christchurch in 1897, followed by the other denominations as the cemetery filled. A mortuary chapel was constructed in the centre of the cemetery in 1906, but it fell into disrepair in the second half of the twentieth century and was demolished in 1980. A sexton's house had been built to the right of the entrance by 1901, but this was demolished in 2000 to make room for an ashes plot. A 1908 shelter that was originally located to the left of the driveway at the entrance was relocated to the site of the sexton's cottage at this time.

Deaths resulting from the 1918 flu pandemic caused an influx of burials at Sydenham. At the height of the pandemic, it was reported that coffins were stacked three and four deep under the trees lining the entrance to the cemetery. The sexton stated that he had been continuously working for sixteen hours a day burying bodies and was unable to keep up with the load without assistance.¹

Sunnyside Lunatic Asylum (later known as Sunnyside Hospital, and currently as Hillmorton Hospital), which had opened in 1863, had patients die within their care, from conditions such as epilepsy, tuberculosis, or dementia. After the opening of the cemetery in 1896, many of these patients were interred in Sydenham; a majority were buried in sections of the cemetery marked as 'free' on the cemetery plan, in graves that are often unmarked. These 'free' areas, including a large grassy area in the eastern section of the cemetery, contain fewer grave markers than areas in which a plot needed to be purchased. Patients from Sunnyside were commonly buried in Sydenham Cemetery until the 1980's, with the total number of such burials estimated to be in the hundreds, considering 135 burials were recorded in a sample set of seven years prior to 1916.²

Sydenham Public Cemetery is the resting place of citizens from all social strata of Christchurch. Some notable figures of the late 19th, 20th, and 21st centuries buried in Sydenham include Luke Adams, who established a successful pottery works in Sydenham in 1881; Charles Allison, who was Sydenham's Town Clerk and Surveyor from 1879-1903 and later Mayor of Christchurch (1908-10); Frank Hitchings, an astronomer and builder of the 'Blackheath' block of terrace houses on the corner of Wordsworth and Durham Streets; Ishwar Ganda, city councillor and well-known member of Christchurch's Gujarati community; Kate Marsh, Ngaio Marsh's mother; Rose/Rosa Juriss, and Kate Baldwin, headmistress of the girls' department of Gloucester Street (now Christchurch East) School, a position she held from 1898. Further research is required to identify further women of note who are buried in the cemetery.

The cemetery has historical associations with the Indian community of Christchurch. Several of the workers who came from India to Christchurch in the employ of John Cracroft Wilson of Cashmere, as well as their descendants, are buried in the cemetery. Many members of the Christchurch Gujarati community have been buried in the cemetery since the 1930's, with the tradition possibly established due to the proximity of the cemetery to the suburbs where many Indians lived, such as Waltham, Central City, and Phillipstown (Pers. comms, Ashok Ganda, September 2021).

The cemetery has a long continued history of use and was still open in 2021.

¹ "The Burial Problem," *Lyttelton Times*, vol. CXVII, issue 17954, 22 November 1918, page 5.
<https://paperspast.natlib.govt.nz/newspapers/LT19181122.2.48>

² Sunnyside death & discharge registers, 1896, 1897, 1900, 1903, 1906, 1909, 1912. Note –registers post 1916 had restricted access. Archives New Zealand.

CULTURAL AND SPIRITUAL SIGNIFICANCE

Cultural and spiritual values that demonstrate or are associated with the distinctive characteristics of a way of life, philosophy, tradition, religion, or other belief, including: the symbolic or commemorative value of the place; significance to Tangata Whenua; and/or associations with an identifiable group and esteemed by this group for its cultural values.

Sydenham Public Cemetery has high cultural and spiritual significance as a place reflecting community attitudes toward death and remembrance, and as a formally designated resting place for many of the community's dead. Many of the graves and memorials are still active sites of tribute used by the family members and descendants of those buried there, situated within a setting of respect and contemplation.

The cemetery reflects a range of belief systems associated with life and death. The division of the cemetery into plots according to Christian religious denomination reflects both the religious persuasions of the population of southern Christchurch in the late 19th and early 20th centuries, and the importance placed on burial within a properly designated space of co-religionists, separate from those of other persuasions. The southernmost rows, which tended to be filled later in the 20th century, are no longer marked on the cemetery plan as being separated by religion, perhaps reflecting changing attitudes towards the importance of such a distinction. Non-Christian graves, including Muslim and Hindu, are also present within the cemetery, reflecting the religious diversity present within a nominally Christian community.

The historic presence of a mortuary chapel in the cemetery demonstrated the historical importance of Christian worship associated with cemeteries, its fall into disrepair, demolition, and subsequent lack of replacement reflects changing attitudes towards such practices. The demolition of the sexton's house to make room for a dedicated ashes plots in the early 21st century shows both changing expectations towards cemetery upkeep, and a growing acceptance and use of cremation as an alternative to burial.

Many of the grave markers are rich in symbolism and meaning, displaying motifs signifying attitudes to both life and death. Some repeated motifs include holding hands signifying a farewell, broken columns signifying mortality, draped urns signifying the veil between life and death, and overtly religious iconography such as the cross of Jesus. The square and compass, representing membership of the Freemasons, is present on some graves. The graves of those who served in the Armed Forces are often marked with service symbols.

The significant variety in size and embellishment of graves and the presence of many graves without extant markers show the social realities of class and wealth disparity in late 19th and early 20th century society. Many areas within the cemetery were set aside for 'Free' burial, marking a separation between those who could afford to pay for a burial plot and those who could not. These areas also contain a disproportionate number of unmarked graves, suggesting that those who could not afford a plot were also unlikely to afford a stone grave marker. Most Sunnyside patients buried in the early decades of the cemetery's operation are within these areas.

ARCHITECTURAL AND AESTHETIC SIGNIFICANCE

Architectural and aesthetic values that demonstrate or are associated with: a particular style, period or designer, design values, form, scale, colour, texture and material of the place.

Sydenham Public Cemetery has architectural and aesthetic significance for both the design of its layout which reflects Victorian cemetery design and the variety of visual elements present in the grave markers.

The layout of the cemetery is comparable to Christchurch's Addington Cemetery. The trees and smaller plants in the cemetery combine with the headstones, paths and grassed areas to a variety of form, scale, design, colour, texture and material of the landscape. The cemetery evokes a strong sense of age and history in the patina of its older monuments. The aesthetic significance of the cemetery is particularly enhanced by the graves that employ symbolic motifs.

The cemetery reflects Victorian cemetery design by the way it is characterised by a formal grid layout with closely spaced rows of graves. It is also characterised by large open grassed areas in which are

unmarked grave plots, perimeter tree planting, and informal tree planting within the burial area. Given the premium placed on land within a growing city, the orderly grid layout reflects a desire to use space efficiently as well as Victorian cemetery design.

The cemetery is rectangular in shape, with a small additional area of graves extending at the south-western corner. A metalled pathway leads from the entrance through the centre of the cemetery to a roughly oval shaped area which was the location of the mortuary chapel, and then on through to Somerfield Park. The central path through the cemetery to the park has long been a prominent feature and is evident on aerials photographs from the 1940s. A secondary metalled pathway leads from the entrance in a squared loop around the western side of the cemetery. A pathway extends northeast from the entrance along the northern border of the cemetery, and a grassy pathway also extends northeast from the central oval area.

The entrance to the cemetery was originally approached along a tree-lined driveway off Milton Street, however this was replaced when Simeon Street was extended south to meet the entrance. The entrance features decorative iron gates, ironwork and masonry pillars.

A small weatherboard public shelter with a hipped roof, closed in on three sides was erected to the left of the entranceway in 1908. After the demolition of the sexton's house in 2000, this was moved to the right of the entranceway, in front of the newly designated ash plots. At this time it was reoriented and one side was removed. The ashes plot contains an area in which plots are laid out in a 'swirl' design, in which four arms branch out in a radial pattern.

Boundary trees have been a landscape feature since at least the 1940s. A line of mature trees along the southern edge of the cemetery serves both to separate the cemetery from neighbouring residences and Somerfield Park and provide a visual border when looking out across the cemetery. Trees also line the eastern and western borders of the cemetery. Some tree removal has occurred as residential development in the surrounding area has been undertaken.

Several mature trees, which appear to be self-seeded, have arisen amongst the graves from the 1960s. Some of these are causing damage to grave markers. Some plots contain deliberately planted shrubs, or flowers such as daffodils.

Sydenham Cemetery also has aesthetic significance its funerary art. The variety of grave marker designs represent changing tastes and trends in markers over the course of the cemetery's existence. Many of the graves are sculptural with design values. The large variety of designs increases the overall visual interest of the cemetery space and creates a notable contrast between older and more modern forms of grave marker. Several grassy areas are notable for containing fewer grave markers, including a particularly large area in the eastern part of the cemetery. These areas correspond with areas marked 'free' on the cemetery plans and contain the graves of many who could not afford a plot or a marker.

TECHNOLOGICAL AND CRAFTSMANSHIP SIGNIFICANCE

Technological and craftsmanship values that demonstrate or are associated with: the nature and use of materials, finishes and/or technological or constructional methods which were innovative, or of notable quality for the period.

Sydenham Public Cemetery has technological and craftsmanship significance for the methods and materials used in the creation of its grave memorials. The technical accomplishment of Christchurch stonemasons is on display in the variety of stone grave markers. The methods and materials used in the creation of graves are representative of the periods in which they were erected, and often evidence past techniques which are no longer used, such as the use of wrought-iron grave surrounds.

Materials used in the construction of grave markers and surrounds include concrete, marble, and varieties of granite including red and black.

CONTEXTUAL SIGNIFICANCE

Contextual values that demonstrate or are associated with: a relationship to the environment (constructed and natural), a landscape, setting, group, precinct or streetscape; a degree of consistency in terms of type, scale, form, materials, texture, colour, style and/or detail; recognised

landmarks and landscape which are recognised and contribute to the unique identity of the environment.

Sydenham Public Cemetery has contextual significance as a historical open space and community landmark within the suburb of Somerfield, and for its similarities with Addington Cemetery.

The setting of the cemetery consists of the immediate land parcel. Beyond the immediate setting, the adjacent reserve relates to the cemetery in terms of its passive recreation use, and there is a prominent pathway linking the reserve to the cemetery, which is evident from historical aerials photographs dating to the 1940s (Canterbury Maps). The open space of the cemetery provides views to the Port Hills.

As the cemetery does not directly border a road, its relatively narrow entranceway at the southern terminus of Simeon Street belies its large size, which is more apparent along its border with the northern edge of Somerfield Park. The size and scale of the cemetery provides a significant contrast to its residential surroundings and the site is well used as a walking and recreation space by the local community.

The cemetery also has contextual significance in relation to other historic cemeteries in Christchurch, particularly Addington Cemetery, which is of a similar design.

ARCHAEOLOGICAL AND SCIENTIFIC SIGNIFICANCE

Archaeological or scientific values that demonstrate or are associated with: the potential to provide information through physical or scientific evidence an understanding about social historical, cultural, spiritual, technological or other values of past events, activities, structures or people.

The cemetery and setting are of archaeological significance because they have potential to provide archaeological evidence relating to past human activity on the site prior to 1900. The first burials in the cemetery were performed in 1896. To the southeast is the Ōpāwaho (Heathcote) river, which was an important kāinga mahinga kai (food-gathering place) for local Māori, as well as a part of an interconnected network of ara tawhito (traditional travel routes).

ASSESSMENT STATEMENT

Sydenham Public Cemetery is of high overall significance to the Christchurch district, including Banks Peninsula.

The cemetery is of high historical and social significance as the second oldest municipal cemetery in the city, for its long history of continual use across cultures and social classes, and its historical connections to the 1918 flu pandemic, the Sunnyside Lunatic Asylum, and the Indian community of Christchurch. The cemetery is of high cultural and spiritual significance as an expression of beliefs surrounding death and commemoration from the late Victorian period to the present day. The cemetery is of architectural and aesthetic significance for its formal grid layout, variety of grave styles and visual motifs, and landscape design elements. The cemetery is of technological and craftsmanship significance for the methods and materials used in the construction of grave markers. Sydenham Public Cemetery has contextual significance as a historical open space and community landmark within the suburb of Somerfield, and for its similarities with Addington Cemetery. The cemetery is of archaeological significance due the presence of known human activity prior to 1900, including human burials from 1896 and Māori food-gathering at the nearby Ōpāwaho River.

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REPORT DATED: 5 NOVEMBER OCTOBER 2021

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**CHRISTCHURCH DISTRICT PLAN – SCHEDULED HERITAGE PLACE
HERITAGE ASSESSMENT – STATEMENT OF SIGNIFICANCE
HERITAGE ITEM NUMBER 1400
FRENCH CEMETERY - 7 RUE POMPALLIER, AKAROA**



PHOTOGRAPH: CHRISTCHURCH CITY COUNCIL 2009

HISTORICAL AND SOCIAL SIGNIFICANCE

Historical and social values that demonstrate or are associated with: a particular person, group, organisation, institution, event, phase or activity; the continuity and/or change of a phase or activity; social, historical, traditional, economic, political or other patterns.

The French Cemetery is of high historical and social significance as the first consecrated European cemetery in the South Island and for its connection with the Catholic and French settler history of Akaroa.

Following the arrival of the French settlers in Akaroa in 1840, land was allocated to the Catholic Mission for a church and cemetery. The Cimetière Catholique was consecrated by Bishop Pompallier in the first years of the town's settlement and as such was the first consecrated cemetery in the South Island. The French Cemetery, as it came to be known, was located on the elevated prospect of Lelievre's Hill (renamed L'Aube Hill), in close association with the priest's house and the settlement's first Catholic church (Chapel of St James and St Philip). It is unclear when the cemetery grounds were set-out or planted but the first burial is understood to have taken place in May 1842 and by August of 1843 it was described as having been 'constructed'. It is not known how many burials took place in the cemetery over the 40 years it was open for interments. A sketch of the cemetery dated to 1850 suggests up to 14 graves were located in two sections within the cemetery boundaries by that time, and 18 names are recorded on the monument plaque. Up to 50 people may have been interred and the last burial probably occurred in 1880. The cemetery is now closed.

From an early date, the cemetery was valued for its historical value and connection with the town's early French residents. Early descriptions of the cemetery landscape indicate that it was originally hedged with gorse, ornamented with willows, roses and Ranunculus, and pre-existing native vegetation, including totara. It also contained wooden crosses, chain fences and simply formed wooden headboards with short

epitaphs. The French settlers in Akaroa practised an ongoing ritual of cultivating willows (purportedly sourced from the grave of Napoléon on the island of St Helena) to stand as memorial trees in the cemetery, including one planted in 1939 associated with the Le Lievre family. A number of commemorative tree plantings have also occurred in the cemetery over time; including the royal coronations in 1911 (George V) and 1937 (George VI), Arbor Day and Girl Guiding.

The cemetery was the first in Akaroa and therefore would have had both French and English burials until the Akaroa Anglican Cemetery and Akaroa Dissenters Cemetery were opened at the opposite end of the Akaroa settlement in the 1850s and 60s. Of those listed on the memorial some are women who died in childbirth including Madame Libeau, one of 12 married women who journeyed from France. She gave birth to her third child at sea, but died, aged 42, after giving birth to her ninth child. The original grave markers that survive memorialise two French sailors who died in Akaroa. Captain Le Lievre died of "vegetable colic" a mysterious ailment afflicting the French, now thought to be a form of poisoning because their casks of Normandy cider were bound with lead. Burials were not limited to Catholics; Mrs Watkins Senr, a Protestant, is recorded as having been buried there.

From as early as the 1870s, when a new Catholic cemetery was established adjacent to the Anglican Cemetery reserve, the French Cemetery was decommissioned. After this, the upkeep of the graves became an issue and by the turn of the century the cemetery had become neglected and inscriptions and markers were lost, moved or removed. This was an issue until the 1920s, when the Department of Internal Affairs took an interest and provided financial support, and the Akaroa Borough Council took over control of the cemetery from the Church (24 March 1921). In 1924 the Department provided financial support (ninety pounds) to the council for works to the cemetery and the erection of a memorial bearing the names of those known to be buried in the cemetery.

The works involved an intensive reworking of the cemetery. All existing plant fabric and remnant grave material was cleared from the grounds for a new landscape of concrete and carpet bedding. Bodies were exhumed and reburied in a central plot and two coffin inscription plates were salvaged and included as memorial fabric mounted on a central burial feature. A wall was erected around the burial ground and a central memorial with a plaque recorded the names of the interred. The grounds were laid out by the Council gardener in 1925/26 and trees were provided by the Department of Internal Affairs. The site was renamed the Old French Burial Ground. The unveiling ceremony formed a key part of the Akaroa Borough's fiftieth jubilee celebrations on 25 September 1926 with the Hon. J. G. Anderson, Minister of Marine, presiding. Descriptions of this new landscape were not all favourable: "the dear old cemetery had been raked bare and clean and tidy" wrote one critic. Pines were said to have been planted with military precision and the surrounding fence was a 'severe' iron railing. An annual grant of ten pounds per annum to the Akaroa Borough Council was instituted on 1 April 1928. The cemetery is owned by the Roman Catholic Diocese and the Ministry of Culture and Heritage look after the structures and pay the Council a grant towards maintenance.

CULTURAL AND SPIRITUAL SIGNIFICANCE

Cultural and spiritual values that demonstrate or are associated with the distinctive characteristics of a way of life, philosophy, tradition, religion, or other belief, including: the symbolic or commemorative value of the place; significance to Tangata Whenua; and/or associations with an identifiable group and esteemed by this group for its cultural values.

The French Cemetery is of high cultural and spiritual significance because its burials encompass religious, spiritual, traditional, commemorative and cultural aspects and it is valued by the Christchurch and Banks Peninsula communities for all of these reasons.

The cemetery is associated with the French settlement of Akaroa, as well as with commemorative events relating to Catholicism in Akaroa and the South Island (e.g. Catholic centennial ceremony, 1940; 1990 restoration for sesquicentennial of Akaroa).

The esteem in which the place is held by the community is evidenced by its history of community interest in its maintenance and condition, and efforts to care for and restore it over time. The ongoing role of the Ministry of Cultural and Heritage in its care evidences a national level of esteem and commemorative value for the cemetery.

ARCHITECTURAL AND AESTHETIC SIGNIFICANCE

Architectural and aesthetic values that demonstrate or are associated with: a particular style, period or designer, design values, form, scale, colour, texture and material of the place.

The French Cemetery has architectural and aesthetic significance for its layout, monument, plaques and plantings.

The layout of the original cemetery is no longer visible and there are no remaining headstones as they were removed in the 1926 clean-up of the cemetery.

The 1926 wall, railings, monument and plaques have a simplicity in their design which accords with a modern 1920s aesthetic. Construction is concrete for the low walls and monument with metal railings and black granite plaques. The concrete posts of the wall and the central monument are square with pyramidal tops.

Originally the cemetery provided good views down to the township and the waterfront, which is very different to the enclosed feeling the cemetery has today surrounded by established trees and dense shrub vegetation. This enclosed feeling contributes to the current aesthetic and sense of place of the cemetery.

TECHNOLOGICAL AND CRAFTSMANSHIP SIGNIFICANCE

Technological and craftsmanship values that demonstrate or are associated with: the nature and use of materials, finishes and/or technological or constructional methods which were innovative, or of notable quality for the period.

The French Cemetery is of technological and craftsmanship significance for the materials and craftsmanship of its structures, which are representative of their period.

Sylvester and Co completed the work in 1926. One historic bronze plaque remains and is inserted in the wall (Edouard Le Lievre, May 1842). Granite plaques on the memorial and the wall are finely engraved.

CONTEXTUAL SIGNIFICANCE

Contextual values that demonstrate or are associated with: a relationship to the environment (constructed and natural), a landscape, setting, group, precinct or streetscape; a degree of consistency in terms of type, scale, form, materials, texture, colour, style and/or detail; recognised landmarks and landscape which are recognised and contribute to the unique identity of the environment.

The French Cemetery is of contextual significance for its relationship to the Akaroa township and the L'Aube Hill Reserve, and the background of mature trees which surround the memorial structures and create a feeling of enclosure. The reserve in which it is located provides a backdrop to Akaroa, and in particular Rue Lavaud.

The cemetery is located on the hill to the south east of St Patrick's Catholic Church

ARCHAEOLOGICAL AND SCIENTIFIC SIGNIFICANCE

Archaeological or scientific values that demonstrate or are associated with: the potential to provide information through physical or scientific evidence and understanding about social historical, cultural, spiritual, technological or other values of past events, activities, structures or people.

The French Cemetery is of archaeological and scientific significance because it has potential to provide archaeological evidence relating to past human activity on the site including that which dates prior to 1900, and which relates to French and Catholic burial practices.

Akaroa harbour is of interest to Ōnuku Rūnanga as a mahinga kai and is the location of a Ngāti Māmoe urupa at 25 Rue Lavaud, Akaroa (St Patrick's Church).

ASSESSMENT STATEMENT

The French Cemetery is of high significance to the Christchurch District. The French Cemetery is of high historical and social significance as the first consecrated European cemetery in the South Island and for its connection with the Catholic and French settler history of Akaroa. The French Cemetery is of high cultural and spiritual significance for the high esteem in which it is held by the community and because of religious, spiritual, traditional, commemorative and cultural aspects its burials encompass. The French Cemetery has architectural and aesthetic significance for its layout, monument, plaques and plantings and is of technological and craftsmanship significance for the materials and craftsmanship of its structures, which are representative of their period. The French Cemetery is of contextual significance for its relationship to the Akaroa township and the L'Aube Hill Reserve; the background of mature trees which surround the memorial structures and create a feeling of enclosure. The French Cemetery is of archaeological and scientific significance because it has potential to provide archaeological evidence relating to past human activity on the site including that which dates prior to 1900, and which relates to French and Catholic burial practices.

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REPORT DATED: 27 September 2021

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**CHRISTCHURCH DISTRICT PLAN – SCHEDULED HERITAGE PLACE
HERITAGE ASSESSMENT – STATEMENT OF SIGNIFICANCE
HERITAGE ITEM NUMBER 1444
*SOMERFIELD WAR MEMORIAL COMMUNITY CENTRE/
SOMERFIELD COMMUNITY CENTRE AND SETTING -
47 STUDHOLME STREET, CHRISTCHURCH***



PHOTOGRAPH: A OHS, 12.2.2021

HISTORICAL AND SOCIAL SIGNIFICANCE

Historical and social values that demonstrate or are associated with: a particular person, group, organisation, institution, event, phase or activity; the continuity and/or change of a phase or activity; social, historical, traditional, economic, political or other patterns.

The Somerfield Community Centre has historical and social significance as a community World War Two (WWII) memorial – supported by the ‘*Living Memorial*’ subsidy scheme, and for its long term use as a community facility for a variety of activities.

By the early 1910s the south-eastern part of Spreydon district had established its own identity as the suburb of Somerfield. Somerfield had been a farm in the vicinity, which was subdivided in the mid 1890s. Studholme Street dates from 1906/7. Newspapers indicate the existence of an earlier Somerfield Hall (variously called the Beckenham Hall, the Somerfield Hall and the Somerfield Street Hall) on the corner of Colombo, Strickland and Somerfield Streets which was used for social events from 1913-1933. In 1933 the Somerfield Burgesses Association (SBA) was formed to promote the interests of the growing community. The following year it was instrumental in the purchase by the Christchurch City Council (CCC) of Somerfield Park in Studholme Street; the park opened in 1935.

A decade later the SBA undertook to provide their growing suburb with a much-needed hall complex. The Association purchased a section in Studholme Street adjacent to Somerfield Park in the 1940s, and agreement reached with the CCC that they would take over the facility upon completion. CCC also agreed to provide timber for construction. Plans were drafted by architect Clifford Wells. In July 1948 the plans were submitted to the Department of Internal

Affairs (DIA) with a request for a government subsidy under the Physical Welfare and Recreation Act (1937).

In late 1946 the government established pound for pound subsidy scheme to match community-raised donations for 'Living Memorials' - useful community facilities that also served as war memorials. The SBA were told that more money than that requested would be available if the Association designated their hall Somerfield's official District War Memorial, which they did in July 1949. The DIA approved in principle the sum of £3,500. In August 1951, soon after the Centre had been completed, the CCC (as new owner) lodged a claim for £4,022/4/9. Although the subsidy claim was £500 in excess of the original estimate, it was granted and an additional £85 was also later granted for landscaping. Across metropolitan Christchurch, a further four community centre projects (North New Brighton, Mt Pleasant, Diamond Harbour and Yaldhurst) and one sports pavilion (Rawhiti Domain) also received war memorial subsidies. The Somerfield Community Centre is one of 320 memorial facilities across the country that were approved for the subsidy.

There is a long history of the collective experience of many New Zealanders taking place in local halls, and this continues today. The role of the Somerfield hall as a local hub was supported by its primary use by a local kindergarten. The kindergarten, later operating as a play centre, was the major user of the hall until the mid-1990s. Although no longer located in the community centre building, this childcare facility remains on-site today. Somerfield Primary School, which is located across the road, has also been a frequent user through the years.

Community interest in the centre revived in the early 1990s and a new group of local residents stepped in to run the facility. In addition to the Play Centre and the local primary school, other regular users in recent decades have included indoor bowls, the Olympic Harriers Club and exercise and dance classes.

CULTURAL AND SPIRITUAL SIGNIFICANCE

Cultural and spiritual values that demonstrate or are associated with the distinctive characteristics of a way of life, philosophy, tradition, religion, or other belief, including: the symbolic or commemorative value of the place; significance to Tangata Whenua; and/or associations with an identifiable group and esteemed by this group for its cultural values.

The Somerfield War Memorial Community Centre has cultural and spiritual significance as Somerfield's dedicated World War II memorial.

In order to receive the government's war memorial community centre subsidy, a hall had to be designated the official WWII war memorial for the district. The whole hall is a war memorial and the Somerfield Burgesses Association also had a bronze Roll of Honour (complete with lighting) installed on the street frontage of the community centre.

ARCHITECTURAL AND AESTHETIC SIGNIFICANCE

Architectural and aesthetic values that demonstrate or are associated with: a particular style, period or designer, design values, form, scale, colour, texture and material of the place.

The Somerfield Community Centre is architecturally and aesthetically significant as a work of prominent mid-century Canterbury architect Clifford Wells, for its design which strongly responds to the residential suburban context, and as an example of the variety of styles of halls built under the government's war memorial subsidy scheme.

One of the conditions of the war memorial subsidy scheme was that hall plans had to be approved in advance by the Internal Affairs Department. Some of the plans received by the department were drawn by professional architects, but many were just sketches conceived by locals; either way most plans were eventually approved. Consequently, the memorial halls came in a wide variety of designs traversing most of the mid- 20th century's architectural styles, from humble timber or tin buildings that would not have looked out of place in Edwardian New Zealand, to local variants of Art Deco, Moderne and Modernism.

When the SBA applied for a war memorial subsidy in July 1949, planning for the Somerfield Community Centre was already well-advanced. Before confirmation that it had been successful a tender for construction had been accepted, from Wiseman Construction for £6088. There was then a delay while the plans were modified¹ in consultation with the Ministry of Works, the subsidy was approved in November 1949, and a revised contract was signed with Wiseman. Construction commenced in early 1950 under CCC supervision, and the community centre was completed in May 1951. Just three years later, the building's rear veranda was enclosed to provide additional space for the kindergarten.

Clifford Burnard Wells (1914-2003) initially studied architecture in Christchurch before travelling to London in the mid-1930s to complete his training. After a period with W H Trengrove, he commenced practice on his own account in 1944. Between 1970 and his retirement in 1989, Wells operated in partnership with his son. Wells designed many churches across Canterbury and Westland during the 1950s and '60s. He was also a busy commercial architect; the former Miller's Clothing Factory in Wairakei Road was one of his notable designs.

The plan - with its rear entry vestibule, first floor meeting room and wingless stage - responds to the narrowness of the site and the need to integrate a kindergarten. Despite the building's overall size, from the street it has a domestic character which allows the centre to blend with its suburban environment. The low eaves, red brick walls, large steel-frame windows, Moderne-influenced portholes, board and batten gables, and the absence of a front entry, are all features which suggest a post-war dwelling. This is reinforced by a street-front set-back, tidy front garden and low brick wall.

From the 1970s, the Somerfield Community Centre entered a period of relative neglect. In 1987 a council survey identified significant damage to the lathe and plaster wall and ceiling linings in the hall due to water ingress, and these were subsequently replaced. The following year, a further council report recommended an extensive programme of repair and maintenance. In 1996 the Play Centre moved into a new stand-alone building on site and the former kindergarten space was adapted to become a dedicated supper room – a feature which the centre had lacked until this point. In early 2010 the problematic concrete tile roof was replaced with corrugated steel. After the Canterbury Earthquakes, despite the absence of significant damage the hall was determined to be earthquake prone. Temporary buttresses were installed to allow the centre to continue to function; these remain in place.

The whole interior contributes to the significance of the heritage item because of its form and materials, and the large extent of heritage fabric that remains throughout. Interior features include the layout and spaces, structure and linings, fixtures, hardware, materials and finishes. These are highly intact and reflect the period in which the hall was constructed, and its history of use.

The hall space features a timber floor and panelling, steel-frame windows with hardware, and a coved ceiling. The stage, backstage spaces, the servery hatch, and a projection booth remain. Timber doors and hardware remain throughout, including signage on the toilet doors. Original timber kitchen cabinetry and hardware remain.

The Roll of Honour includes the rank of the servicemen – this was not common practice.

TECHNOLOGICAL AND CRAFTSMANSHIP SIGNIFICANCE

Technological and craftsmanship values that demonstrate or are associated with: the nature and use of materials, finishes and/or technological or constructional methods which were innovative, or of notable quality for the period.

The Somerfield Community Centre has technological and craftsmanship significance for its material and finishes which are of a good quality and characteristic of the period.

¹ The Department of Internal Affairs considered the width and height of the stage inadequate, that there were unspecified structural defects, no dressing rooms, and a cramped vestibule. Council had approved the plans. Archives New Zealand, Somerfield 174/439.

The building features brickwork, metal-framed windows, a bronze roll of honour, and timber flooring and panelling. The timber floor in the hall is in particularly good condition. Timber panels on the exterior feature scalloped edges. There are two porthole windows with brick surrounds.

CONTEXTUAL SIGNIFICANCE

Contextual values that demonstrate or are associated with: a relationship to the environment (constructed and natural), a landscape, setting, group, precinct or streetscape; a degree of consistency in terms of type, scale, form, materials, texture, colour, style and/or detail; recognised landmarks and landscape which are recognised and contribute to the unique identity of the environment.

The Somerfield Community Centre and setting have contextual significance in relation to their site, setting and wider suburban Christchurch context.

The building sits on a long rectangular parcel the width of a standard suburban section of the period, with a childcare facility built to the north end of the parcel in 1996. There are houses in close proximity on either side. The setting includes an area of trees to the rear, a low brick wall to the street, and residential style garden plantings to the front. The setting excludes the childcare facility.

The hall closely relates to the established suburban residential character of Studholme Street in its garden setting, scale, siting, materials, detailing and forms. The context clearly influenced the planning and appearance of the community centre, which was designed to blend with its suburban environment. The centre also has a relationship with its wider context, as it is located in close proximity to both Somerfield Park (which it backs on to) and Somerfield Primary School.

ARCHAEOLOGICAL AND SCIENTIFIC SIGNIFICANCE

Archaeological or scientific values that demonstrate or are associated with: the potential to provide information through physical or scientific evidence and understanding about social historical, cultural, spiritual, technological or other values of past events, activities, structures or people.

The Somerfield Community Centre and setting are of archaeological significance because they have the potential to provide archaeological evidence relating to past human activity on the site including that which occurred prior to 1900. Prior to subdivision in 1903, Studholme Street was part of a rural property owned by the Studholme family.

SUMMARY ASSESSMENT

The Somerfield War Memorial Community Centre/Somerfield Community Centre and setting, including the whole interior, are of overall significance to the Christchurch district including Banks Peninsula.

The Somerfield Community Centre has historical and social significance as a community World War Two memorial – supported by the ‘Living Memorial’ subsidy scheme, and for its long term use as a community facility for a variety of activities. It is of cultural and spiritual significance as the suburb’s dedicated WWII memorial. The building is of architectural and aesthetic significance as a work of prominent mid-century Canterbury architect Clifford Wells, carefully designed and detailed to respond to its context, and as an example of the halls built under the government’s war memorial subsidy scheme. The Somerfield Community Centre is of technological and craftsmanship significance for the range of quality materials used in its construction and detailing. The building has contextual significance because of the way it relates to its suburban residential setting in terms of its garden, scale, siting, materials, detailing and forms. The Somerfield Community Centre and its setting are of archaeological significance because they have the potential to provide archaeological evidence relating to past human activity on the site including that which occurred prior to 1900.

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REPORT DATED: 27.9.2021

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**CHRISTCHURCH DISTRICT PLAN – SCHEDULED HERITAGE PLACE
HERITAGE ASSESSMENT – STATEMENT OF SIGNIFICANCE
HERITAGE ITEM NUMBER 1427
*BACH AND SETTING - 5 TAYLOR'S MISTAKE BAY,
SCARBOROUGH***



PHOTOGRAPH: G. WRIGHT, 9 FEBRUARY 2017

HISTORICAL AND SOCIAL SIGNIFICANCE

Historical and social values that demonstrate or are associated with: a particular person, group, organisation, institution, event, phase or activity; the continuity and/or change of a phase or activity; social, historical, traditional, economic, political or other patterns.

Bach 5 in Boulder Bay has historical and social significance as a reflection of changing patterns of recreation and leisure in early twentieth century New Zealand; for its association with different owners over time including local identity Dave Kingsland, and long-established bay family, the Roberts; and as part of the Taylor's Mistake bach community – well-known in Christchurch.

In late 1925 Randal Crowley applied for and was granted a hut site in Boulder Bay by the Sumner Borough Council.¹ Crowley secured a position as a fitter with the Christchurch Tramway Board from 1913, where he remained until his retirement in 1939. A number of Tramway Board employees maintained baches at Taylor's Mistake during the community's early years.

In December 1934 Randal transferred Bach 5 to his son from his first marriage, Athel Crowley. In August 1939 Athel applied for permission to sell Bach 5, but with the outbreak of World War II those plans appear to have been put on hold.

¹ Press 11/08/1925

After the war, the Crowleys passed² their bach to family member M. 'Lofty' Watson who then sold it to Charles 'Charlie' Greenland and his wife Edna in c1950. After about a decade, the Greenlands sold their bach to Dave Kingsland. Dave Kingsland was one of the well-known personalities of Taylor's Mistake and was one of the semi-permanent population who lived out at Boulder Bay during the depression years.

After the war, Kingsland began working for William 'Bill' Thoms' St Asaph Street glass and mirror business. Bill Thoms later purchased Bach 8 and married Dave's sister. After his retirement in 1963, Dave settled permanently back in his new bach in the bay and led a somewhat self-sufficient lifestyle. Dave left the bay in 1986 and gave his bach to acquaintance Gordon Thomas in 1987. Bach 5 was sold in the 1990s to Richard Roberts (also owner of Bach 1). Roberts passed it on to his brother Brian and friend Sidney 'Sid' Fergusson. The Roberts family continue to use the bach today.

CULTURAL AND SPIRITUAL SIGNIFICANCE

Cultural and spiritual values that demonstrate or are associated with the distinctive characteristics of a way of life, philosophy, tradition, religion, or other belief, including: the symbolic or commemorative value of the place; significance to Tangata Whenua; and/or associations with an identifiable group and esteemed by this group for its cultural values.

Bach 5 has cultural significance for the manner in which it signifies the informal do-it-yourself bach way of life of the early and mid-20th century and for the public esteem in which the area is held as evidenced by its frequent artistic representation. The bach way of life is held to represent values which are quintessentially 'kiwi' representing the New Zealand culture of 'do it yourself' and connecting with the natural environment. Bach 5 is valued by its owners, and has been in the same family for over 20 years. Kingsland's time at the bach demonstrates a particular way of life.

The public esteem for the wider Taylor's Mistake area has been regularly and consistently demonstrated by its representation in the visual media through the years as an archetypal bach community. In the middle decades of the 20th century, the bay was an accessible subject for the 'Canterbury School' of regionalist painters. The most well-known of these paintings is Bill Sutton's *Untitled (Taylor's Mistake)* of the late 1940s. The bay has also been depicted by Francis Shurrock, Rosa Sawtell, Doris Lusk, and Cecil and Elizabeth Kelly. Since the 1980s, nostalgia for and celebration of the traditional bach way of life has seen Taylor's Mistake baches frequently depicted in picture books and other popular media. This exposure has contributed to Taylor's Mistake becoming one of New Zealand's better-known and most iconic beach settlements.

ARCHITECTURAL AND AESTHETIC SIGNIFICANCE

Architectural and aesthetic values that demonstrate or are associated with: a particular style, period or designer, design values, form, scale, colour, texture and material of the place.

Bach 5 has architectural and aesthetic significance as an example of what is now considered a distinctive type of New Zealand architecture, the small vernacular dwellings that were typically built to serve as baches across New Zealand in the early decades of the 20th century.

Such dwellings were usually owner built and designed without formal plans (or planning), constructed of locally-sourced, affordable or found materials, and often later altered and adapted to suit owners' needs as required. Bach design was usually individual and particular to the site, with design and style reflecting the notions, needs and means of their owners. Many of the first generation of baches were formed from shore-line caves. The remote location of many Taylor's Mistake baches - where most materials had to be carried or boated in - encouraged the use of lightweight materials and whatever was immediately to hand. By mid-century, baches were usually more substantial structures, built of commercial materials such as fibre cement cladding (Fibrolite/Polite), possibly as a result of changing building code requirements. Although they were more akin to permanent dwellings, these baches resembled their predecessors in so far as they were usually designed by their owners and

² No record of a sale or change of ownership has been found.

generally did not follow typical domestic models. Built for an informal lifestyle, they tended to adhere more to a mid-century art deco or modernist-derived aesthetic, with features such as mono-pitch roofs, open-plan layouts and indoor-outdoor flow.

Bach 5 reflects the typology and characteristics of the 'kiwi' bach in its simple forms and material. Bach 5 is a gabled hut form, built from poured concrete and then stuccoed on the exterior. Concrete construction was unusual at Taylor's Mistake and Boulder Bay at the time when most baches were timber. Boulder Bay later became particularly notable for its stone and concrete baches. Baches 9, 31 and elements of 32 were built in a similar fashion in later decades. Windows are small and simple and framed in timber. The compact interior consists of two principal rooms (living and bedroom) and a store room entered through a separate door. Original joinery remains. The bach has been little altered in the century since construction and retains a high degree of integrity and authenticity.

TECHNOLOGICAL AND CRAFTSMANSHIP SIGNIFICANCE

Technological and craftsmanship values that demonstrate or are associated with: the nature and use of materials, finishes and/or technological or constructional methods which were innovative, or of notable quality for the period.

Bach 5 has technological and craftsmanship significance as a vernacular building in poured concrete. The employment of concrete in this remote context is unusual as it is a labour-intensive method of construction that required the transport to the bay of materials from outside the area. At this time it was normally used for domestic buildings in residential areas. The novelty of the material is highlighted by the fact that most baches at Taylor's Mistake in this period were timber-fronted caves or lightly-framed board and batten-clad huts. The bach can be understood however as a response to place given gravel for the concrete was readily available from the beach, which was not the case elsewhere at Taylor's Mistake. This is also reflected in the employment of boulders in the construction of Baches 1 and 2, and concrete for Bach 9.

CONTEXTUAL SIGNIFICANCE

Contextual values that demonstrate or are associated with: a relationship to the environment (constructed and natural), a landscape, setting, group, precinct or streetscape; a degree of consistency in terms of type, scale, form, materials, texture, colour, style and/or detail; recognised landmarks and landscape which are recognised and contribute to the unique identity of the environment.

Bach 5 has contextual significance on its site and within its setting. The contextual significance of the bach is derived partly from its location in the coastal landscape, and partly from its association with the neighbouring baches of Boulder Bay - similarly small scale and informally-built dwellings forming an isolated and distinctive settlement within the larger Taylor's Mistake area. Bach 5 is located on the beachfront in the midst of the small sheltered sweep of Boulder Bay. A small shed/boathouse is located to the north. The bach overlooks the stony beach, and across to Whitewash Head, Christchurch and the Southern Alps.

The baches in Boulder Bay are located close to the shore along the small bay characterised by rocky boulders. They are commonly single storey, small, with simple forms and low gabled roofs clad in with corrugated iron. Many have chimneys. Walls are clad in Fibrolite or with boulders, or plastered concrete. The baches are characteristically painted light colours for walls, such as greens, blue and red. Window forms are small and simple, with timber framing, and glazed doors are common.

Bach 5 relates strongly to this group in terms of its design, form, materials and location and is a key contributor to the group. The group of baches of Boulder Bay are a well-known landmark in Christchurch as they are a prominent feature of the bay and its popular coastal walk.

ARCHAEOLOGICAL AND SCIENTIFIC SIGNIFICANCE

Archaeological or scientific values that demonstrate or are associated with: the potential to provide information through physical or scientific evidence an understanding about social

historical, cultural, spiritual, technological or other values of past events, activities, structures or people.

Bach 5 and its setting are of archaeological significance because they have the potential to provide archaeological evidence relating to past building construction methods and materials, and human activity on the site. There was no known Māori settlement at Taylor's Mistake (Te Onepoto/short beach), but it is likely to have been employed in mahinga kai (food gathering). Baches were developed in the area from the turn of the 19th century.

ASSESSMENT STATEMENT

Bach 5 and its setting are of overall heritage significance to Christchurch, including Banks Peninsula. The bach has historical and social significance as a reflection of changing patterns of recreation and leisure in early 20th century New Zealand, for its association with different owners over time including local identity Dave Kingsland, and long-established bay family, the Roberts; and as part of the well-known Taylor's Mistake bach community. It has cultural significance for the manner in which it signifies the informal do-it-yourself bach way of life of the early and mid-20th century and for the public esteem in which the area is held as evidenced by its frequent artistic representation. The building has architectural and aesthetic significance as a notably intact example which typifies bach design of the early decades of the 20th century. The bach has technological and craftsmanship significance as a vernacular building in poured concrete. It has contextual significance on its site and within its setting, for its relationship to the landscape and bay, and for its shared physical characteristics with the landmark group of baches, of which it is a key contributor. Bach 5 and its setting are of archaeological significance because they have the potential to provide archaeological evidence relating to past building construction methods and materials, and human activity on the site.

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REPORT DATED: 14 OCTOBER 2021

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**CHRISTCHURCH DISTRICT PLAN – SCHEDULED HERITAGE PLACE
HERITAGE ASSESSMENT – STATEMENT OF SIGNIFICANCE
HERITAGE ITEM NUMBER 1426
*BACH AND SETTING - 7 TAYLOR'S MISTAKE BAY,
SCARBOROUGH***



PHOTOGRAPH: G. WRIGHT, 9 FEBRUARY 2017

HISTORICAL AND SOCIAL SIGNIFICANCE

Historical and social values that demonstrate or are associated with: a particular person, group, organisation, institution, event, phase or activity; the continuity and/or change of a phase or activity; social, historical, traditional, economic, political or other patterns.

Bach 7 in Boulder Bay has historical and social significance as a reflection of changing patterns of recreation and leisure in early 20th century New Zealand; for its associations with well-known early 20th century historian and cultural figure Johannes Andersen, lighthouse keeper Hughie Yardley, market gardener Bill Matthams, fireman Murray Jamieson, and as part of the Taylor's Mistake bach community – well-known in Christchurch.

Bach 7 - the first at Boulder Bay – is likely to have been built by Johannes Carl Andersen in c.1914. The Danish-born Andersen arrived in Christchurch in 1874. He served as a clerk with the Lands and Survey Department in the city from 1887 until 1915 when he became an assistant at the General Assembly Library in Wellington. In 1919 Andersen was appointed first librarian at the Alexander Turnbull Library, in which capacity he served until retirement in 1937. As a poet, ethnologist, librarian and historian, Andersen was a prominent cultural figure in early 20th century New Zealand. A prolific writer, he edited scientific journals and published more than thirty books on a wide variety of topics – most notably on Māori culture and New Zealand birds.

On leaving Christchurch in 1915, Andersen sold his bach to Hughie Yardley. Hugh Yardley (1883-1949) grew up in Richmond and served in World War I. In 1918 he returned to Christchurch after suffering a severe head wound. On his return Yardley resumed work as a driver. Yardley's association with Taylor's Mistake began in the early 1900s when he started

visiting the area for holidays. He joined the Taylor's Mistake Life Saving Club soon after its foundation in 1916. In c1927 Yardley built himself a new bach – *Stone End* (now Bach 1) and moved to Boulder Bay on a permanent basis. He also secured a position at the Godley Head Lighthouse as emergency man and fog signaller. He resided at *Stone End* until his death at the age of 66 in 1949.

When Yardley built *Stone End*, Bach 7 was bought by former land broker Alfred Allard and his wife Iris. Following the Allard family, Bach 7 was owned during the late 1930s and 1940s by Francis and Ada Pope, and then by Frederick and Julia Black. By the late 1940s it was in the possession of William (Bill) Matthams and his wife Cecilia. Bill Served in World War 2 and after the war he opened a green grocers at the corner of Colombo and Brougham Streets where he sold early spring daffodils from the bay. In 1969, Bill and Cis sold their bach to fireman Murray Jamieson. The bach has remained in the ownership of the Jamieson family for 50 years, and the family still holiday at Boulder Bay in Bach 7.

CULTURAL AND SPIRITUAL SIGNIFICANCE

Cultural and spiritual values that demonstrate or are associated with the distinctive characteristics of a way of life, philosophy, tradition, religion, or other belief, including: the symbolic or commemorative value of the place; significance to Tangata Whenua; and/or associations with an identifiable group and esteemed by this group for its cultural values.

Bach 7 has cultural significance for the manner in which it signifies the informal do-it-yourself bach way of life of the early and mid-20th century, for the generational family ownership which is part of its history and for the public esteem in which the area is held as evidenced by its frequent artistic representation. The bach way of life is held to represent values which are quintessentially 'kiwi' representing the New Zealand culture of 'do it yourself' and connecting with the natural environment.

The current owners of the bach, the Jamieson family, value their bach highly and have looked after it for the last 50 years. The longevity of family ownership displayed with this bach is also a cultural characteristic of several of the other baches in the wider Taylor's Mistake group and more especially of Boulder Bay. In Boulder Bay the shortest amount of time a bach has been owned by one of the current families is 20 years or so, and the majority of the baches have been with their current families for between 50 and 80 years.

One particular aspect of the kiwi bach way of life represented by many of the Taylor's Mistake baches (including Bach 4) is a frequent connection with surf lifesaving. The Taylor's Mistake Surf Lifesaving Club (TMSLC) was formed in 1916 in the first wave of surf club establishment that followed the Edwardian enthusiasm for sea bathing, and has been one of the strongest clubs in New Zealand ever since. The club's biggest annual event is the Kesteven Cup, held regularly since 1918. The baches at Taylor's have always played a big part in the success of their local surf club, providing a pool from which members are drawn and through which memberships are maintained. The fact that many baches have been owned by the same families through multiple generations has contributed to a distinct family culture at the TMSLC. While the baches have contributed to the well-being of the TMSLC, the relationship has been two-way, and the club has also provided an on-going community focus for bach owners over the last century.

The public esteem for the wider Taylor's Mistake area has been regularly and consistently demonstrated by its representation in the visual media through the years as an archetypal bach community. In the middle decades of the 20th century, the bay was an accessible subject for the 'Canterbury School' of regionalist painters. The most well-known of these paintings is Bill Sutton's *Untitled (Taylor's Mistake)* of the late 1940s. The bay has also been depicted by Francis Shurrock, Rosa Sawtell, Doris Lusk, and Cecil and Elizabeth Kelly. Since the 1980s, nostalgia for and celebration of the traditional bach way of life has seen Taylor's Mistake baches frequently depicted in picture books and other popular media. This exposure has contributed to Taylor's Mistake becoming one of New Zealand's better-known and most iconic beach settlements.

ARCHITECTURAL AND AESTHETIC SIGNIFICANCE

Architectural and aesthetic values that demonstrate or are associated with: a particular style, period or designer, design values, form, scale, colour, texture and material of the place.

Bach 7 has architectural and aesthetic significance as an example of what is now considered a distinctive sub-group of New Zealand architecture, the small vernacular dwellings that were typically built to serve as baches in the early decades of the twentieth century.

Such dwellings were usually owner built and designed without formal plans (or planning), constructed of locally-sourced, affordable or found materials, and often later altered and adapted to suit owners' needs as required. Bach design was usually individual and particular to the site, with design and style reflecting the notions, needs and means of their owners. Many of the first generation of baches were formed from shore-line caves. The remote location of many Taylor's Mistake baches - where most materials had to be carried or boated in - encouraged the use of lightweight materials and whatever was immediately to hand. By mid-century, baches were usually more substantial structures, built of commercial materials such as fibre cement cladding (Fibrolite/Polite), possibly as a result of changing building code requirements. Although they were more akin to permanent dwellings, these baches resembled their predecessors in so far as they were usually designed by their owners and generally did not follow typical domestic models. Built for an informal lifestyle, they tended to adhere more to a mid-century art deco or modernist-derived aesthetic, with features such as mono-pitch roofs, open-plan layouts and indoor-outdoor flow.

Bach 7 reflects the typology and characteristics of the 'kiwi' bach in its simple forms and materials. It is a simple gabled timber structure with a 'catslide' corrugated iron roof and rusticated weatherboard cladding on some sides. In the mid-20th century, an entry porch was filled in, larger casement windows were fitted and the seaward side was clad in flat iron sheet. More recently the large chimney on the north elevation was removed following damage sustained in the Canterbury Earthquake sequence of 2010-2011. An aluminium box window was fitted to the eastern elevation to replace an existing window about the same time. Many baches across Taylor's Mistake underwent modernisation in the post-war decades as expectations changed and new lower maintenance materials became available. Otherwise the bach has been little altered since construction and is also in reasonable repair. It therefore retains a moderate degree of integrity and authenticity.

TECHNOLOGICAL AND CRAFTSMANSHIP SIGNIFICANCE

Technological and craftsmanship values that demonstrate or are associated with: the nature and use of materials, finishes and/or technological or constructional methods which were innovative, or of notable quality for the period.

Bach 7 has craftsmanship significance as a vernacular building, constructed of a variety of materials. The use of timber and tin is comparable with the majority of baches built at Taylor's Mistake at this time, and reflects what was affordable and easily transported or readily available. The materials are similar to many other baches around New Zealand and the wider Taylor's Mistake area. Tin was a practical and inexpensive material often employed for cladding where weathering was an ongoing issue, as it required little maintenance. There are examples of its use in Lyttelton, and on Banks Peninsula buildings.

CONTEXTUAL SIGNIFICANCE

Contextual values that demonstrate or are associated with: a relationship to the environment (constructed and natural), a landscape, setting, group, precinct or streetscape; a degree of consistency in terms of type, scale, form, materials, texture, colour, style and/or detail; recognised landmarks and landscape which are recognised and contribute to the unique identity of the environment.

Bach 7 has contextual significance on its site and within its setting. The contextual significance of the bach is derived partly from its location in the coastal landscape, and partly from its association with the neighbouring baches of Boulder Bay - similarly small scale and informally-built dwellings forming an isolated and distinctive settlement within the larger Taylor's Mistake area. Bach 7 is located on the beachfront in the midst of the small sheltered

sweep of Boulder Bay. It overlooks the stony beach, and across to Whitewash Head, Christchurch and the Southern Alps.

The baches in Boulder Bay are located close to the shore along the small bay characterised by rocky boulders. They are commonly single storey, small, with simple forms and low gabled roofs clad in with corrugated iron. Many have chimneys. Walls are clad in Fibrolite or with boulders, or plastered concrete. The baches are characteristically painted light colours for walls, such as greens, blue and red. Window forms are small and simple, with timber framing, and glazed doors are common.

Bach 7 relates strongly to this group in terms of its design, scale, form, materials, texture, colour and location and is a key contributor to the group. The group of baches of Boulder Bay are a well-known landmark in Christchurch as they are a prominent feature of the bay and its popular coastal walk.

ARCHAEOLOGICAL AND SCIENTIFIC SIGNIFICANCE

Archaeological or scientific values that demonstrate or are associated with: the potential to provide information through physical or scientific evidence an understanding about social historical, cultural, spiritual, technological or other values of past events, activities, structures or people.

Bach 7 and its setting are of archaeological significance because they have the potential to provide archaeological evidence relating to past building construction methods and materials, and human activity on the site. There was no known Māori settlement at Taylor's Mistake (Te Onepoto/short beach), but it is likely to have been employed in mahinga kai (food gathering). Baches were developed in the area from the late 19th century.

ASSESSMENT STATEMENT

Bach 7 and its setting are of overall heritage significance to Christchurch, including Banks Peninsula. The bach has historical and social significance as a reflection of aspects of changing patterns of recreation and leisure in early 20th century New Zealand, for its association with nationally well-known historian and cultural figure Johannes Andersen, its long and ongoing association with the Jamieson family, and as part of the well-known Taylor's Mistake bach community. It has cultural significance for the manner in which it signifies the informal do-it-yourself bach way of life of the early and mid-20th century, for the generational family ownership which is part of its history and for the public esteem in which the area is held as evidenced by its frequent artistic representation. The building has architectural and aesthetic significance as it typifies bach design of the early decades of the 20th century, and the common adaptation and alteration of baches over time. It has technological and craftsmanship significance for its use of materials and construction which was characteristic for baches. It has contextual significance on its site and within its setting, for its relationship to the landscape and bay, and for its shared physical characteristics with the landmark group of baches, of which it is a key contributor. Bach 7 and its setting are of archaeological significance because they have the potential to provide archaeological evidence relating to past building construction methods and materials, and human activity on the site.

REFERENCES:

R. Cairns; B. Turpin *Guardians of the Mistake: the history of the Taylor's Mistake Surf Life Saving Club 1916-1991*

P. Carpinter; K. Tutty *Taylor's Mistake - Over the Hill for 100 Years: a history of Taylor's Mistake Surf Life Saving Club 1916-2016*

Papers Past website

Births, Deaths and Marriages website

J. Abbott; *At the Bay* 2016.

Taylor's Mistake Association files

Paul Thompson *The Bach* (1985)

Kevyn Male's *Good Old Kiwi Baches* (2001)

REPORT DATED: 14 OCTOBER 2021

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PLEASE USE IN CONJUNCTION WITH THE CHRISTCHURCH CITY COUNCIL HERITAGE FILES.

**CHRISTCHURCH DISTRICT PLAN – SCHEDULED HERITAGE PLACE
HERITAGE ASSESSMENT – STATEMENT OF SIGNIFICANCE
HERITAGE ITEM NUMBER 1425
*BACH AND SETTING - 8 TAYLOR'S MISTAKE BAY,
SCARBOROUGH***



PHOTOGRAPH: G. WRIGHT, 9 FEBRUARY 2017

HISTORICAL AND SOCIAL SIGNIFICANCE

Historical and social values that demonstrate or are associated with: a particular person, group, organisation, institution, event, phase or activity; the continuity and/or change of a phase or activity; social, historical, traditional, economic, political or other patterns.

Bach 8 in Boulder Bay has historical and social significance as a reflection of changing patterns of recreation and leisure in early 20th century New Zealand; for its associations with a succession of families over time, including long term owners the Thom family who have spent their holidays at the bay for more than half a century; and as part of the wider Taylor's Mistake bach community – well-known in Canterbury.

Research to date suggests that Bach 8 was built by Stanley Peryer in the early 1920s. He had become a member of the newly founded Taylor's Mistake Surf Life Saving Club (TMSLC) around 1916/1917. In the mid-1930s, the Boulder Bay bach was sold to James Poland.

After the war, Bach 8 was sold to Mr and Mrs E. Russell. They in turn sold it to the Wendelken family in the mid-1950s. After the Wendelkens applied for but failed to get permission from the City Council to build a new holiday home between baches 5 and 6 (the council ceased granting permission for new baches after WWII), they on-sold Bach 8 to William (Bill) Thom in the late 1950s. Bill Thom and his wife Joan owned a successful glass and mirror business in St Asaph Street. The large Thom family still holiday at Bach 8, continuing a tradition of more than 50 years.

CULTURAL AND SPIRITUAL SIGNIFICANCE

Cultural and spiritual values that demonstrate or are associated with the distinctive characteristics of a way of life, philosophy, tradition, religion, or other belief, including: the symbolic or commemorative value of the place; significance to Tangata Whenua; and/or associations with an identifiable group and esteemed by this group for its cultural values.

Bach 8 has cultural significance for the manner in which it signifies the informal do-it-yourself self-sufficient bach way of life of the early and mid-20th century, for the generational family ownership that is part of its history and for the public esteem in which the area is held as evidenced by its frequent artistic representation.

The bach way of life is held to represent values which are quintessentially 'kiwi' representing the New Zealand culture of 'do it yourself' and connecting with the natural environment. Bach 8 is valued by its owners, the Thom family, who have looked after it for the last 60 years. The longevity of family ownership displayed with this bach is also a cultural characteristic of several of the other baches in the wider Taylor's Mistake group and a particular characteristic of Boulder Bay. In Boulder Bay the shortest amount of time a bach has been owned by one of the current families is 20 years or so, and the majority of the baches have been with their current families for between 50 and 80 years.

One particular aspect of the kiwi bach way of life represented by many of the Taylor's Mistake baches (including Bach 8) is a frequent connection with surf lifesaving. The Taylor's Mistake Surf Lifesaving Club (TMSLC) was formed in 1916 in the first wave of surf club establishment that followed the Edwardian enthusiasm for sea bathing, and has been one of the strongest clubs in New Zealand ever since. The club's biggest annual event is the Kesteven Cup, held regularly since 1918. The baches at Taylor's have always played a big part in the success of their local surf club, providing a pool from which members are drawn and through which memberships are maintained. The fact that many baches have been owned by the same families through multiple generations has contributed to a distinct family culture at the TMSLC. While the baches have contributed to the well-being of the TMSLC, the relationship has been two-way, and the club has also provided an on-going community focus for bach owners over the last century.

The public esteem for the wider Taylor's Mistake area has been regularly and consistently demonstrated by its representation in the visual media through the years as an archetypal bach community. In the middle decades of the 20th century, the bay was an accessible subject for the 'Canterbury School' of regionalist painters. The most well-known of these paintings is Bill Sutton's *Untitled (Taylor's Mistake)* of the late 1940s. The bay has also been depicted by Francis Shurrock, Rosa Sawtell, Doris Lusk, and Cecil and Elizabeth Kelly. Since the 1980s, nostalgia for and celebration of the traditional bach way of life has seen Taylor's Mistake baches frequently depicted in picture books and other popular media. This exposure has contributed to Taylor's Mistake becoming one of New Zealand's better-known and most iconic beach settlements.

ARCHITECTURAL AND AESTHETIC SIGNIFICANCE

Architectural and aesthetic values that demonstrate or are associated with: a particular style, period or designer, design values, form, scale, colour, texture and material of the place.

Bach 8 has architectural and aesthetic significance as an example of what is now considered a distinctive sub-group of New Zealand architecture, the small vernacular dwellings that were typically built to serve as baches in the early decades of the 20th century.

Such dwellings were usually owner built and designed without formal plans (or planning), constructed of locally-sourced, affordable or found materials, and often later altered and adapted to suit owners' needs as required. Bach design was usually individual and particular to the site, with design and style reflecting the notions, needs and means of their owners. Many of the first generation of baches were formed from shore-line caves. The remote location of many Taylor's Mistake baches - where most materials had to be carried or boated in - encouraged the use of lightweight materials and whatever was immediately to hand. By mid-century, baches were usually more substantial structures, built of commercial materials such as fibre cement cladding (Fibrolite/Polite), possibly as a result of changing building code

requirements. Although they were more akin to permanent dwellings, these baches resembled their predecessors in so far as they were usually designed by their owners and generally did not follow typical domestic models. Built for an informal lifestyle, they tended to adhere more to a mid-century art deco or modernist-derived aesthetic, with features such as mono-pitch roofs, open-plan layouts and indoor-outdoor flow.

Bach 8 reflects the typology and characteristics of the 'kiwi' bach in its simple forms and materials. It appears to have begun life as a simple gabled structure with a cat-slide roof – not dissimilar to the adjacent Bach 7. Before World War II, a low-pitched addition was made to the front. During the 1960s and 1970s, Bill Thom modernized and upgraded the bach to accommodate his large family with assistance from neighbours Lance Robertson (Bach 6) and Dick Bain (Bach 4). The original board and batten cladding was removed and replaced with Polite, and the wooden windows replaced with aluminium. Many baches across Taylor's Mistake underwent modernisation in the post-war decades as expectations changed and new lower maintenance materials became available. The bach still retained its chimney in 2017. The bach is in reasonable condition given that it sustained some damage in the Canterbury Earthquake sequence of 2010-2011, which has not been repaired.

TECHNOLOGICAL AND CRAFTSMANSHIP SIGNIFICANCE

Technological and craftsmanship values that demonstrate or are associated with: the nature and use of materials, finishes and/or technological or constructional methods which were innovative, or of notable quality for the period.

Bach 8 has craftsmanship significance as for its vernacular construction, reflecting the building techniques and materials of the early and mid-20th century. The choice of materials – initially board and batten and timber, and latterly Polite board with aluminium joinery, reflect what was affordable, easily transportable and readily available at the time of construction, and is comparable with many of the baches constructed in New Zealand and the wider Taylor's Mistake area.

CONTEXTUAL SIGNIFICANCE

Contextual values that demonstrate or are associated with: a relationship to the environment (constructed and natural), a landscape, setting, group, precinct or streetscape; a degree of consistency in terms of type, scale, form, materials, texture, colour, style and/or detail; recognised landmarks and landscape which are recognised and contribute to the unique identity of the environment.

Bach 8 has contextual significance on its site and within its setting. The contextual significance of the bach is derived partly from its location in the coastal landscape, and partly from its association with the neighbouring baches of Boulder Bay - similarly small scale and informally-built dwellings forming an isolated and distinctive settlement within the larger Taylor's Mistake area. It is located on the beachfront in the midst of the small sheltered sweep of Boulder Bay and overlooks the stony beach across to Whitewash Head, Christchurch and the Southern Alps.

The baches in Boulder Bay are located close to the shore along the small bay characterised by rocky boulders. They are commonly single storey, small, with simple forms and low gabled roofs clad in with corrugated iron. Many have chimneys. Walls are clad in Fibrolite or with boulders, or plastered concrete. The baches are characteristically painted light colours for walls, such as greens, blue and red. Window forms are small and simple, with timber framing, and glazed doors are common.

Bach 8 relates strongly to this group in terms of design, scale, form, materials, texture, colour and location and is a key contributor to the group. The baches of Boulder Bay are a well-known landmark in Christchurch as they are a prominent feature of the bay and its popular coastal walk.

ARCHAEOLOGICAL AND SCIENTIFIC SIGNIFICANCE

Archaeological or scientific values that demonstrate or are associated with: the potential to provide information through physical or scientific evidence an understanding about social

historical, cultural, spiritual, technological or other values of past events, activities, structures or people.

Bach 8 and its setting are of archaeological significance because they have the potential to provide archaeological evidence relating to past building construction methods and materials, and human activity on the site. There was no known Māori settlement at Taylor's Mistake (Te Onepoto/short beach), but it is likely to have been employed in mahinga kai (food gathering). Baches were developed in the area from the late 19th century.

ASSESSMENT STATEMENT

Bach 8 and its setting are of overall heritage significance to Christchurch, including Banks Peninsula. The bach has historical and social significance as a reflection of aspects of changing patterns of recreation and leisure in early 20th century New Zealand, for its associations with a succession of families, in particular the Thom family who have spent their holidays at the bay for over half a century; and as part of the well-known Taylor's Mistake bach community. The bach has cultural significance for the manner in which it signifies the informal do-it-yourself bach way of life of the early and mid-20th century, for the generational family ownership that is part of its history and for the public esteem in which the area is held as evidenced by its frequent artistic representation. The building has architectural and aesthetic significance as it typifies bach design of the early decades of the 20th century, and the common adaptation and alteration of baches over time. It has technological and craftsmanship significance for its use of materials and construction which was characteristic for baches. It has contextual significance on its site and within its setting, for its relationship to the landscape and bay, and for its shared physical characteristics with the landmark group of baches, of which it is a key contributor. Bach 8 and its setting are of archaeological significance because they have the potential to provide archaeological evidence relating to past building construction methods and materials, and human activity on the site.

REFERENCES:

R. Cairns; B. Turpin *Guardians of the Mistake: the history of the Taylor's Mistake Surf Life Saving Club 1916-1991*

P. Carpinter; K. Tutty *Taylor's Mistake - Over the Hill for 100 Years: a history of Taylor's Mistake Surf Life Saving Club 1916-2016*

Papers Past website

Births, Deaths and Marriages website

J. Abbott *At the Bay* 2016

Taylor's Mistake Association files

Paul Thompson *The Bach* (1985)

Kevyn Male's *Good Old Kiwi Baches* (2001)

REPORT DATED: 14 OCTOBER 2021

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PLEASE USE IN CONJUNCTION WITH THE CHRISTCHURCH CITY COUNCIL HERITAGE FILES.

**CHRISTCHURCH DISTRICT PLAN – SCHEDULED HERITAGE PLACE
HERITAGE ASSESSMENT – STATEMENT OF SIGNIFICANCE
HERITAGE ITEM NUMBER 1424
*BACH AND SETTING - 9 TAYLOR'S MISTAKE BAY,
SCARBOROUGH***



PHOTOGRAPH: G. WRIGHT, 9 FEBRUARY 2017

HISTORICAL AND SOCIAL SIGNIFICANCE

Historical and social values that demonstrate or are associated with: a particular person, group, organisation, institution, event, phase or activity; the continuity and/or change of a phase or activity; social, historical, traditional, economic, political or other patterns.

Bach 9 in Boulder Bay has historical and social significance as a reflection of changing patterns of recreation and leisure in early 20th century New Zealand; for its 80-year association with the Storey family; and as part of the wider Taylor's Mistake bach community – well-known in Canterbury.

Bach 9, *The Stone Jug*, was one of the last baches to be built at Boulder Bay. The first owner started building it in the early to mid-1930s, pouring the walls, but sold it before completion to Frederick Storey (Fred), an electrician from Phillipstown.¹ Fred then went on and finished the build with the assistance of a group of friends. Building supplies were rowed around from Sumner by Fred. During the 1930s, Fred was Club Captain of Te Hapu Koa (later The Christchurch) Tramping Club. In 1937 the club ran a trip to Taylor's Mistake which visited his newly-completed bach. Later Fred married fellow club member Gwladys Mitchell. Their family still holiday at the bach making them the family with the longest unbroken connection to a bach in Boulder Bay.

¹ The first owner may have been Athel Crowley, whose father Randal built Bach 5. Athel was granted a hut permit in October 1930, but had his license fees written off in December 1932 – suggesting the hut had not been completed. He took his father's bach over in December 1934. SBC Minute Books.

CULTURAL AND SPIRITUAL SIGNIFICANCE

Cultural and spiritual values that demonstrate or are associated with the distinctive characteristics of a way of life, philosophy, tradition, religion, or other belief, including: the symbolic or commemorative value of the place; significance to Tangata Whenua; and/or associations with an identifiable group and esteemed by this group for its cultural values.

Bach 9 has cultural significance for the manner in which it signifies the informal do-it-yourself bach way of life of the early and mid-20th century, for the generational family ownership that is part of its history and for the public esteem in which the area is held as evidenced by its frequent artistic representation.

The bach way of life is held to represent values which are quintessentially 'kiwi' representing the New Zealand culture of 'do it yourself' and connecting with the natural environment. Bach 9 is valued by its owners, the Storey family, who have owned and looked after it for the last 80 years. The longevity of family ownership displayed with this bach is also a cultural characteristic of several of the other baches in the wider Taylor's Mistake group and a particular characteristic of Boulder Bay. No other individual baches in Boulder Bay have a connection this long with one family. The shortest amount of time a bach has been owned by one of the current families is 20 years or so, and the majority of the baches have been with their current families for between 50 and 80 years.

One particular aspect of the kiwi bach way of life represented by many of the Taylor's Mistake baches is a frequent connection with surf lifesaving. The Taylor's Mistake Surf Lifesaving Club (TMSLC) was formed in 1916 in the first wave of surf club establishment that followed the Edwardian enthusiasm for sea bathing, and has been one of the strongest clubs in New Zealand ever since. The club's biggest annual event is the Kesteven Cup, held regularly since 1918. The baches at Taylor's have always played a big part in the success of their local surf club, providing a pool from which members are drawn and through which memberships are maintained. The fact that many baches have been owned by the same families through multiple generations has contributed to a distinct family culture at the TMSLC. While the baches have contributed to the well-being of the TMSLC, the relationship has been two-way, and the club has also provided an on-going community focus for bach owners over the last century.

The public esteem for the wider Taylor's Mistake area has been regularly and consistently demonstrated by its representation in the visual media through the years as an archetypal bach community. In the middle decades of the 20th century, the bay was an accessible subject for the 'Canterbury School' of regionalist painters. The most well-known of these paintings is Bill Sutton's *Untitled (Taylor's Mistake)* of the late 1940s. The bay has also been depicted by Francis Shurrock, Rosa Sawtell, Doris Lusk, and Cecil and Elizabeth Kelly. Since the 1980s, nostalgia for and celebration of the traditional bach way of life has seen Taylor's Mistake baches frequently depicted in picture books and other popular media. This exposure has contributed to Taylor's Mistake becoming one of New Zealand's better-known and most iconic beach settlements.

ARCHITECTURAL AND AESTHETIC SIGNIFICANCE

Architectural and aesthetic values that demonstrate or are associated with: a particular style, period or designer, design values, form, scale, colour, texture and material of the place.

Bach 9 has architectural and aesthetic significance as an example of what is now considered a distinctive sub-group of New Zealand architecture, the small vernacular dwellings that were typically built to serve as baches in the early decades of the 20th century.

Such dwellings were usually owner built and designed without formal plans (or planning), constructed of locally-sourced, affordable or found materials, and often later altered and adapted to suit owners' needs as required. Bach design was usually individual and particular to the site, with design and style reflecting the notions, needs and means of their owners. Many of the first generation of baches were formed from shore-line caves. The remote location of many Taylor's Mistake baches - where most materials had to be carried or boated

in - encouraged the use of lightweight materials and whatever was immediately to hand. By mid-century, baches were usually more substantial structures, built of commercial materials such as fibre cement cladding (Fibrolite/Polite), possibly as a result of changing building code requirements. Although they were more akin to permanent dwellings, these baches resembled their predecessors in so far as they were usually designed by their owners and generally did not follow typical domestic models. Built for an informal lifestyle, they tended to adhere more to a mid-century art deco or modernist-derived aesthetic, with features such as mono-pitch roofs, open-plan layouts and indoor-outdoor flow.

Bach 9 reflects the typology and characteristics of the 'kiwi' bach in its simple forms, lack of embellishment, and material used. It is a simple boxy form with a hipped corrugated iron roof. The poured concrete construction method was unusual at Taylor's Mistake at the time when most baches were timber. Baches 5, 31 and elements of 32 were built in a similar fashion. The form and diminutive scale of Bach 9 remain as built, but the fenestration has been altered. Originally the bach had a central door with windows either side; the door has since been closed off and the northern window replaced with French doors. The original timber windows have also been entirely replaced in aluminium. Despite this change, the bach still retains a moderate degree of authenticity.

TECHNOLOGICAL AND CRAFTSMANSHIP SIGNIFICANCE

Technological and craftsmanship values that demonstrate or are associated with: the nature and use of materials, finishes and/or technological or constructional methods which were innovative, or of notable quality for the period.

Bach 9 has technological and craftsmanship significance for its vernacular construction in poured concrete completed by its owner Fred Storey with materials that he boated to the site. The employment of concrete in this remote context is unusual as it is a labour-intensive method of construction that required the transport to the bay of materials from outside the area. At this time it was normally used for domestic buildings in residential areas. The novelty of the material is underlined by the fact that most baches at Taylor's Mistake in this period were timber-fronted caves or lightly-framed board and batten-clad huts. The bach can be understood however as a response to place given gravel for the concrete was readily available from the beach, which was not the case elsewhere at Taylor's Mistake. This is also reflected in the employment of boulders in the construction of Baches 1 and 2, and concrete for Bach 5.

CONTEXTUAL SIGNIFICANCE

Contextual values that demonstrate or are associated with: a relationship to the environment (constructed and natural), a landscape, setting, group, precinct or streetscape; a degree of consistency in terms of type, scale, form, materials, texture, colour, style and/or detail; recognised landmarks and landscape which are recognised and contribute to the unique identity of the environment.

Bach 9 has contextual significance on its site and within its setting. The contextual significance of the bach is derived partly from its location in the coastal landscape, and partly from its association with the neighbouring baches of Boulder Bay - similarly small scale and informally-built dwellings forming an isolated and distinctive settlement within the larger Taylor's Mistake area. Bach 9 is located on the beachfront in the midst of the small sheltered sweep of Boulder Bay and overlooks the stony beach across to Whitewash Head, Christchurch and the Southern Alps.

The baches in Boulder Bay are located close to the shore along the small bay characterised by rocky boulders. They are commonly single storey, small, with simple forms and low gabled roofs clad in with corrugated iron. Many have chimneys. Walls are clad in Fibrolite or with boulders, or plastered concrete. The baches are characteristically painted light colours for walls, such as greens, blue and red. Window forms are small and simple, with timber framing, and glazed doors are common.

Bach 9 relates strongly to this group in terms of design, scale, form, materials, texture, colour and location and is a key contributor to the group. In particular bach 9 relates to the other

concrete baches in the group. The group of baches of Boulder Bay are a well-known landmark in Christchurch as they are a prominent feature of the bay and its popular coastal walk.

ARCHAEOLOGICAL AND SCIENTIFIC SIGNIFICANCE

Archaeological or scientific values that demonstrate or are associated with: the potential to provide information through physical or scientific evidence an understanding about social historical, cultural, spiritual, technological or other values of past events, activities, structures or people.

Bach 9 and its setting are of archaeological significance because they have the potential to provide archaeological evidence relating to past building construction methods and materials, and human activity on the site. There was no known Māori settlement at Taylor's Mistake (Te Onepoto/short beach), but it was likely to have been employed in mahinga kai (food gathering). Baches were developed in the area from the late 19th century.

ASSESSMENT STATEMENT

Bach 9 and its setting are of overall heritage significance to Christchurch, including Banks Peninsula. The bach has historical and social significance as a reflection of aspects of changing patterns of recreation and leisure in early 20th century New Zealand, for its long association with the Storey family who have spent their holidays at the bay for 80 years; and as part of the well-known Taylor's Mistake bach community. It has cultural significance for the manner in which it signifies the informal do-it-yourself bach way of life of the early and mid-20th century, for the generational family ownership that is part of its history and for the public esteem in which the area is held as evidenced by its frequent artistic representation. The building has architectural and aesthetic significance as it typifies bach design of the early decades of the 20th century, and the common adaptation and alteration of baches over time. It has technological and craftsmanship significance for its use of poured concrete construction and construction which was unusual at the time but became characteristic for some baches in the group. It has contextual significance on its site and within its setting, for its relationship to the landscape and bay, and for its shared physical characteristics with the landmark group of baches, of which it is a key contributor. Bach 9 and its setting are of archaeological significance because they have the potential to provide archaeological evidence relating to past building construction methods and materials, and human activity on the site.

REFERENCES:

R. Cairns; B. Turpin *Guardians of the Mistake: the history of the Taylor's Mistake Surf Life Saving Club 1916-1991*

P. Carpinter; K. Tutty *Taylor's Mistake - Over the Hill for 100 Years: a history of Taylor's Mistake Surf Life Saving Club 1916-2016*

Papers Past website

Births, Deaths and Marriages website

J. Abbott; *At the Bay* 2016.

Taylor's Mistake Association files

Sumner Borough Council Minute Books (CCC Archives; formerly held at Archives New Zealand). Digest of references to Taylor's Mistake compiled by O. Snoep, 1993 (CCC files).

Paul Thompson *The Bach* (1985)

Kevyn Male's *Good Old Kiwi Baches* (2001)

REPORT DATED: 14 OCTOBER 2021

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**CHRISTCHURCH DISTRICT PLAN – SCHEDULED HERITAGE PLACE
HERITAGE ASSESSMENT – STATEMENT OF SIGNIFICANCE
HERITAGE ITEM NUMBER 1445
*BACH AND SETTING - 34 TAYLOR’S MISTAKE BAY,
SCARBOROUGH***



PHOTOGRAPH: G. WRIGHT, 2017

HISTORICAL AND SOCIAL SIGNIFICANCE

Historical and social values that demonstrate or are associated with: a particular person, group, organisation, institution, event, phase or activity; the continuity and/or change of a phase or activity; social, historical, traditional, economic, political or other patterns.

Bach 34 in Rotten Row has historical and social significance as a reflection of patterns of recreation and leisure in early and mid-twentieth century New Zealand; for its association with long-standing bach owners Thomas Malloy and the Meers family; and as part of the Taylor’s Mistake bach community – well-known in Christchurch.

The largest single concentration of baches at Taylor’s Mistake is so-called Rotten Row, a string of nineteen baches arrayed along the shore on the eastern side of the bay. The first bach in the Row was constructed in 1913 by blacksmith William Stevens. By 1920 there were a dozen baches in this location. Bach 34 is located in the middle of the Row.

Bach 34 was built by Thomas (Tom) Malloy before 1920 - the exact date of construction is unknown. Malloy was from Ireland and served in the Royal Naval Reserve for twenty years. In the early 20th century Malloy settled in Lyttelton and became a watersider. In their leisure time, Lyttelton’s port workers would walk over the hills to Taylor’s Mistake to enjoy the shooting and fishing opportunities that the area had to offer. A number of watersiders established baches in the bay during the first wave of construction around World War I, such as Henry Eastwick (Bach 42) and Tom Malloy. In an early image of Rotten Row (c1930), the

name *Awarua* can be seen spelt out in large whitewashed stones across the bank in front of the bach.¹

After Tom's death in 1941, his bach passed to Ernest (Stan) Meers and his wife Ethel. The couple had a son called Ron. The bach remained in the Meers family for over 60 years. During World War II Bach 34 was one of the baches requisitioned by the army and occupied by soldiers. During a machine gun exercise, it is recorded that Bach 34 was damaged by six bullets. After the war the Meers family resumed holidays at Bach 34. Stan shot rabbits and fished. Ron and his cousins Martin and George Rowland (who later owned Bach 17) trapped and ferreted. Ron and his wife Gwenyth took the bach over in the 1970s, but less use was made of it. The present owner purchased the bach from Ron in c2004.

CULTURAL AND SPIRITUAL SIGNIFICANCE

Cultural and spiritual values that demonstrate or are associated with the distinctive characteristics of a way of life, philosophy, tradition, religion, or other belief, including: the symbolic or commemorative value of the place; significance to Tangata Whenua; and/or associations with an identifiable group and esteemed by this group for its cultural values.

Bach 34 has cultural significance for the manner in which it signifies the informal do-it-yourself self-sufficient bach way of life of the early and mid-20th century, for the longevity of family ownership that is part of its history and for the public esteem in which the area is held as evidenced by its frequent artistic representation. The bach way of life is held to represent values which are quintessentially 'kiwi' representing the New Zealand culture of 'do it yourself' and connecting with the natural environment. The length of time the bach remained in the ownership of one family is a cultural characteristic of several of the baches in the wider Taylor's Mistake group.

The public esteem for the wider Taylor's Mistake area has been regularly and consistently demonstrated by its representation in the visual media through the years as an archetypal bach community. In the middle decades of the 20th century, the bay was an accessible subject for the 'Canterbury School' of regionalist painters. The most well-known of these paintings is Bill Sutton's *Untitled (Taylor's Mistake)* of the late 1940s. The bay has also been depicted by Francis Shurrock, Rosa Sawtell, Doris Lusk, and Cecil and Elizabeth Kelly. Since the 1980s, nostalgia for and celebration of the traditional bach way of life has seen Taylor's Mistake baches frequently depicted in picture books and other popular media. This exposure has contributed to Taylor's Mistake becoming one of New Zealand's better-known and most iconic beach settlements.

ARCHITECTURAL AND AESTHETIC SIGNIFICANCE

Architectural and aesthetic values that demonstrate or are associated with: a particular style, period or designer, design values, form, scale, colour, texture and material of the place.

Bach 34 has architectural and aesthetic significance as an example of what is now considered a distinctive sub-group of New Zealand architecture, the small vernacular dwellings that were typically built to serve as baches in the early decades of the 20th century.

Such dwellings were usually owner built and designed without formal plans (or planning), constructed of locally-sourced, affordable or found materials, and often later altered and adapted to suit owners' needs as required. Bach design was usually individual and particular to the site, with design and style reflecting the notions, needs and means of their owners. Many of the first generation of baches were formed from shore-line caves. The remote location of many Taylor's Mistake baches - where most materials had to be carried or boated in - encouraged the use of lightweight materials and whatever was immediately to hand. By mid-century, baches were usually more substantial structures, built of commercial materials such as fibre cement cladding (Fibrolite/Polite), possibly as a result of changing building code requirements. Although they were more akin to permanent dwellings, these baches resembled their predecessors in so far as they were usually designed by their owners and generally did not follow typical domestic models. Built for an informal lifestyle, they tended to

¹ *Awarua* may be a variant of *Awaroa*, the Maori name for Godley Head.

adhere more to a mid-century art deco or modernist-derived aesthetic, with features such as mono-pitch roofs, open-plan layouts and indoor-outdoor flow.

Bach 34 reflects the typology and characteristics of the 'kiwi' bach in its simple forms and materials. It was built by Thomas Malloy in c1918; like most of the first generation of baches at Taylor's Mistake it consisted of a modest skillion-roofed weatherboard hut with rooms accessed externally. Research to date suggests that Tom's bach was constructed at least in part from dunnage washed up on the coast. Most Rotten Row baches were extended and modernized in the relatively prosperous post World War II decades, but Bach 34 essentially retains its pre-1930 appearance. Some alterations have been made by the present owner.

TECHNOLOGICAL AND CRAFTSMANSHIP SIGNIFICANCE

Technological and craftsmanship values that demonstrate or are associated with: the nature and use of materials, finishes and/or technological or constructional methods which were innovative, or of notable quality for the period.

Bach 34 has technological and craftsmanship significance as a vernacular building, reflecting the building techniques and materials of the early 20th century. The choice of materials, timber and tin, is comparable with the majority of baches built at Taylor's Mistake at this time, and many other baches around New Zealand, such as Rangitoto and Tongaporutu River. Research to date suggests that Tom's bach was constructed at least in part from dunnage washed up on the coast.

CONTEXTUAL SIGNIFICANCE

Contextual values that demonstrate or are associated with: a relationship to the environment (constructed and natural), a landscape, setting, group, precinct or streetscape; a degree of consistency in terms of type, scale, form, materials, texture, colour, style and/or detail; recognised landmarks and landscape which are recognised and contribute to the unique identity of the environment.

Bach 34 has contextual significance on its site and within its setting. The contextual significance of the bach is derived partly from its location in the coastal landscape, and partly from its association with the other small scale and informally-built baches of Taylor's Mistake.

Rotten Row is a linear group of baches located on the sandy foreshore behind the Taylor's Mistake beach close to the foot of the steep hills behind and oriented towards the beach and the bay. The majority of baches in this group are single storied, with small footprints. They are characterised by simple roof and window forms, flat/smooth wall cladding (flat sheets of fibrolite) and usually no decorative elements. The baches are additive in nature with gabled roof or skillion roof forms, commonly with lean-tos and flat or skillion roofed additions. This group are commonly clad in Fibrolite, weatherboard or corrugated iron, with iron roofs. Paint colours range from neutral beige and brown to green and vibrant blues. Windows usually make up a large proportion of the principal facades to maximise light and views, and are timber framed. Glazed French doors are also common. Raised up above the beach, the baches are usually accessed via steps. Many of the baches feature small uncovered decks and concrete porches. There are generally open grassed areas and low informal gardens to the front, which include shrubs, succulents and cabbage trees.

Bach 34 relates strongly to this group in terms of its design, form, scale, materials, texture and location and is a key contributor to the group. It is located towards the northern end of Rotten Row. The group of baches of Taylor's Mistake are a well-known landmark in Christchurch as they are a prominent feature of the bay and its popular coastal walk.

ARCHAEOLOGICAL AND SCIENTIFIC SIGNIFICANCE

Archaeological or scientific values that demonstrate or are associated with: the potential to provide information through physical or scientific evidence and understanding about social historical, cultural, spiritual, technological or other values of past events, activities, structures or people.

Bach 34 and its setting are of archaeological significance because they have the potential to provide archaeological evidence relating to past building construction methods and materials, and human activity on the site. There was no known Māori settlement at Taylor's Mistake (Te Onepoto/short beach), but it is likely to have been employed in mahinga kai (food gathering). Baches were developed in the area from the late 19th century.

ASSESSMENT STATEMENT

Bach 34 and its setting are of overall heritage significance to Christchurch, including Banks Peninsula.

The bach has historical and social significance as a reflection of aspects of patterns of recreation and leisure in early and mid-20th century New Zealand; for its association with long-standing bach owners Thomas Malloy and the Meers family; and as part of the Taylor's Mistake bach community – well-known in Christchurch. It has cultural significance for the manner in which it signifies the informal do-it-yourself bach way of life of the early and mid-20th century, for the longevity of the family ownership associated with it and for its frequent artistic representation. The building has architectural and aesthetic significance as it typifies bach design of the early decades of the 20th century, and the common adaptation and alteration of baches over time. It has technological significance as a vernacular building, reflecting the building techniques and materials of the early 20th century, particular to bach construction, which included found materials. It has contextual significance on its site and within its setting, for its relationship to the landscape and bay, and for its shared physical characteristics with the landmark group of baches known as Rotten Row, of which it is a key contributor. The bach and its setting are of archaeological significance because they have the potential to provide archaeological evidence relating to past building construction methods and materials, and human activity on the site.

REFERENCES:

R. Cairns; B. Turpin *Guardians of the Mistake: the history of the Taylor's Mistake Surf Life Saving Club 1916-1991*

P. Carpinter; K. Tutty *Taylor's Mistake - Over the Hill for 100 Years: a history of Taylor's Mistake Surf Life Saving Club 1916-2016*

B. Mortlock, *Life History Report. An appendix to The Taylors Mistake Bach Holders Community Assessment*, 1998

Papers Past website

Births, Deaths and Marriages website

Research notes provided by Janet Abbott, 2018

Taylor's Mistake Association files

Paul Thompson *The Bach* (1985)

Kevyn Male's *Good Old Kiwi Baches* (2001)

REPORT DATED: 7 OCTOBER 2021

PLEASE NOTE THIS ASSESSMENT IS BASED ON INFORMATION AVAILABLE AT THE TIME OF WRITING. DUE TO THE ONGOING NATURE OF HERITAGE RESEARCH, FUTURE REASSESSMENT OF THIS HERITAGE ITEM MAY BE NECESSARY TO REFLECT ANY CHANGES IN KNOWLEDGE AND UNDERSTANDING OF ITS HERITAGE SIGNIFICANCE.

PLEASE USE IN CONJUNCTION WITH THE CHRISTCHURCH CITY COUNCIL HERITAGE FILES.

**CHRISTCHURCH DISTRICT PLAN – SCHEDULED HERITAGE PLACE
HERITAGE ASSESSMENT – STATEMENT OF SIGNIFICANCE
HERITAGE ITEM NUMBER 1422
*BACH AND SETTING - 35 TAYLOR'S MISTAKE BAY,
SCARBOROUGH***



PHOTOGRAPH: G. WRIGHT, 2017

HISTORICAL AND SOCIAL SIGNIFICANCE

Historical and social values that demonstrate or are associated with: a particular person, group, organisation, institution, event, phase or activity; the continuity and/or change of a phase or activity; social, historical, traditional, economic, political or other patterns.

Bach 35 in Rotten Row has historical and social significance as a reflection of aspects of patterns of recreation and leisure in early and mid-twentieth century New Zealand; for its association with long-standing bach owners the Roberts family; and as part of the Taylor's Mistake bach community – well-known in Christchurch.

The largest single concentration of baches at Taylor's Mistake is so-called Rotten Row, a string of 19 baches arrayed along the shore on the eastern side of the bay. The first bach in the Row was constructed in 1913 by blacksmith William Stevens. Research to date suggests that this was an early iteration of Bach 32. By 1920 there were a dozen baches in this location. Bach 35 is located in the middle of the Row.

Bach 35 was in place by 1920. The first positive identification of the bach in the historical record is the transfer of an unidentified bach from L. Agassiz to C. W. Smith in January 1930.¹ Research to date suggests Lewis Agassiz (also owner of adjacent Bach 36) owned Bach 35 from its construction and it was in his possession for approximately 10 years. It was not

¹ Sumner Borough Council Minute Books.

unusual for bach owners to have owned multiple baches at various points in Taylor's Mistake's history.

C. Smith was listed as the owner of Bach 35 in the earliest surviving comprehensive record of Taylor's Mistake bach owners, compiled in 1932.² A. Smith transferred Bach 35 to its next registered owner – Julia Roberts – in April 1941.³

Mrs Roberts of Breezes Road, Aranui, was the mother of Frank Roberts. Like many early Taylor's Mistake bach holders, Frank was a railways employee, working initially as a guard, and then in the yards at Lyttelton and Woolston. He was also a good friend of Ronald McKinlay whose family owned Bach 43. In the early years of World War II, Frank purchased Bach 35 with the assistance of a 25 shilling loan from McKinlay's mother but the bach was entrusted to his parents (William and Julia) and registered in Julia's name as he had just enlisted. Eight months later Bach 35 was one of many baches requisitioned by the army for billeting soldiers.

Following the war Frank settled back in at his bach.⁴ In 1947 he married Viola Hobson who was a Hobson of Hobson's Bay, and grew up staying at Bach 63. She was also a member of the Taylor's Mistake Surf Life Saving Club's inaugural women's team in 1948. At the bottom of the bank in front of Bach 35 was the 'Foxhole' (the name reflecting the military experience of many); a seating area that constituted the social centre of the 'Row' in the post-war decades. This was where the adults at the Bay would gather to socialise.

Frank continued to use the family bach for about ten years after Viola's death in 1983, but eventually leased it to the extended family of his old friend Ronald McKinlay. The McKinlay family then purchased it from Frank's daughter Sue following Frank's death in 2000.

CULTURAL AND SPIRITUAL SIGNIFICANCE

Cultural and spiritual values that demonstrate or are associated with the distinctive characteristics of a way of life, philosophy, tradition, religion, or other belief, including: the symbolic or commemorative value of the place; significance to Tangata Whenua; and/or associations with an identifiable group and esteemed by this group for its cultural values.

Bach 35 has cultural significance for the manner in which it signifies the informal do-it-yourself bach way of life of the early and mid-20th century, for the longevity of family ownership that is part of its history and for the public esteem in which the area is held as evidenced by its frequent artistic representation. The bach way of life is held to represent values which are quintessentially 'kiwi' representing the New Zealand culture of 'do it yourself' and connecting with the natural environment. The length of time the bach remained in the ownership of one family is a cultural characteristic of several of the baches in the wider Taylor's Mistake group.

One particular aspect of the kiwi bach way of life represented by many of the Taylor's Mistake baches (including Bach 35) is a frequent connection with surf lifesaving. The Taylor's Mistake Surf Lifesaving Club (TMSLC) was formed in 1916 in the first wave of surf club establishment that followed the Edwardian enthusiasm for sea bathing, and has been one of the strongest clubs in New Zealand ever since. The baches at Taylor's have always played a big part in the success of their local surf club, providing a pool from which members are drawn and through which memberships are maintained. The fact that many baches have been owned by the same families through multiple generations has contributed to a distinct family culture at the TMSLC. While the baches have contributed to the well-being of the TMSLC, the relationship has been two-way, and the club has also provided an on-going community focus for bach owners over the last century.

The public esteem for the wider Taylor's Mistake area has been regularly and consistently demonstrated by its representation in the visual media through the years as an archetypal bach community. In the middle decades of the 20th century, the bay was an accessible subject for the 'Canterbury School' of regionalist painters. The most well-known of these

² Sumner Borough Council records (Sumner Museum)

³ SBC minute book. Op cit.

⁴ Press 31/01/1991 p 19. Quoted in Abbott.

paintings is Bill Sutton's *Untitled (Taylor's Mistake)* of the late 1940s. The bay has also been depicted by Francis Shurrock, Rosa Sawtell, Doris Lusk, and Cecil and Elizabeth Kelly. Since the 1980s, nostalgia for and celebration of the traditional bach way of life has seen Taylor's Mistake baches frequently depicted in picture books and other popular media. This exposure has contributed to Taylor's Mistake becoming one of New Zealand's better-known and most iconic beach settlements.

ARCHITECTURAL AND AESTHETIC SIGNIFICANCE

Architectural and aesthetic values that demonstrate or are associated with: a particular style, period or designer, design values, form, scale, colour, texture and material of the place.

Bach 35 has architectural and aesthetic significance as an example of what is now considered a distinctive sub-group of New Zealand architecture, the small vernacular dwellings commonly built to serve as baches in the early and middle years of the 20th century.

Such dwellings were usually owner built and designed without formal plans (or planning), constructed of locally-sourced, affordable or found materials, and often later altered and adapted to suit owners' needs as required. Bach design was usually individual and particular to the site, with design and style reflecting the notions, needs and means of their owners. Many of the first generation of baches were formed from shore-line caves. The remote location of many Taylor's Mistake baches - where most materials had to be carried or boated in - encouraged the use of lightweight materials and whatever was immediately to hand. By mid-century, baches were usually more substantial structures, built of commercial materials such as fibre cement cladding (Fibrolite/Polite), possibly as a result of changing building code requirements. Although they were more akin to permanent dwellings, these baches resembled their predecessors in so far as they were usually designed by their owners and generally did not follow typical domestic models. Built for an informal lifestyle, they tended to adhere more to a mid-century art deco or modernist-derived aesthetic, with features such as mono-pitch roofs, open-plan layouts and indoor-outdoor flow.

Bach 35 reflects the typology and characteristics of the 'kiwi' bach in its simple forms and materials. It began life before 1920 as a modest skillion-roofed weatherboard hut. The beach elevation featured a central door framed by two small windows. In early photographs of the 1920s and '30s, it was painted a dark colour with light trim. In the late 1930s, this bach was extensively altered or replaced with the present building, a larger gabled structure clad in ferro-cement sheet, reflecting the changes in approaches to bach building at the time. The beach elevation was later altered (as were many in the post war decades) with a lean-to bay and French doors.

TECHNOLOGICAL AND CRAFTSMANSHIP SIGNIFICANCE

Technological and craftsmanship values that demonstrate or are associated with: the nature and use of materials, finishes and/or technological or constructional methods which were innovative, or of notable quality for the period.

Bach 35 has technological and craftsmanship significance as a vernacular building, reflecting the building techniques and materials of the early and mid-20th century. The choice of original materials – timber and tin – is comparable with the majority of baches built at Taylor's Mistake at this time, along with many other baches around New Zealand. The alterations carried out in the late 1930s followed the then trend of baches being constructed of more substantial structures, using ferro-cement sheet and being of an increased size.

CONTEXTUAL SIGNIFICANCE

Contextual values that demonstrate or are associated with: a relationship to the environment (constructed and natural), a landscape, setting, group, precinct or streetscape; a degree of consistency in terms of type, scale, form, materials, texture, colour, style and/or detail; recognised landmarks and landscape which are recognised and contribute to the unique identity of the environment.

Bach 35 has contextual significance on its site and within its setting. The contextual significance of the bach is derived partly from its location in the coastal landscape, and partly from its association with the other small scale and informally-built baches of Taylor's Mistake.

Rotten Row is a linear group of baches located on the sandy foreshore behind the Taylor's Mistake beach close to the foot of the steep hills behind and oriented towards the beach and the bay. Most baches in this group are single storied, with small footprints. They are characterised by simple roof and window forms, flat/smooth wall cladding (flat sheets of fibrolite) and usually no decorative elements. The baches are additive in nature with gabled roof or skillion roof forms, commonly with lean-tos and flat or skillion roofed additions. This group are commonly clad in Fibrolite, weatherboard or corrugated iron, with iron roofs. Paint colours range from neutral beige and brown to green and vibrant blues. Windows usually make up a large proportion of the principal facades to maximise light and views, and are timber framed. Glazed French doors are also common. Raised up above the beach, the baches are usually accessed via steps. Many of the baches feature small uncovered decks and concrete porches. There are generally open grassed areas and low informal gardens to the front, which include shrubs, succulents and cabbage trees.

Bach 35 relates strongly to this group in terms of its design, scale, form, materials, texture and location and is a key contributor to the group. It is located towards the northern end of the linear group known as Rotten Row, which faces the beach and the bay with the hills behind. The group of baches of Taylor's Mistake are a well-known landmark in Christchurch as they are a prominent feature of the bay and its popular coastal walk.

ARCHAEOLOGICAL AND SCIENTIFIC SIGNIFICANCE

Archaeological or scientific values that demonstrate or are associated with: the potential to provide information through physical or scientific evidence and understanding about social historical, cultural, spiritual, technological or other values of past events, activities, structures or people.

Bach 35 and its setting are of archaeological significance because they have the potential to provide archaeological evidence relating to past building construction methods and materials, and human activity on the site. There was no known Māori settlement at Taylor's Mistake (Te Onepoto/short beach), but it was likely to have been employed in mahinga kai (food gathering). Baches were developed in the area from the late 19th century.

ASSESSMENT STATEMENT

Bach 35 and its setting are of overall heritage significance to Christchurch, including Banks Peninsula. The bach has historical and social significance as a reflection of aspects of patterns of recreation and leisure in early and mid-20th century New Zealand; for its association with long-standing bach owners the Roberts family; and as part of the Taylor's Mistake bach community – well-known in Christchurch. It has cultural significance for the manner in which it signifies the informal do-it-yourself bach way of life of the early and mid-20th century, the longevity of single family ownership, its connection with surf lifesaving and for its frequent artistic representation. The building has architectural and aesthetic significance as it typifies bach design of the early decades of the 20th century, and the common adaptation and alteration of baches over time. It has technological significance as a vernacular building, reflecting the building techniques and materials of the early and mid-20th century. It has contextual significance on its site and within its setting, for its relationship to the landscape and bay, and for its shared physical characteristics with the landmark group of baches known as Rotten Row, of which it is a key contributor. The bach and its setting are of archaeological significance because they have the potential to provide archaeological evidence relating to past building construction methods and materials, and human activity on the site.

REFERENCES:

R. Cairns; B. Turpin *Guardians of the Mistake: the history of the Taylor's Mistake Surf Life Saving Club 1916-1991*

P. Carpinter; K. Tutty *Taylor's Mistake - Over the Hill for 100 Years: a history of Taylor's Mistake Surf Life Saving Club 1916-2016*

B. Mortlock, *Life History Report. An appendix to The Taylors Mistake Bach Holders Community Assessment*, 1998

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Taylor's Mistake Association files (privately held)

Pers. comm. Janet Abbott

Papers Past website

Births, Deaths and Marriages website

Wises Street Directories (accessed via Ancestry website)

Paul Thompson *The Bach* (1985)

Kevyn Male's *Good Old Kiwi Baches* (2001)

REPORT DATED: 14 OCTOBER 2021

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**CHRISTCHURCH DISTRICT PLAN – SCHEDULED HERITAGE PLACE
HERITAGE ASSESSMENT – STATEMENT OF SIGNIFICANCE
HERITAGE ITEM NUMBER 1421
*BACH AND SETTING - 36 TAYLOR'S MISTAKE BAY,
SCARBOROUGH***



PHOTOGRAPH: G. WRIGHT, 2017

HISTORICAL AND SOCIAL SIGNIFICANCE

Historical and social values that demonstrate or are associated with: a particular person, group, organisation, institution, event, phase or activity; the continuity and/or change of a phase or activity; social, historical, traditional, economic, political or other patterns.

Bach 36 in Rotten Row has historical and social significance as a reflection of patterns of recreation and leisure in mid-20th century New Zealand; for its association with the Eastwick family; and as part of the Taylor's Mistake bach community – well-known in Christchurch.

The largest single concentration of baches at Taylor's Mistake is so-called Rotten Row, a string of 19 baches along the shore on the eastern side of the bay. The first bach in the Row was constructed in 1913 by blacksmith William Stevens. Research to date suggests that this was an early iteration of Bach 32. By 1920 there were a dozen baches in this location. Bach 36 is located towards the northern end of the Row.

The present bach 36 was constructed in 1967 by brothers Kenneth and Noel Eastwick. Their father Henry (Ernie) Eastwick and his brother Hector had purchased the earlier bach on the site in 1960. The Eastwick family have been involved in Taylor's Mistake since Ernie and Hector's father (also Henry) began camping at the bay in the first decade of the 20th century. Henry senior later built Bach 42, which was inherited after his death in 1963 by Ernie and Hector's sister Connie Peak. Many of the Eastwick family have been members of the Taylor's Mistake Surf Life Saving Club. The present bach has had a lot of use by the Eastwick family, with the extended family spending weekends and holidays there over time to the present day.

The 1967 bach replaced an earlier bach on the site - a diminutive timber hut built by Lewis Agassiz before 1920. This earlier bach was occupied during World War II from 11 December 1941 until 18 April 1943, and subsequently owned by Norman Forward.

CULTURAL AND SPIRITUAL SIGNIFICANCE

Cultural and spiritual values that demonstrate or are associated with the distinctive characteristics of a way of life, philosophy, tradition, religion, or other belief, including: the symbolic or commemorative value of the place; significance to Tangata Whenua; and/or associations with an identifiable group and esteemed by this group for its cultural values.

Bach 36 has cultural significance for the manner in which it signifies the informal do-it-yourself bach way of life of the early and mid-20th century, for the longevity of individual family ownership that is part of its history and for the public esteem in which the area is held, as evidenced by its frequent artistic representation. The bach way of life is held to represent values which are quintessentially 'kiwi' representing the New Zealand culture of 'do it yourself' and connecting with the natural environment. The length of time the bach has remained in the ownership of the Eastwick family is a cultural characteristic of several of the baches in the wider Taylor's Mistake group.

One particular aspect of the kiwi bach way of life represented by many of the Taylor's Mistake baches (including Bach 36) is a frequent connection with surf lifesaving. The Taylor's Mistake Surf Lifesaving Club (TMSLC) was formed in 1916 in the first wave of surf club establishment that followed the Edwardian enthusiasm for sea bathing, and has been one of the strongest clubs in New Zealand ever since. The baches at Taylor's have always played a big part in the success of their local surf club, providing a pool from which members are drawn and through which memberships are maintained. The fact that many baches have been owned by the same families through multiple generations has contributed to a distinct family culture at the TMSLC. While the baches have contributed to the well-being of the TMSLC, the relationship has been two-way, and the club has also provided an on-going community focus for bach owners over the last century.

The public esteem for the wider Taylor's Mistake area has been regularly and consistently demonstrated by its representation in the visual media through the years as an archetypal bach community. In the middle decades of the 20th century, the bay was an accessible subject for the 'Canterbury School' of regionalist painters. The most well-known of these paintings is Bill Sutton's *Untitled (Taylor's Mistake)* of the late 1940s. The bay has also been depicted by Francis Shurrock, Rosa Sawtell, Doris Lusk, and Cecil and Elizabeth Kelly. Since the 1980s, nostalgia for and celebration of the traditional bach way of life has seen Taylor's Mistake baches frequently depicted in picture books and other popular media. This exposure has contributed to Taylor's Mistake becoming one of New Zealand's better-known and most iconic beach settlements.

ARCHITECTURAL AND AESTHETIC SIGNIFICANCE

Architectural and aesthetic values that demonstrate or are associated with: a particular style, period or designer, design values, form, scale, colour, texture and material of the place.

Bach 36 has architectural and aesthetic significance as an example of what is now considered a sub-group of New Zealand architecture, the small vernacular dwellings commonly built to serve as baches in the middle years of the 20th century.

Such dwellings were usually owner built and designed without formal plans (or planning), constructed of locally-sourced, affordable or found materials, and often later altered and adapted to suit owners' needs as required. Bach design was usually individual and particular to the site, with design and style reflecting the notions, needs and means of their owners. Many of the first generation of baches were formed from shore-line caves. The remote location of many Taylor's Mistake baches - where most materials had to be carried or boated in - encouraged the use of lightweight materials and whatever was immediately to hand. By mid-century, baches were usually more substantial structures, built of commercial materials such as fibre cement cladding (Fibrolite/Polite), possibly as a result of changing building code

requirements. Although they were more akin to permanent dwellings, these baches resembled their predecessors in so far as they were usually designed by their owners and generally did not follow typical domestic models. Built for an informal lifestyle, they tended to adhere more to a mid-century art deco or modernist-derived aesthetic, with features such as mono-pitch roofs, open-plan layouts and indoor-outdoor flow.

Bach 36 reflects the typology and characteristics of the 'kiwi' bach in its simple forms and materials. It is a typical mid-century fibrolite bach. The bach is two storied, with a deck extending over part of the ground floor, accessed from the second storey via glazed doors. The roof is mono pitched, only very slightly angled. The form is boxy and simple. Windows are timber framed, and a mix of smaller openings with two sets of larger groups of windows meeting on one corner. This results in a high percentage of glazing on the upper floor of the front façade. Stained timber balustrading of the deck appears to be a later addition.

TECHNOLOGICAL AND CRAFTSMANSHIP SIGNIFICANCE

Technological and craftsmanship values that demonstrate or are associated with: the nature and use of materials, finishes and/or technological or constructional methods which were innovative, or of notable quality for the period.

Bach 36 has technological significance as a vernacular building designed and constructed by owners the Eastwick family to meet their requirements, and for its reflection of the building techniques and materials that were being used for baches in the mid-20th century. The rebuild in 1967 followed the trend of building more substantial baches. The use of bought (rather than found) materials may have been a response to building regulations, as noted above, and the availability of materials such as fibrolite enabled larger constructions at less cost than more traditional materials. Fibrolite fell out of favour in the 1970s and 80s¹, and is not found in later alterations to baches.

CONTEXTUAL SIGNIFICANCE

Contextual values that demonstrate or are associated with: a relationship to the environment (constructed and natural), a landscape, setting, group, precinct or streetscape; a degree of consistency in terms of type, scale, form, materials, texture, colour, style and/or detail; recognised landmarks and landscape which are recognised and contribute to the unique identity of the environment.

Bach 36 has contextual significance on its site and within its setting. The contextual significance of the bach is derived partly from its location in the coastal landscape, and partly from its association with the other small scale and informally-built baches of Taylor's Mistake.

Rotten Row is a linear group of baches located on the sandy foreshore behind the Taylor's Mistake beach close to the foot of the steep hills behind and oriented towards the beach and the bay. The majority of baches in this group are single storied, with small footprints. They are characterised by simple roof and window forms, flat/smooth wall cladding (flat sheets of fibrolite) and usually no decorative elements. The baches are additive in nature with gabled roof or skillion roof forms, commonly with lean-to and flat or skillion roofed additions. This group are commonly clad in Fibrolite, weatherboard or corrugated iron, with iron roofs. Paint colours range from neutral beige and brown to green and vibrant blues. Windows usually make up a large proportion of the principal facades to maximise light and views, and are timber framed. Glazed French doors are also common. Raised up above the beach, the baches are usually accessed via steps. Many of the baches feature small uncovered decks and concrete porches. There are generally open grassed areas and low informal gardens to the front, which include shrubs, succulents and cabbage trees.

Bach 36 relates strongly to this group in terms of its design, form, materials, texture and location and is a key contributor to the group. It is differentiated by its two stories but still retains a small scale. It is located towards the northern end of the linear group of baches known as Rotten Row which faces the beach and the bay with the hills behind. The ground rises immediately behind the bach to a row of large macrocarpas. The group of baches of

¹ <https://teara.govt.nz/en/ephemera/38658/fibrolite>

Taylor's Mistake are a well-known landmark in Christchurch as they are a prominent feature of the bay and its popular coastal walk.

ARCHAEOLOGICAL AND SCIENTIFIC SIGNIFICANCE

Archaeological or scientific values that demonstrate or are associated with: the potential to provide information through physical or scientific evidence and understanding about social historical, cultural, spiritual, technological or other values of past events, activities, structures or people.

Bach 36 and its setting are of archaeological significance because they have the potential to provide archaeological evidence relating to past building construction methods and materials, and human activity on the site. There was no known Māori settlement at Taylor's Mistake (Te Onepoto/short beach), but it is likely to have been employed in mahinga kai (food gathering). Baches were developed in the area from the late 19th century.

ASSESSMENT STATEMENT

Bach 36 and its setting are of overall heritage significance to Christchurch, including Banks Peninsula. Bach 36 has historical and social significance as a reflection of aspects of patterns of recreation and leisure in mid-20th century New Zealand; for its association with the Eastwick family; and as part of the Taylor's Mistake bach community – well-known in Christchurch. The bach has cultural significance for the manner in which it signifies the informal do-it-yourself self-sufficient bach way of life of the early and mid-20th century, for the longevity of individual family ownership that is part of its history, for its connections with the TMSLC and for the public esteem in which the area is held as evidenced by its frequent artistic representation. The building has architectural and aesthetic significance as a representative example of the style of larger and more permanent vernacular dwellings commonly built to serve as baches in the middle years of the 20th century. It has technological significance as a vernacular building designed and constructed by owners the Eastwick family to meet their requirements, and for its reflection of the building techniques and materials that were being used for baches in the mid-20th century. It has contextual significance on its site and within its setting, for its relationship to the landscape and bay, and for its shared physical characteristics with the landmark group of baches known as Rotten Row, of which it is a key contributor. The bach and its setting are of archaeological significance because they have the potential to provide archaeological evidence relating to past building construction methods and materials, and human activity on the site.

REFERENCES:

J. Abbott; *The Baches of Taylor's Mistake: Rotten Row* Boulder Bay Press, 2018.

R. Cairns; B. Turpin *Guardians of the Mistake: the history of the Taylor's Mistake Surf Life Saving Club 1916-1991*

P. Carpinter; K. Tutty *Taylor's Mistake - Over the Hill for 100 Years: a history of Taylor's Mistake Surf Life Saving Club 1916-2016*

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Taylor's Mistake Association files (privately held)

Pers. comm. Janet Abbott

Papers Past website

Births, Deaths and Marriages website

Te Ara Encyclopaedia of New Zealand <https://teara.govt.nz>

Wises Street Directories (accessed via Ancestry website)

Paul Thompson *The Bach* (1985)

Kevyn Male's *Good Old Kiwi Baches* (2001)

REPORT DATED: 14 OCTOBER 2021

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PLEASE USE IN CONJUNCTION WITH THE CHRISTCHURCH CITY COUNCIL HERITAGE FILES.

**CHRISTCHURCH DISTRICT PLAN – SCHEDULED HERITAGE PLACE
HERITAGE ASSESSMENT – STATEMENT OF SIGNIFICANCE
HERITAGE ITEM NUMBER 1420
*BACH 37 AND SETTING, ROTTEN ROW, TAYLOR’S
MISTAKE, CHRISTCHURCH***



PHOTOGRAPH: G. WRIGHT, 2017

HISTORICAL AND SOCIAL SIGNIFICANCE

Historical and social values that demonstrate or are associated with: a particular person, group, organisation, institution, event, phase or activity; the continuity and/or change of a phase or activity; social, historical, traditional, economic, political or other patterns.

Bach 37 in Rotten Row has historical and social significance as a reflection of aspects of patterns of recreation and leisure in mid-20th century New Zealand; for its association with long-standing bach owners Bill Shanks and the Bell family; and as part of the Taylor’s Mistake bach community – well-known in Christchurch.

The largest single concentration of baches at Taylor’s Mistake is so-called Rotten Row, a string of nineteen baches arrayed along the shore on the eastern side of the bay. The first bach in the Row was constructed in 1913 by blacksmith William Stevens. Research to date suggests that this was an early iteration of Bach 32. By 1920 there were a dozen baches in this location. Bach 37 is located in the middle of the Row.

Bach 37 was built by William Shanks in c1920, who lived in Spreydon and was a machinist with New Zealand Railways. A number of baches at Taylor’s Mistake were established by railway employees. Shanks maintained his little bach at the Bay for more than 50 years.

In the mid-1970s Shanks sold Bach 37 to his Spreydon neighbours Maurice Bell and his wife Shirley. Maurice Bell was a primary school teacher - serving as the deputy principal of Somerfield School before becoming principal of first Christchurch East and then Addington Schools. The Bell's daughter Roslynne (Ros) has fond memories of summers spent at the bach and she spent much time there as a university student. In 2007 Maurice passed the bach on to Roslynne as a wedding present.¹

CULTURAL AND SPIRITUAL SIGNIFICANCE

Cultural and spiritual values that demonstrate or are associated with the distinctive characteristics of a way of life, philosophy, tradition, religion, or other belief, including: the symbolic or commemorative value of the place; significance to Tangata Whenua; and/or associations with an identifiable group and esteemed by this group for its cultural values.

Bach 37 has cultural significance for the manner in which it signifies the informal self-sufficient bach way of life of the early and mid-20th century, the longevity of individual family ownership that has been part of its existence and for the area's frequent artistic representation. The bach way of life is held to represent values which are quintessentially 'kiwi' representing the New Zealand culture of 'do it yourself' and connecting with the natural environment. The length of time the bach has remained in the ownership of the Shanks, and then the Bell family is a cultural characteristic of several of the baches in the wider Taylor's Mistake group.

The public esteem for the wider Taylor's Mistake area has been regularly and consistently demonstrated by its representation in the visual media through the years as an archetypal bach community. In the middle decades of the 20th century, the bay was an accessible subject for the 'Canterbury School' of regionalist painters. The most well-known of these paintings is Bill Sutton's *Untitled (Taylor's Mistake)* of the late 1940s. The bay has also been depicted by Francis Shurrock, Rosa Sawtell, Doris Lusk, and Cecil and Elizabeth Kelly. Since the 1980s, nostalgia for and celebration of the traditional bach way of life has seen Taylor's Mistake baches frequently depicted in picture books and other popular media. This exposure has contributed to Taylor's Mistake becoming one of New Zealand's better-known and most iconic beach settlements.

ARCHITECTURAL AND AESTHETIC SIGNIFICANCE

Architectural and aesthetic values that demonstrate or are associated with: a particular style, period or designer, design values, form, scale, colour, texture and material of the place.

Bach 37 has architectural and aesthetic significance as an example of what is now considered a sub-group of New Zealand architecture, the small vernacular dwellings commonly built to serve as baches in the middle years of the 20th century.

Such dwellings were usually owner built and designed without formal plans (or planning), constructed of locally-sourced, affordable or found materials, and often later altered and adapted to suit owners' needs as required. Bach design was usually individual and particular to the site, with design and style reflecting the notions, needs and means of their owners. Many of the first generation of baches were formed from shore-line caves. The remote location of many Taylor's Mistake baches - where most materials had to be carried or boated in - encouraged the use of lightweight materials and whatever was immediately to hand. By mid-century, baches were usually more substantial structures, built of commercial materials such as fibre cement cladding (Fibrolite/Polite), possibly as a result of changing building code requirements. Although they were more akin to permanent dwellings, these baches resembled their predecessors in so far as they were usually designed by their owners and generally did not follow typical domestic models. Built for an informal lifestyle, they tended to adhere more to a mid-century art deco or modernist-derived aesthetic, with features such as mono-pitch roofs, open-plan layouts and indoor-outdoor flow.

¹ Pers. comm. Roslynne Bell & Janet Abbott, 2018

Bach 37 reflects the typology and characteristics of the 'kiwi' bach in its simple forms and materials. Constructed c1920, the first part of Bach 37 was a diminutive weatherboard hut with a skillion roof. Before 1930 this had been extended to the east by one room and given a gabled roof – which resulted in a symmetrical 'cottage' appearance. In 1967 a lean-to addition was made to the front with larger windows. The exterior was also reclad in fibrolite at this time, giving the bach its present appearance. An early railway carriage door on the adjacent outhouse is a reminder of the first owner's workplace.

TECHNOLOGICAL AND CRAFTSMANSHIP SIGNIFICANCE

Technological and craftsmanship values that demonstrate or are associated with: the nature and use of materials, finishes and/or technological or constructional methods which were innovative, or of notable quality for the period.

Bach 37 has technological and craftsmanship significance as a vernacular building, reflecting the building techniques and materials of the early and mid-20th century. Bach 37 has technological significance as a vernacular building designed, constructed and altered over time by the Shanks family to meet their requirements, and for its reflection of the building techniques and materials that were being used for baches in the mid-20th century. The changes over time followed the trend of building more substantial baches. The use of bought (rather than found) materials may have been a response to building regulations, as noted above, and the availability of materials such as fibrolite enabled construction at less cost than more traditional materials. Fibrolite fell out of favour in the 1970s and 80s² and is not found in later alterations to the baches, so the bach is very much a product of its time.

CONTEXTUAL SIGNIFICANCE

Contextual values that demonstrate or are associated with: a relationship to the environment (constructed and natural), a landscape, setting, group, precinct or streetscape; a degree of consistency in terms of type, scale, form, materials, texture, colour, style and/or detail; recognised landmarks and landscape which are recognised and contribute to the unique identity of the environment.

Bach 37 has contextual significance on its site and within its setting. The contextual significance of the bach is derived partly from its location in the coastal landscape, and partly from its association with the other small scale and informally-built baches of Taylor's Mistake. The bach is located towards the centre of the linear group of baches known as Rotten Row.

Rotten Row is a linear group of baches located on the sandy foreshore behind the Taylor's Mistake beach close to the foot of the steep hills behind and oriented towards the beach and the bay. The baches in this group are single storied, with small footprints. They are characterised by simple roof and window forms, flat/smooth wall cladding (flat sheets of fibrolite) and usually no decorative elements. The baches are additive in nature with gabled roof or skillion roof forms, commonly with lean-tos and flat or skillion roofed additions. This group are commonly clad in Fibrolite, weatherboard or corrugated iron, with iron roofs. Paint colours range from neutral beige and brown to green and vibrant blues. Windows usually make up a large proportion of the principal facades to maximise light and views, and are timber framed. Glazed French doors are also common. Raised up above the beach, the baches are usually accessed via steps. Many of the baches feature small uncovered decks and concrete porches. There are generally open grassed areas and low informal gardens to the front, which include shrubs, succulents and cabbage trees.

Bach 37 relates strongly to this group in terms of its design, scale, form, materials, texture and location and is a key contributor to the group. The group of baches of Taylor's Mistake are well-known landmark in Christchurch as they are a prominent feature of the bay and its popular coastal walk.

ARCHAEOLOGICAL AND SCIENTIFIC SIGNIFICANCE

² <https://teara.govt.nz/en/ephemera/38658/fibrolite>

Archaeological or scientific values that demonstrate or are associated with: the potential to provide information through physical or scientific evidence and understanding about social historical, cultural, spiritual, technological or other values of past events, activities, structures or people.

Bach 37 and its setting are of archaeological significance because they have the potential to provide archaeological evidence relating to past building construction methods and materials, and human activity on the site. There was no known Maori settlement at Taylor's Mistake (Te Onepoto/short beach), but it was likely to have been employed in mahinga kai (food gathering). Baches were developed in the area from the late 19th century.

ASSESSMENT STATEMENT

Bach 37 and its setting are of overall heritage significance to Christchurch, including Banks Peninsula. The bach has historical and social significance as a reflection of aspects of patterns of recreation and leisure in mid-20th century New Zealand; for its association with long-term owners Bill Shanks and the Bell family; and as part of the well-known Taylor's Mistake bach community. It has cultural significance for the manner in which it signifies the informal do-it-yourself bach way of life of the early and mid-20th century, for the longevity of individual family ownership that is part of its history and for the area's frequent artistic representation. The building has architectural and aesthetic significance as a representative example of the small vernacular dwellings commonly built to serve as baches in the middle years of the 20th century, individual and particular to their sites, and adapted over time. The bach has technological significance as a vernacular building, reflecting the building techniques and materials of the mid-20th century built and adapted by the owner Shanks family to meet their changing requirements over the years. It has contextual significance on its site and within its setting, for its relationship to the landscape and bay, and for its shared physical characteristics with the landmark group of baches known as Rotten Row, of which it is a key contributor. The bach and its setting are of archaeological significance because they have the potential to provide archaeological evidence relating to past building construction methods and materials, and human activity on the site.

REFERENCES:

J. Abbott; *The Baches of Taylor's Mistake: Rotten Row* Boulder Bay Press, 2018.

R. Cairns; B. Turpin *Guardians of the Mistake: the history of the Taylor's Mistake Surf Life Saving Club 1916-1991*

P. Carpinter; K. Tutty *Taylor's Mistake - Over the Hill for 100 Years: a history of Taylor's Mistake Surf Life Saving Club 1916-2016*

B. Mortlock, *Life History Report. An appendix to The Taylors Mistake Bach Holders Community Assessment*, 1998

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Pers. comm. Janet Abbott

Papers Past website

Births, Deaths and Marriages website

Te Ara Encyclopaedia of New Zealand <https://teara.govt.nz>

Wises Street Directories (accessed via Ancestry website)

Paul Thompson *The Bach* (1985)

Kevyn Male's *Good Old Kiwi Baches* (2001)

REPORT DATED: 14 OCTOBER 2021

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**CHRISTCHURCH DISTRICT PLAN – SCHEDULED HERITAGE PLACE
HERITAGE ASSESSMENT – STATEMENT OF SIGNIFICANCE
HERITAGE ITEM NUMBER 1419
*BACH AND SETTING - 38 TAYLOR’S MISTAKE BAY,
SCARBOROUGH***



PHOTOGRAPH: G. WRIGHT, 2017

HISTORICAL AND SOCIAL SIGNIFICANCE

Historical and social values that demonstrate or are associated with: a particular person, group, organisation, institution, event, phase or activity; the continuity and/or change of a phase or activity; social, historical, traditional, economic, political or other patterns.

Bach 38 in Rotten Row has historical and social significance as a reflection of aspects of patterns of recreation and leisure in mid-20th century New Zealand; for its association with the St John Ambulance Association and long-standing bach owners the Stewart family; and as part of the Taylor's Mistake bach community – well-known in Christchurch.

The largest single concentration of baches at Taylor's Mistake is so-called Rotten Row, a string of 19 baches arrayed along the shore on the eastern side of the bay. The first bach in the Row was constructed in 1913 by blacksmith William Stevens. Research to date suggests that this was an early iteration of Bach 32. By 1920 there were a dozen baches in this location. Bach 38 is located in the middle of the Row.

The origins of Bach 38 are uncertain; early photos of Rotten Row (1920-1930) appear to show a very small building on the site, but no owner or function has been determined. In late 1934 the Mayor of Sumner Borough arranged for the site to be granted to the St John Ambulance Association for five years without charge, for the use of their cadets.¹ The license

¹ SBC Minute Book p 395 – 26 November 1934 (Archives New Zealand)

fee exemption continued for the duration of the Association's presence in the Bay. The Association built the hut in c1935.

During World War II many baches were requisitioned by the army and occupied by soldiers; however, Bach 38 was one of the few that was not, and research to date suggests that it was used as a first aid post during this time. St John's maintained its bach until 1949/1950, and then sold it to Mrs Russel of Addington. In the late 1950s, Mrs Russel transferred the bach to Herbert Powell, a dentist from Burwood.

In 1958 David Stewart, wife Betty, and their family rented Bach 38 for a holiday. They stayed again on a number of occasions through to about 1964, but by this time 38 was too small, and they relocated elsewhere at the Bay for a period. In 1966 Powell extended his bach, and the Stewart family resumed renting it annually until the opportunity to purchase it arose in 1978. Betty's brother Noel Chambers also owned Bach 30 in the same period. Dave and sons Graeme and Paul were members of the Waimairi Surf Life Saving Club, and Graeme and Paul would surf in the Bay. The Stewart family continue to holiday at their bach.²

CULTURAL AND SPIRITUAL SIGNIFICANCE

Cultural and spiritual values that demonstrate or are associated with the distinctive characteristics of a way of life, philosophy, tradition, religion, or other belief, including: the symbolic or commemorative value of the place; significance to Tangata Whenua; and/or associations with an identifiable group and esteemed by this group for its cultural values.

Bach 38 has cultural significance for the manner in which it signifies the informal do-it-yourself bach way of life of the early and mid-20th century, the longevity of individual family ownership that has been part of its history and the area's frequent artistic representation. The bach way of life is held to represent values which are quintessentially 'kiwi' representing the New Zealand culture of 'do it yourself' and connecting with the natural environment. Bach 38 is valued by its owners for more than 40 years. The length of time the bach has remained in the ownership of the Stewart family is a cultural characteristic of several of the baches in the wider Taylor's Mistake group.

The public esteem for the wider Taylor's Mistake area has been regularly and consistently demonstrated by its representation in the visual media through the years as an archetypal bach community. In the middle decades of the 20th century, the bay was an accessible subject for the 'Canterbury School' of regionalist painters. The most well-known of these paintings is Bill Sutton's *Untitled (Taylor's Mistake)* of the late 1940s. The bay has also been depicted by Francis Shurrock, Rosa Sawtell, Doris Lusk, and Cecil and Elizabeth Kelly. Since the 1980s, nostalgia for and celebration of the traditional bach way of life has seen Taylor's Mistake baches frequently depicted in picture books and other popular media. This exposure has contributed to Taylor's Mistake becoming one of New Zealand's better-known and most iconic beach settlements.

ARCHITECTURAL AND AESTHETIC SIGNIFICANCE

Architectural and aesthetic values that demonstrate or are associated with: a particular style, period or designer, design values, form, scale, colour, texture and material of the place.

Bach 38 has architectural and aesthetic significance as an example of what is now considered a sub-group of New Zealand architecture, the small vernacular dwellings commonly built to serve as baches in the middle years of the 20th century.

Such dwellings were usually owner built and designed without formal plans (or planning), constructed of locally-sourced, affordable or found materials, and often later altered and adapted to suit owners' needs as required. Bach design was usually individual and particular to the site, with design and style reflecting the notions, needs and means of their owners. Many of the first generation of baches were formed from shore-line caves. The remote location of many Taylor's Mistake baches - where most materials had to be carried or boated

² Pers. comm. Janet Abbott with Graham & Paul Stewart, 2018

in - encouraged the use of lightweight materials and whatever was immediately to hand. By mid-century, baches were usually more substantial structures, built of commercial materials such as fibre cement cladding (Fibrolite/Polite), possibly as a result of changing building code requirements. Although they were more akin to permanent dwellings, these baches resembled their predecessors in so far as they were usually designed by their owners and generally did not follow typical domestic models. Built for an informal lifestyle, they tended to adhere more to a mid-century art deco or modernist-derived aesthetic, with features such as mono-pitch roofs, open-plan layouts and indoor-outdoor flow.

Bach 38 reflects the typology and characteristics of the 'kiwi' bach in its simple forms and materials. Constructed for St John's in c1935, Bach 38 began as a small hut with a mono-pitch roof. Before the end of the 1950s, it was extended length-wise. The building took on its present appearance when another space was added across the full length of the frontage in 1966. This is characteristic of the period, with a wide sliding glazed door, extensive windows and a deck. The building has a low pitched gable roof.

TECHNOLOGICAL AND CRAFTSMANSHIP SIGNIFICANCE

Technological and craftsmanship values that demonstrate or are associated with: the nature and use of materials, finishes and/or technological or constructional methods which were innovative, or of notable quality for the period.

Bach 38 has technological and craftsmanship significance as a vernacular building, reflecting the building techniques and materials of the early and mid-20th century. Bach 38 has technological significance as a vernacular building constructed and altered over time by its occupants to meet their requirements, and for its reflection of the building techniques and materials that were being used for baches in the mid-20th century. The changes over time followed the trend of building more substantial baches. The use of bought (rather than found) materials may have been a response to building regulations, as noted above, and the availability of materials such as fibrolite, which could be easily flat packed and carted, enabled construction at less cost than more traditional materials. Fibrolite fell out of favour in the 1970s and 80s³, and is not found in later alterations to the baches, so the bach is very much a product of its time. Part of the building is clad in corrugated iron.

CONTEXTUAL SIGNIFICANCE

Contextual values that demonstrate or are associated with: a relationship to the environment (constructed and natural), a landscape, setting, group, precinct or streetscape; a degree of consistency in terms of type, scale, form, materials, texture, colour, style and/or detail; recognised landmarks and landscape which are recognised and contribute to the unique identity of the environment.

Bach 38 has contextual significance on its site and within its setting. The contextual significance of the bach is derived partly from its location in the coastal landscape, and partly from its association with the other small scale and informally-built baches of Taylor's Mistake.

Rotten Row is a linear group of baches located on the sandy foreshore behind the Taylor's Mistake beach close to the foot of the steep hills behind and oriented towards the beach and the bay. The majority of baches in this group are single storied, with small footprints. They are characterised by simple roof and window forms, flat/smooth wall cladding (flat sheets of fibrolite) and usually no decorative elements. The baches are additive in nature with gabled roof or skillion roof forms, commonly with lean-tos and flat or skillion roofed additions. This group are commonly clad in Fibrolite, weatherboard or corrugated iron, with iron roofs. Paint colours range from neutral beige and brown to green and vibrant blues. Windows usually make up a large proportion of the principal facades to maximise light and views, and are timber framed. Glazed French doors are also common. Raised up above the beach, the baches are usually accessed via steps. Many of the baches feature small uncovered decks and concrete porches. There are generally open grassed areas and low informal gardens to the front, which include shrubs, succulents and cabbage trees.

³ <https://teara.govt.nz/en/ephemera/38658/fibrolite>

Bach 38 relates strongly to this group in terms of its design, scale, form, materials, texture and location and is a key contributor to the group. It is located towards the middle of the linear group of baches known as Rotten Row. The group of baches of Taylor's Mistake are well-known landmark in Christchurch as they are a prominent feature of the bay and its popular coastal walk.

ARCHAEOLOGICAL AND SCIENTIFIC SIGNIFICANCE

Archaeological or scientific values that demonstrate or are associated with: the potential to provide information through physical or scientific evidence and understanding about social historical, cultural, spiritual, technological or other values of past events, activities, structures or people.

Bach 38 and its setting are of archaeological significance because they have the potential to provide archaeological evidence relating to past building construction methods and materials, and human activity on the site. There was no known Māori settlement at Taylor's Mistake (Te Onepoto/short beach), but it is likely to have been employed in mahinga kai (food gathering). Baches were developed in the area from the late 19th century.

ASSESSMENT STATEMENT

Bach 38 and its setting are of overall heritage significance to Christchurch, including Banks Peninsula. The bach has historical and social significance as a reflection of aspects of patterns of recreation and leisure in mid-20th century New Zealand; for its connection with the St John Ambulance Association and long-standing bach owners the Stewart family; and as part of the Taylor's Mistake bach community – well-known in Christchurch. It has cultural significance for the manner in which it signifies the informal do-it-yourself bach way of life of the early and mid-20th century, the longevity of family ownership associated with it, and for the areas frequent artistic representation. The building has architectural and aesthetic significance as a representative example of the small vernacular dwellings commonly built to serve as baches in the middle years of the 20th century, individual and particular to their sites, and altered over time. The bach has technological significance as a vernacular building, reflecting the building techniques and materials of the mid-20th century. It has contextual significance on its site and within its setting, for its relationship to the landscape and bay, and for its shared physical characteristics with the landmark group of baches known as Rotten Row, of which it is a key contributor. The bach and its setting are of archaeological significance because they have the potential to provide archaeological evidence relating to past building construction methods and materials, and human activity on the site.

REFERENCES:

J. Abbott; *The Baches of Taylor's Mistake: Rotten Row* Boulder Bay Press, 2018.

R. Cairns; B. Turpin *Guardians of the Mistake: the history of the Taylor's Mistake Surf Life Saving Club 1916-1991*

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Taylor's Mistake Association files (privately held)

Pers. comm. Janet Abbott

Births, Deaths and Marriages website

Papers Past website

Te Ara Encyclopaedia of New Zealand <https://teara.govt.nz>

Wises Street Directories (accessed via Ancestry website)

Paul Thompson *The Bach* (1985)

Kevyn Male's *Good Old Kiwi Baches* (2001)

REPORT DATED: 14 OCTOBER 2021

PLEASE NOTE THIS ASSESSMENT IS BASED ON INFORMATION AVAILABLE AT THE TIME OF WRITING. DUE TO THE ONGOING NATURE OF HERITAGE RESEARCH, FUTURE REASSESSMENT OF THIS HERITAGE ITEM MAY BE NECESSARY TO REFLECT ANY CHANGES IN KNOWLEDGE AND UNDERSTANDING OF ITS HERITAGE SIGNIFICANCE.

PLEASE USE IN CONJUNCTION WITH THE CHRISTCHURCH CITY COUNCIL HERITAGE FILES.

**CHRISTCHURCH DISTRICT PLAN – SCHEDULED HERITAGE PLACE
HERITAGE ASSESSMENT – STATEMENT OF SIGNIFICANCE
HERITAGE ITEM NUMBER 1418
*BACH AND SETTING - 39 TAYLOR'S MISTAKE BAY,
SCARBOROUGH***



PHOTOGRAPH: G. WRIGHT, 2017

HISTORICAL AND SOCIAL SIGNIFICANCE

Historical and social values that demonstrate or are associated with: a particular person, group, organisation, institution, event, phase or activity; the continuity and/or change of a phase or activity; social, historical, traditional, economic, political or other patterns.

Bach 39 in Rotten Row has historical and social significance as a reflection of aspects of patterns of recreation and leisure in mid-20th century New Zealand; for its association with long-standing bay families, the Hazletons, Campbells and Scotts; and as part of the Taylor's Mistake bach community – well-known in Christchurch.

The largest single concentration of baches at Taylor's Mistake is so-called Rotten Row, a string of 19 baches arrayed along the shore on the eastern side of the bay. The first bach in the Row was constructed in 1913 by blacksmith William Stevens. Research to date suggests that this was an early iteration of Bach 32. By 1920 there were a dozen baches in this location. Bach 39 is located in the middle of the Row.

Evidence suggests that Bach 39 was constructed by Alexander Hazleton and his brother-in-law Walter Campbell in c1919 using the timber from a demolished colonial homestead in Waltham. Alex was a foundation member of the Taylor's Mistake Surf Life Saving Association (TMSLC) in 1916, and served on the committee until he was transferred to Wellington in the

early 1920s. In the early 1930s Alex retired from the civil service and returned to Christchurch to take up a position in his wife's family business, John Brightling Ltd, cartage contractors.

Alex appears to have retained his bach at the Bay until about 1941, when it was transferred to May and Walter Campbell, who had also been using it since the 1920s. Walter was a participant in the first recorded rescue at Taylor's Mistake on Boxing Day 1915 and was also a foundation member of the TMSLC.

During World War II Bach 39 was one of the baches requisitioned by the army. Walter died soon after regaining the bach in December 1942. May assumed ownership and retained and used Bach 39 for another 20 years. The bach was also borrowed by their good friends Margaret and Barbara Carter (known collectively as 'The Girls') who became Taylor's Mistake identities, living together at Bach 33 for over 50 years. Bach 39 was little used in later years and fell into some disrepair. In 1963 it was transferred to Ian and Sarah (Sadie) Scott, who had family connections with the Rotten Row baches. Ian and Sadie had a large family and undertook substantial additions and alterations in 1965, with Ian, the building supervisor at Maurice Carter Homes, carrying out the work himself.

Four of the Scott brothers took over the bach from their parents, and sold it to the present owners in 2013, who are involved with the TMSLC and the Taylor's Mistake Association.

CULTURAL AND SPIRITUAL SIGNIFICANCE

Cultural and spiritual values that demonstrate or are associated with the distinctive characteristics of a way of life, philosophy, tradition, religion, or other belief, including: the symbolic or commemorative value of the place; significance to Tangata Whenua; and/or associations with an identifiable group and esteemed by this group for its cultural values.

Bach 39 has cultural significance for the manner in which it signifies the informal self-sufficient bach way of life of the early and mid-20th century, the longevity of family ownership that has been part of its history and for the area's frequent artistic representation. The bach way of life is held to represent values which are quintessentially 'kiwi' representing the New Zealand culture of 'do it yourself' and connecting with the natural environment. Bach 39 is valued by its present owners who have owned it for nearly a decade, while the length of time it remained in the ownership of the Scott family is a cultural characteristic of several of the baches in the wider Taylor's Mistake group.

One particular aspect of the kiwi bach way of life represented by many of the Taylor's Mistake baches (including Bach 39) is a connection with surf lifesaving – a recreation which has played a pivotal role in fostering beach and bach culture. The Taylor's Mistake Surf Lifesaving Club (TMSLC) was formed in 1916 in the first wave of surf club establishment that followed the Edwardian enthusiasm for sea bathing, and has been one of the strongest clubs in New Zealand ever since. The club's biggest annual event is the Kesteven Cup, held regularly since 1918. The baches at Taylor's have always played a big part in the success of their local surf club, providing a pool from which members are drawn and through which memberships are maintained. The fact that many baches have been owned by the same families through multiple generations has contributed to a distinct family culture at the TMSLC. While the baches have contributed to the well-being of the TMSLC, the relationship has been two-way, and the club has also provided an on-going community focus for bach owners over the last century.

The public esteem for the wider Taylor's Mistake area has been regularly and consistently demonstrated by its representation in the visual media through the years as an archetypal bach community. In the middle decades of the 20th century, the bay was an accessible subject for the 'Canterbury School' of regionalist painters. The most well-known of these paintings is Bill Sutton's *Untitled (Taylor's Mistake)* of the late 1940s. The bay has also been depicted by Francis Shurrock, Rosa Sawtell, Doris Lusk, and Cecil and Elizabeth Kelly. Since the 1980s, nostalgia for and celebration of the traditional bach way of life has seen Taylor's Mistake baches frequently depicted in picture books and other popular media. This exposure has contributed to Taylor's Mistake becoming one of New Zealand's better-known and most iconic beach settlements.

ARCHITECTURAL AND AESTHETIC SIGNIFICANCE

Architectural and aesthetic values that demonstrate or are associated with: a particular style, period or designer, design values, form, scale, colour, texture and material of the place.

Bach 39 has architectural and aesthetic significance as a representative example of what is now considered a distinctive sub-group of New Zealand architecture, the small vernacular dwellings commonly built (and often subsequently altered) to serve as baches in the early and middle years of the 20th century.

Such dwellings were usually owner built and designed without formal plans (or planning), constructed of locally-sourced, affordable or found materials, and often later altered and adapted to suit owners' needs as required. Bach design was usually individual and particular to the site, with design and style reflecting the notions, needs and means of their owners. Many of the first generation of baches were formed from shore-line caves. The remote location of many Taylor's Mistake baches - where most materials had to be carried or boated in - encouraged the use of lightweight materials and whatever was immediately to hand. By mid-century, baches were usually more substantial structures, built of commercial materials such as fibre cement cladding (Fibrolite/Polite), possibly as a result of changing building code requirements. Although they were more akin to permanent dwellings, these baches resembled their predecessors in so far as they were usually designed by their owners and generally did not follow typical domestic models. Built for an informal lifestyle, they tended to adhere more to a mid-century art deco or modernist-derived aesthetic, with features such as mono-pitch roofs, open-plan layouts and indoor-outdoor flow.

Bach 39 reflects the typology and characteristics of the 'kiwi' bach in its simple forms and materials. Built in c.1919, Bach 39 began (as did most the Rotten Row baches) as a diminutive lean-to weatherboard hut of one or two rooms, constructed of salvaged materials. Until the Scott family took over in the 1960s, the red-painted bach was virtually unaltered – and after 45 years, in poor condition. The Scotts altered and enlarged the bach significantly in 1965, adding a large gabled beach-facing living room at right angles to the original hut – a design strategy pursued by a number of Rotten Row bach owners. This more than doubled the bach's floor area. The whole building was clad in fibre-cement panel at this time. The roof is corrugated iron and the windows are timber framed. The bach sustained some damage in the Canterbury Earthquake sequence of 2010-2011, and has been subsequently re-clad like-for-like.

TECHNOLOGICAL AND CRAFTSMANSHIP SIGNIFICANCE

Technological and craftsmanship values that demonstrate or are associated with: the nature and use of materials, finishes and/or technological or constructional methods which were innovative, or of notable quality for the period.

Bach 39 has technological significance as a vernacular building constructed and altered over time by its occupants to meet their requirements, and for its reflection of the building techniques and materials that were being used for baches in the mid-20th century. The changes over time followed the trend of building more substantial baches. The use of bought (rather than found) materials may have been a response to building regulations, as noted above, and the availability of materials such as fibrolite, which could be easily flat packed and carted, enabled construction at less cost than more traditional materials. Fibrolite fell out of favour in the 1970s and 80s¹ and is not found in later alterations to baches. The re-cladding of the bach following the Canterbury earthquakes has used a modern, safe version of this cladding material. The timber windows and corrugated iron roof are standard materials for baches of the period.

CONTEXTUAL SIGNIFICANCE

Contextual values that demonstrate or are associated with: a relationship to the environment (constructed and natural), a landscape, setting, group, precinct or streetscape; a degree of

¹ <https://teara.govt.nz/en/ephemera/38658/fibrolite>

consistency in terms of type, scale, form, materials, texture, colour, style and/or detail; recognised landmarks and landscape which are recognised and contribute to the unique identity of the environment.

Bach 39 has contextual significance on its site and within its setting. The contextual significance of the bach is derived partly from its location in the coastal landscape, and partly from its association with the other small scale and informally-built baches of Taylor's Mistake.

Rotten Row is a linear group of baches located on the sandy foreshore behind the Taylor's Mistake beach close to the foot of the steep hills behind and oriented towards the beach and the bay. The baches in this group are single storied, with small footprints. They are characterised by simple roof and window forms, flat/smooth wall cladding (flat sheets of fibrolite) and usually no decorative elements. The baches are additive in nature with gabled roof or skillion roof forms, commonly with lean-tos and flat or skillion roofed additions. This group are commonly clad in Fibrolite, weatherboard or corrugated iron, with iron roofs. Paint colours range from neutral beige and brown to green and vibrant blues. Windows usually make up a large proportion of the principal facades to maximise light and views, and are timber framed. Glazed French doors are also common. Raised up above the beach, the baches are usually accessed via steps. Many of the baches feature small uncovered decks and concrete porches. There are generally open grassed areas and low informal gardens to the front, which include shrubs, succulents and cabbage trees.

Bach 39 relates strongly to this group in terms of its design, scale, form, materials, texture and location and is a key contributor to the group. It is in the middle of the linear group of baches known as Rotten Row. The group of baches of Taylor's Mistake are well-known landmark in Christchurch as they are a prominent feature of the bay and its popular coastal walk.

ARCHAEOLOGICAL AND SCIENTIFIC SIGNIFICANCE

Archaeological or scientific values that demonstrate or are associated with: the potential to provide information through physical or scientific evidence and understanding about social historical, cultural, spiritual, technological or other values of past events, activities, structures or people.

Bach 39 and its setting are of archaeological significance because they have the potential to provide archaeological evidence relating to past building construction methods and materials, and human activity on the site. There was no known Māori settlement at Taylor's Mistake (Te Onepoto/short beach), but it was likely to have been employed in mahinga kai (food gathering). Baches were developed in the area from the late 19th century.

ASSESSMENT STATEMENT

Bach 39 and its setting are of overall heritage significance to Christchurch, including Banks Peninsula. The bach has historical and social significance as a reflection of aspects of patterns of recreation and leisure in mid-twentieth century New Zealand; for its connection with long-standing Bay families the Hazletons, Campbells and Scotts; and as part of the Taylor's Mistake bach community – well-known in Christchurch. It has cultural significance for the manner in which it signifies the informal self-sufficient bach way of life of the early and mid-20th century, for the longevity of individual family ownership within its history, connection with surf lifesaving and for the area's frequent artistic representation. The building has architectural and aesthetic significance as a representative example of the small vernacular dwellings commonly built to serve as baches in the middle years of the 20th century, individual and particular to their sites, and altered over time. The bach has technological significance as a vernacular building, reflecting the building techniques and materials of the mid-20th century. It has contextual significance on its site and within its setting, for its relationship to the landscape and bay, and for its shared physical characteristics with the landmark group of baches known as Rotten Row, of which it is a key contributor. The bach and its setting are of archaeological significance because they have the potential to provide archaeological evidence relating to past building construction methods and materials, and human activity on the site.

REFERENCES:

J. Abbott; *The Baches of Taylor's Mistake: Rotten Row* Boulder Bay Press, 2018.

R. Cairns; B. Turpin *Guardians of the Mistake: the history of the Taylor's Mistake Surf Life Saving Club 1916-1991*

P. Carpinter; K. Tutty *Taylor's Mistake - Over the Hill for 100 Years: a history of Taylor's Mistake Surf Life Saving Club 1916-2016*

B. Mortlock, *Life History Report. An appendix to The Taylors Mistake Bach Holders Community Assessment*, 1998

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Paul Thompson *The Bach* (1985)

Kevyn Male's *Good Old Kiwi Baches* (2001)

REPORT DATED: 14 OCTOBER 2021

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**CHRISTCHURCH DISTRICT PLAN – SCHEDULED HERITAGE PLACE
HERITAGE ASSESSMENT – STATEMENT OF SIGNIFICANCE
HERITAGE ITEM NUMBER 1417
*BACH AND SETTING - 40 TAYLOR'S MISTAKE BAY,
SCARBOROUGH***



PHOTOGRAPH: G. WRIGHT, 2017

HISTORICAL AND SOCIAL SIGNIFICANCE

Historical and social values that demonstrate or are associated with: a particular person, group, organisation, institution, event, phase or activity; the continuity and/or change of a phase or activity; social, historical, traditional, economic, political or other patterns.

Bach 40 in Rotten Row has historical and social significance as a reflection of aspects of patterns of recreation and leisure in mid-20th century New Zealand; for its association with long-standing bay families, the Langes and Goldsmiths; and as part of the Taylor's Mistake bach community – well-known in Christchurch.

The largest single concentration of baches at Taylor's Mistake is so-called Rotten Row, a string of 19 baches arrayed along the shore on the eastern side of the bay. The first bach in the Row was constructed in 1913 by blacksmith William Stevens. Research to date suggests that this was an early iteration of Bach 32. By 1920 there were a dozen baches in this location. Bach 40 is in the southern end of the Row.

Bach 40 was built in c.1919 by Charles Lange, with assistance from his cousins Phillip and Carl Kortegast. Charles Lange worked as an hotelier, and from 1920 ran a tobacconist shop. In 1916 or 1917 Lange became an early member of the Taylor's Mistake Life Saving Club (TMSLC), serving as secretary in 1917 and vice-president in 1919. Research suggests this was Lange's second bach in the Bay and that he had previously owned a hut on a different site. During World War II when many of the baches – including 40 - were requisitioned by the

army several baches sustained damage during a live firing exercise. Bach 40 was tabulated as '1 window broken, 1 shrapnell (sic) mark'. Lange regained his bach in mid-1943.¹

After the war, Charles Lange transferred² his bach to Henry (Harry) Goldsmith. The Goldsmith family came to Auckland from Sydney in 1933. In 1936 they moved down to Christchurch. Harry had been a member of the North Bondi Surf Life Saving Club, and on arriving in Christchurch he joined the CUSC and the TMSLC, where he quickly made a mark. While still an active member of the TMSLC as both a competitor and life saver, Goldsmith took up administration at club and provincial levels, serving as club captain (1945-1948), club president (1960-1967) and Canterbury Surf Life Saving's treasurer (1945-58). He was awarded with life memberships of the TMSLC (in 1966) and the CSLS, and received a Distinguished Award for his contribution from Surf Life Saving New Zealand. When Harry passed away at the age of 94 in 2013, he had been a TMSLC member for 77 years.

Before the war, Harry worked as a book keeper with brewers and soft drink manufacturers Ballin Bros, who figure large in the early history of the TMSLC. After the war, Harry went to work for Charles Lange, the previous owner of Bach 40. As well as being an acquaintance of Lange's from both the CUSC and the TMSLC, Harry had been best friends with his nephew Stan Kingdon and married Stan's sister Pearl. Harry and Pearl's children and grandchildren have continued the family involvement with the TMSLC, and still holiday at Bach 40.

CULTURAL AND SPIRITUAL SIGNIFICANCE

Cultural and spiritual values that demonstrate or are associated with the distinctive characteristics of a way of life, philosophy, tradition, religion, or other belief, including: the symbolic or commemorative value of the place; significance to Tangata Whenua; and/or associations with an identifiable group and esteemed by this group for its cultural values.

Bach 40 has cultural significance for the manner in which it signifies the informal do-it-yourself bach way of life of the early and mid-20th century, for the longevity of individual family ownership throughout the bach's history and for the area's frequent artistic representation. The bach way of life is held to represent values which are quintessentially 'kiwi' representing the New Zealand culture of 'do it yourself' and connecting with the natural environment. Bach 40 is valued by its present occupants, whose family have had a connection with it since it was constructed nearly a century ago.

One particular aspect of the kiwi bach way of life represented by many of the Taylor's Mistake baches (including Bach 40) is a connection with surf lifesaving – a recreation which has played a pivotal role in fostering beach and bach culture. The Taylor's Mistake Surf Lifesaving Club (TMSLC) was formed in 1916 in the first wave of surf club establishment that followed the Edwardian enthusiasm for sea bathing, and has been one of the strongest clubs in New Zealand ever since. The club's biggest annual event is the Kesteven Cup, held regularly since 1918. The baches at Taylor's have always played a big part in the success of their local surf club, providing a pool from which members are drawn and through which memberships are maintained. The fact that many baches have been owned by the same families through multiple generations has contributed to a distinct family culture at the TMSLC. While the baches have contributed to the well-being of the TMSLC, the relationship has been two-way, and the club has also provided an on-going community focus for bach owners over the last century.

The public esteem for the wider Taylor's Mistake area has been regularly and consistently demonstrated by its representation in the visual media through the years as an archetypal bach community. In the middle decades of the 20th century, the bay was an accessible subject for the 'Canterbury School' of regionalist painters. The most well-known of these paintings is Bill Sutton's *Untitled (Taylor's Mistake)* of the late 1940s. The bay has also been depicted by Francis Shurrock, Rosa Sawtell, Doris Lusk, and Cecil and Elizabeth Kelly. Since the 1980s, nostalgia for and celebration of the traditional bach way of life has seen Taylor's

¹ Taylor's Mistake Hut occupation records, NZ Army (held by TMA).

² Formal application was made to the Sumner BC for changing ownership in the form of a 'transfer' – it is unknown whether money changed hands.

Mistake baches frequently depicted in picture books and other popular media. This exposure has contributed to Taylor's Mistake becoming one of New Zealand's better-known and most iconic beach settlements.

ARCHITECTURAL AND AESTHETIC SIGNIFICANCE

Architectural and aesthetic values that demonstrate or are associated with: a particular style, period or designer, design values, form, scale, colour, texture and material of the place.

Bach 40 has architectural and aesthetic significance as a representative example of what is now considered a distinctive sub-group of New Zealand architecture, the small vernacular dwellings commonly built (and often subsequently altered) to serve as baches in the early and middle years of the 20th century.

Such dwellings were usually owner built and designed without formal plans (or planning), constructed of locally-sourced, affordable or found materials, and often later altered and adapted to suit owners' needs as required. Bach design was usually individual and particular to the site, with design and style reflecting the notions, needs and means of their owners. Many of the first generation of baches were formed from shore-line caves. The remote location of many Taylor's Mistake baches - where most materials had to be carried or boated in - encouraged the use of lightweight materials and whatever was immediately to hand. By mid-century, baches were usually more substantial structures, built of commercial materials such as fibre cement cladding (Fibrolite/Polite), possibly as a result of changing building code requirements. Although they were more akin to permanent dwellings, these baches resembled their predecessors in so far as they were usually designed by their owners and generally did not follow typical domestic models. Built for an informal lifestyle, they tended to adhere more to a mid-century art deco or modernist-derived aesthetic, with features such as mono-pitch roofs, open-plan layouts and indoor-outdoor flow.

Bach 40 reflects the typology and characteristics of the 'kiwi' bach in its simple forms and materials. Built in c1919, Bach 40 began (as did most the Rotten Row baches) as a diminutive lean-to hut of one or two rooms. Between 1930 and 1940, the bach appears to have been extended at least twice: firstly an additional space to the east (side) under an extension of the skillion roof; and then an additional room on the north (front). Finally in 1963, a gabled room was added at right angles to the original bach. The whole building was clad in fibre cement sheet at this time. Further alteration was undertaken in 1969.

TECHNOLOGICAL AND CRAFTSMANSHIP SIGNIFICANCE

Technological and craftsmanship values that demonstrate or are associated with: the nature and use of materials, finishes and/or technological or constructional methods which were innovative, or of notable quality for the period.

Bach 40 has technological and craftsmanship significance as a vernacular building constructed and altered over time by its occupants to meet their requirements, and for its reflection of the building techniques and materials of the early and mid-20th century. The changes over time followed the trend of building more substantial baches. The use of bought (rather than found) materials may have been a response to building regulations, as noted above, and the availability of materials such as fibrolite, which could be easily flat packed and carted, enabled construction at less cost than more traditional materials. Fibrolite fell out of favour in the 1970s and 80s³ and is not found in later alterations to baches.

CONTEXTUAL SIGNIFICANCE

Contextual values that demonstrate or are associated with: a relationship to the environment (constructed and natural), a landscape, setting, group, precinct or streetscape; a degree of consistency in terms of type, scale, form, materials, texture, colour, style and/or detail; recognised landmarks and landscape which are recognised and contribute to the unique identity of the environment.

³ <https://teara.govt.nz/en/ephemera/38658/fibrolite>

Bach 40 has contextual significance on its site and within its setting. The contextual significance of the bach is derived partly from its location in the coastal landscape, and partly from its association with the other small scale and informally-built baches of Taylor's Mistake.

Rotten Row is a linear group of baches located on the sandy foreshore behind the Taylor's Mistake beach close to the foot of the steep hills behind and oriented towards the beach and the bay. The baches in this group are single storied, with small footprints. They are characterised by simple roof and window forms, flat/smooth wall cladding (flat sheets of fibrolite) and usually no decorative elements. The baches are additive in nature with gabled roof or skillion roof forms, commonly with lean-tos and flat or skillion roofed additions. This group are commonly clad in Fibrolite, weatherboard or corrugated iron, with iron roofs. Paint colours range from neutral beige and brown to green and vibrant blues. Windows usually make up a large proportion of the principal facades to maximise light and views, and are timber framed. Glazed French doors are also common. Raised up above the beach, the baches are usually accessed via steps. Many of the baches feature small uncovered decks and concrete porches. There are generally open grassed areas and low informal gardens to the front, which include shrubs, succulents and cabbage trees.

Bach 40 relates strongly to this group in terms of its design, scale, form, materials, texture and location and is a key contributor to the group. It is located towards the southern end of the linear group of baches known as Rotten Row. The group of baches of Taylor's Mistake are well-known landmark in Christchurch as they are a prominent feature of the bay and its popular coastal walk.

ARCHAEOLOGICAL AND SCIENTIFIC SIGNIFICANCE

Archaeological or scientific values that demonstrate or are associated with: the potential to provide information through physical or scientific evidence and understanding about social historical, cultural, spiritual, technological or other values of past events, activities, structures or people.

Bach 40 and its setting are of archaeological significance because they have the potential to provide archaeological evidence relating to past building construction methods and materials, and human activity on the site. There was no known Māori settlement at Taylor's Mistake (Te Onepoto/short beach), but it was likely to have been employed in mahinga kai (food gathering). Baches were developed in the area from the late 19th century.

ASSESSMENT STATEMENT

Bach 40 and its setting are of overall heritage significance to Christchurch, including Banks Peninsula. The bach has historical and social significance as a reflection of aspects of patterns of recreation and leisure in mid-20th century New Zealand; for its connection with long-standing Bay families the Langes and Goldsmiths; and as part of the Taylor's Mistake bach community – well-known in Christchurch. It has cultural significance for the manner in which it signifies the informal do-it-yourself bach way of life of the early and mid-20th century, for the longevity of individual family ownership, its strong connection to surf lifesaving and for the area's frequent artistic representation. The building has architectural and aesthetic significance as a representative example of the small vernacular dwellings commonly built to serve as baches in the middle years of the 20th century, individual and particular to their sites, and altered over time. The bach has technological significance as a vernacular building, reflecting the building techniques and materials of the mid-20th century. It has contextual significance on its site and within its setting, for its relationship to the landscape and bay, and for its shared physical characteristics with the landmark group of baches known as Rotten Row, of which it is a key contributor. The building and its setting are of archaeological significance because they have the potential to provide archaeological evidence relating to past building construction methods and materials, and human activity on the site.

REFERENCES:

J. Abbott; *The Baches of Taylor's Mistake: Rotten Row* Boulder Bay Press, 2018.

R. Cairns; B. Turpin *Guardians of the Mistake: the history of the Taylor's Mistake Surf Life Saving Club 1916-1991*

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**CHRISTCHURCH DISTRICT PLAN – SCHEDULED HERITAGE PLACE
HERITAGE ASSESSMENT – STATEMENT OF SIGNIFICANCE
HERITAGE ITEM NUMBER 1416
*BACH AND SETTING - 41 TAYLOR'S MISTAKE BAY,
SCARBOROUGH***



PHOTOGRAPH: G. WRIGHT, 2017

HISTORICAL AND SOCIAL SIGNIFICANCE

Historical and social values that demonstrate or are associated with: a particular person, group, organisation, institution, event, phase or activity; the continuity and/or change of a phase or activity; social, historical, traditional, economic, political or other patterns.

Bach 41 in Rotten Row has historical and social significance as a reflection of aspects of patterns of recreation and leisure in mid-twentieth century New Zealand; for its association with World War I veteran Edward Lewis and long-standing bay families, the Steads and the Turpins; and as part of the Taylor's Mistake bach community – well-known in Christchurch.

The largest single concentration of baches at Taylor's Mistake is so-called Rotten Row, a string of 19 baches arrayed along the shore on the eastern side of the bay. The first bach in the Row was constructed in 1913 by blacksmith William Stevens. Research to date suggests that this was an early iteration of Bach 32. By 1920 there were a dozen baches in this location. Bach 41 is located towards the southern end of the Row.

Evidence suggests that the first part of Bach 41 was built by Edward Lewis at some point between 1910 and 1915. Lewis was born in Wales and emigrated to New Zealand around the turn of the century. He served on the Western Front during 1917, but was discharged early in 1918 due to illness. On his return to Christchurch, he was given a 'hearty reception' by his Sumner and Taylor's Mistake friends.¹ He died at Diamond Harbour in 1960. Lewis was still the owner of Bach 41 in 1932, but by World War II it was in the possession of Myrtle Forward.

¹ *Star* 19 March 1918.

Mrs Forward was the mother of motor dealer Norman Forward who owned Bach 64 at this time, and who later had Bach 30.

In the 1950s Mrs Forward sold her bach to Frederick Ward who in turn sold the bach in the early 1960s to Leo Stead and his wife Lily. The Steads became involved with the TMSLC. Two sons served as club captains – Peter (1956-1960) and John (1964-1969) - and were instrumental in the development of the club's surf boating wing.

By the 1970s the Steads were using Bach 41 less, and it was frequently let to TMSLC stalwarts Jim Turpin and Brian Rattray. When Mrs Stead decided to sell the bach in 1976, she offered it to Jim and Brian, and Jim purchased it. The Turpin family have been closely involved with the TMSLC since its inception in 1916 - Jim's Uncle Ollie was a foundation member. Jim himself is a life member, having been a member since the 1950s, and serving variously as president, treasurer (for 30 years), and (currently) club patron. Jim's wife June won several national surf life-saving titles and has also made a significant contribution to the club over the decades. The Turpins continue to holiday at their bach.

CULTURAL AND SPIRITUAL SIGNIFICANCE

Cultural and spiritual values that demonstrate or are associated with the distinctive characteristics of a way of life, philosophy, tradition, religion, or other belief, including: the symbolic or commemorative value of the place; significance to Tangata Whenua; and/or associations with an identifiable group and esteemed by this group for its cultural values.

Bach 41 has cultural significance for the manner in which it signifies the informal self-sufficient bach way of life of the early and mid-20th century, for the longevity of family ownership that is part of its history, and for the area's frequent artistic representation. The bach way of life is held to represent values which are quintessentially 'kiwi' representing the New Zealand culture of 'do it yourself' and connecting with the natural environment. Bach 41 is valued by its owners whose family have looked after it for over 40 years.

One particular aspect of the kiwi bach way of life represented by many of the Taylor's Mistake baches (including Bach 41) is a connection with surf lifesaving – a recreation which has played a pivotal role in fostering beach and bach culture. The Taylor's Mistake Surf Lifesaving Club (TMSLC) was formed in 1916 in the first wave of surf club establishment that followed the Edwardian enthusiasm for sea bathing, and has been one of the strongest clubs in New Zealand ever since. The club's biggest annual event is the Kesteven Cup, held regularly since 1918. The baches at Taylor's have always played a big part in the success of their local surf club, providing a pool from which members are drawn and through which memberships are maintained. The fact that many baches have been owned by the same families through multiple generations has contributed to a distinct family culture at the TMSLC. While the baches have contributed to the well-being of the TMSLC, the relationship has been two-way, and the club has also provided an on-going community focus for bach owners over the last century.

The public esteem for the wider Taylor's Mistake area has been regularly and consistently demonstrated by its representation in the visual media through the years as an archetypal bach community. In the middle decades of the 20th century, the bay was an accessible subject for the 'Canterbury School' of regionalist painters. The most well-known of these paintings is Bill Sutton's *Untitled (Taylor's Mistake)* of the late 1940s. The bay has also been depicted by Francis Shurrock, Rosa Sawtell, Doris Lusk, and Cecil and Elizabeth Kelly. Since the 1980s, nostalgia for and celebration of the traditional bach way of life has seen Taylor's Mistake baches frequently depicted in picture books and other popular media. This exposure has contributed to Taylor's Mistake becoming one of New Zealand's better-known and most iconic beach settlements.

ARCHITECTURAL AND AESTHETIC SIGNIFICANCE

Architectural and aesthetic values that demonstrate or are associated with: a particular style, period or designer, design values, form, scale, colour, texture and material of the place.

Bach 41 has architectural and aesthetic significance as a representative example of what is now considered a distinctive sub-group of New Zealand architecture, the small vernacular

dwellings commonly built (and often subsequently altered) to serve as baches in the early and middle years of the 20th century.

Such dwellings were usually owner built and designed without formal plans (or planning), constructed of locally-sourced, affordable or found materials, and often later altered and adapted to suit owners' needs as required. Bach design was usually individual and particular to the site, with design and style reflecting the notions, needs and means of their owners.

Many of the first generation of baches were formed from shore-line caves. The remote location of many Taylor's Mistake baches - where most materials had to be carried or boated in - encouraged the use of lightweight materials and whatever was immediately to hand. By mid-century, baches were usually more substantial structures, built of commercial materials such as fibre cement cladding (Fibrolite/Polite), possibly as a result of changing building code requirements. Although they were more akin to permanent dwellings, these baches resembled their predecessors in so far as they were usually designed by their owners and generally did not follow typical domestic models. Built for an informal lifestyle, they tended to adhere more to a mid-century art deco or modernist-derived aesthetic, with features such as mono-pitch roofs, open-plan layouts and indoor-outdoor flow.

Bach 41 reflects the typology and characteristics of the 'kiwi' bach in its simple forms and materials. The first Bach 41 – built by Edward Lewis around WWI – was a small skillion-roofed weatherboard hut. This was extended on several occasions over the next fifty years, into a structure with a pitched roof and a small monopitch section to the front, creating an L-shaped structure. It was reclad in Fibrolite. As a consequence, Bach 41 is an archetypal mid-century bach. There have been no substantive alterations since the 1970s.

TECHNOLOGICAL AND CRAFTSMANSHIP SIGNIFICANCE

Technological and craftsmanship values that demonstrate or are associated with: the nature and use of materials, finishes and/or technological or constructional methods which were innovative, or of notable quality for the period.

Bach 41 has technological significance as a vernacular building built and subsequently altered by its owners as needs dictated and means allowed, and reflecting the building techniques and materials of the early and mid-20th century. The changes over time followed the trend of building more permanent baches. The use of bought (rather than found) materials may have been a response to building regulations, as noted above, and the availability of materials such as fibrolite, which could be easily flat packed and carted, enabled construction at less cost than more traditional materials. Fibrolite fell out of favour in the 1970s and 80s² and is not found in later alterations to the baches, meaning this bach is very much a product of its time.

CONTEXTUAL SIGNIFICANCE

Contextual values that demonstrate or are associated with: a relationship to the environment (constructed and natural), a landscape, setting, group, precinct or streetscape; a degree of consistency in terms of type, scale, form, materials, texture, colour, style and/or detail; recognised landmarks and landscape which are recognised and contribute to the unique identity of the environment.

Bach 41 has contextual significance on its site and within its setting. The contextual significance of the bach is derived partly from its location in the coastal landscape, and partly from its association with the other small scale and informally-built baches of Taylor's Mistake. The bach is located towards the southern end of the linear group of baches known as Rotten Row. The ground rises immediately behind the bach.

Rotten Row is a linear group of baches located on the sandy foreshore behind the Taylor's Mistake beach close to the foot of the steep hills behind and oriented towards the beach and the bay. The baches in this group are single storied, with small footprints. They are characterised by simple roof and window forms, flat/smooth wall cladding (flat sheets of fibrolite) and usually no decorative elements. The baches are additive in nature with gabled roof or skillion roof forms, commonly with lean-tos and flat or skillion roofed additions. This

² <https://teara.govt.nz/en/ephemera/38658/fibrolite>

group are commonly clad in Fibrolite, weatherboard or corrugated iron, with iron roofs. Paint colours range from neutral beige and brown to green and vibrant blues. Windows usually make up a large proportion of the principal facades to maximise light and views, and are timber framed. Glazed French doors are also common. Raised up above the beach, the baches are usually accessed via steps. Many of the baches feature small uncovered decks and concrete porches. There are generally open grassed areas and low informal gardens to the front, which include shrubs, succulents and cabbage trees.

Bach 41 relates strongly to this group in terms of its design, scale, form, materials, texture and location and is a key contributor to the group. The group of baches of Taylor's Mistake are a well-known landmark in Christchurch as they are a prominent feature of the bay and its popular coastal walk.

ARCHAEOLOGICAL AND SCIENTIFIC SIGNIFICANCE

Archaeological or scientific values that demonstrate or are associated with: the potential to provide information through physical or scientific evidence and understanding about social historical, cultural, spiritual, technological or other values of past events, activities, structures or people.

Bach 41 and its setting are of archaeological significance because they have the potential to provide archaeological evidence relating to past building construction methods and materials, and human activity on the site. There was no known Māori settlement at Taylor's Mistake (Te Onepoto/short beach), but it likely to have been employed in mahinga kai (food gathering). Baches were developed in the area from the late 19th century.

ASSESSMENT STATEMENT

Bach 41 and its setting are of overall heritage significance to Christchurch, including Banks Peninsula. The bach has historical and social significance as a reflection of aspects of patterns of recreation and leisure in mid-20th century New Zealand; for its association with WWI veteran Edward Lewis and long-standing bay families, the Steads and the Turpins; and as part of the Taylor's Mistake bach community – well-known in Christchurch. It has cultural significance for the manner in which it signifies the informal do-it-yourself bach way of life of the early and mid-20th century, for the longevity of individual family ownership associated with it, for its connection with surf lifesaving and for the area's frequent artistic representation. The building has architectural and aesthetic significance as a representative example of the small vernacular dwellings commonly built to serve as baches in the middle years of the 20th century, more permanent than their predecessors but still individual and particular to their sites, and altered over time. The bach has technological significance as a vernacular building, reflecting the building techniques and materials of the mid-20th century. It has contextual significance on its site and within its setting, for its relationship to the landscape and bay, and for its shared physical characteristics with the landmark group of baches known as Rotten Row, of which it is a key contributor. The building and its setting are of archaeological significance because they have the potential to provide archaeological evidence relating to past building construction methods and materials, and human activity on the site.

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Paul Thompson *The Bach* (1985)

Kevyn Male's *Good Old Kiwi Baches* (2001)

REPORT DATED: 14 OCTOBER 2021

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PLEASE USE IN CONJUNCTION WITH THE C CHRISTCHURCH CITY COUNCIL HERITAGE FILES.

**CHRISTCHURCH DISTRICT PLAN – SCHEDULED HERITAGE PLACE
HERITAGE ASSESSMENT – STATEMENT OF SIGNIFICANCE
HERITAGE ITEM NUMBER 1415
*BACH AND SETTING - 42 TAYLOR'S MISTAKE BAY,
SCARBOROUGH***



PHOTOGRAPH: G. WRIGHT, 2017

HISTORICAL AND SOCIAL SIGNIFICANCE

Historical and social values that demonstrate or are associated with: a particular person, group, organisation, institution, event, phase or activity; the continuity and/or change of a phase or activity; social, historical, traditional, economic, political or other patterns.

Bach 42 in Rotten Row has historical and social significance as a reflection of aspects of patterns of recreation and leisure in mid-20th century New Zealand; for its association with the long-standing bay family, the Eastwicks; and as part of the Taylor's Mistake bach community – well-known in Christchurch.

The largest single concentration of baches at Taylor's Mistake is so-called Rotten Row, a string of 19 baches arrayed along the shore on the eastern side of the bay. The first bach in the Row was constructed in 1913 by blacksmith William Stevens. Research to date suggests that this was an early iteration of Bach 32. By 1920 there were a dozen baches in this location. Bach 42 is located towards the southern end of the Row.

The first part of what would become Bach 42 was a small hut built around the time of World War I by Lyttelton port worker Henry Eastwick and his friends. The group had previously spent their weekends camping in a disused cow shed on the site at the edge of the sand dunes. In 1932 the bach was held in the name of R. W. Evans but by the end of the decade Henry and wife Rosina had assumed ownership, and the Eastwicks were holidaying there regularly.

During World War II when many baches – including 42 - were requisitioned by the army several baches sustained damage during a live firing exercise. Bach 42 had three windows broken.

Henry and Rosina had a large family with five children and many grandchildren. Many of the family have been members of the Taylor's Mistake Surf Life Saving Club (TMSLC) through the years – grandson Ken and brother Noel were in the first intake of 'midgets' (or juniors) in 1949. To ease the overcrowding at 42, Ken and Noel's father Henry and his brother Hector bought Bach 36 in c.1961. Bach 42 was consequently left to daughter Ivy (known as Connie) and her husband Ronald Peek on Henry's death in 1963. After Connie Peek's death in 1996, the bach was sold to John McKeown, a stalwart of the New Brighton Surf Life Saving Club. After the Canterbury earthquake sequence of 2010-2011, John sold it in turn to Kenneth Jones, a long-standing TMSLC member and recent president. Ken's sister and brother-in-law Rayleen and Darryl Neate also own Bach 55, demonstrating the interconnected family ownership that is prevalent in the Taylor's Mistake community.

CULTURAL AND SPIRITUAL SIGNIFICANCE

Cultural and spiritual values that demonstrate or are associated with the distinctive characteristics of a way of life, philosophy, tradition, religion, or other belief, including: the symbolic or commemorative value of the place; significance to Tangata Whenua; and/or associations with an identifiable group and esteemed by this group for its cultural values.

Bach 42 has cultural significance for the manner in which it signifies the informal do-it-yourself bach way of life of the early and mid-20th century, for the length of time it was owned by one family, for its demonstration of the interconnectedness of family ownership within this bach community and for the area's frequent artistic representation. The bach way of life is held to represent values which are quintessentially 'kiwi' representing the New Zealand culture of 'do it yourself' and connecting with the natural environment. Bach 42 is valued by its owners whose family have a lengthy relationship with the area.

One particular aspect of the kiwi bach way of life represented by many of the Taylor's Mistake baches (including Bach 42) is a connection with surf lifesaving – a recreation which has played a pivotal role in fostering beach and bach culture. The TMSLC was formed in 1916 in the first wave of surf club establishment that followed the Edwardian enthusiasm for sea bathing, and has been one of the strongest clubs in New Zealand ever since. The club's biggest annual event is the Kesteven Cup, held regularly since 1918. The baches at Taylor's have always played a big part in the success of their local surf club, providing a pool from which members are drawn and through which memberships are maintained. The fact that many baches have been owned by the same families through multiple generations has contributed to a distinct family culture at the TMSLC. While the baches have contributed to the well-being of the TMSLC, the relationship has been two-way, and the club has also provided an on-going community focus for bach owners over the last century.

The public esteem for the wider Taylor's Mistake area has been regularly and consistently demonstrated by its representation in the visual media through the years as an archetypal bach community. In the middle decades of the 20th century, the bay was an accessible subject for the 'Canterbury School' of regionalist painters. The most well-known of these paintings is Bill Sutton's *Untitled (Taylor's Mistake)* of the late 1940s. The bay has also been depicted by Francis Shurrock, Rosa Sawtell, Doris Lusk, and Cecil and Elizabeth Kelly. Since the 1980s, nostalgia for and celebration of the traditional bach way of life has seen Taylor's Mistake baches frequently depicted in picture books and other popular media. This exposure has contributed to Taylor's Mistake becoming one of New Zealand's better-known and most iconic beach settlements.

ARCHITECTURAL AND AESTHETIC SIGNIFICANCE

Architectural and aesthetic values that demonstrate or are associated with: a particular style, period or designer, design values, form, scale, colour, texture and material of the place.

Bach 42 has architectural and aesthetic significance as a representative example of what is now considered a distinctive sub-group of New Zealand architecture, the small vernacular dwellings commonly built (and often subsequently altered) to serve as baches in the early and middle years of the 20th century.

Such dwellings were usually owner built and designed without formal plans (or planning), constructed of locally-sourced, affordable or found materials, and often later altered and adapted to suit owners' needs as required. Bach design was usually individual and particular to the site, with design and style reflecting the notions, needs and means of their owners. Many of the first generation of baches were formed from shore-line caves. The remote location of many Taylor's Mistake baches - where most materials had to be carried or boated in - encouraged the use of lightweight materials and whatever was immediately to hand. By mid-century, baches were usually more substantial structures, built of commercial materials such as fibre cement cladding (Fibrolite/Polite), possibly as a result of changing building code requirements. Although they were more akin to permanent dwellings, these baches resembled their predecessors in so far as they were usually designed by their owners and generally did not follow typical domestic models. Built for an informal lifestyle, they tended to adhere more to a mid-century art deco or modernist-derived aesthetic, with features such as mono-pitch roofs, open-plan layouts and indoor-outdoor flow.

Bach 42 reflects the typology and characteristics of the 'kiwi' bach in its simple forms and materials. The first Bach 42 – built by Henry Eastwick and companions around WWI – was a small weatherboard hut. This was enlarged and altered substantially during the 1930s, and then again in 1964 after the Peeks took ownership, when a large gabled addition was made to the front elevation. Windows are large and timber framed, and there are glazed doors. A small concrete porch is located within the L shape of the two wings. Unlike many other baches in the row that were altered around this time, the building has continued to be clad in weatherboards, rather than one of the commercially available alternatives of that time. There have been no substantive alterations since the 1960s.

TECHNOLOGICAL AND CRAFTSMANSHIP SIGNIFICANCE

Technological and craftsmanship values that demonstrate or are associated with: the nature and use of materials, finishes and/or technological or constructional methods which were innovative, or of notable quality for the period.

Bach 42 has technological significance as a vernacular building built and subsequently altered by the members of the Eastwick family as needs dictated and means allowed, and reflecting traditional building techniques and materials of the early and mid-20th century. The changes over time followed the trend of building more permanent baches. The use of weatherboards materials may have been a response to building regulations, and their retention rather than subsequent replacement in light weight Fibrolite (as was common for many baches) may be a reflection of their quality and condition, as well as the owner's material preferences.

CONTEXTUAL SIGNIFICANCE

Contextual values that demonstrate or are associated with: a relationship to the environment (constructed and natural), a landscape, setting, group, precinct or streetscape; a degree of consistency in terms of type, scale, form, materials, texture, colour, style and/or detail; recognised landmarks and landscape which are recognised and contribute to the unique identity of the environment.

Bach 42 has contextual significance on its site and within its setting. The contextual significance of the bach is derived partly from its location in the coastal landscape, and partly from its association with the other small scale and informally-built baches of Taylor's Mistake. The bach is located towards the southern end of the linear group of baches known as Rotten Row. The ground rises immediately behind the bach to a row of large macrocarpas.

Rotten Row is a linear group of baches located on the sandy foreshore behind the Taylor's Mistake beach close to the foot of the steep hills behind and oriented towards the beach and the bay. The baches in this group are single storied, with small footprints. They are

characterised by simple roof and window forms, flat/smooth wall cladding (flat sheets of fibrolite) and usually no decorative elements. The baches are additive in nature with gabled roof or skillion roof forms, commonly with lean-tos and flat or skillion roofed additions. This group are commonly clad in Fibrolite, weatherboard or corrugated iron, with iron roofs. Paint colours range from neutral beige and brown to green and vibrant blues. Windows usually make up a large proportion of the principal facades to maximise light and views, and are timber framed. Glazed French doors are also common. Raised up above the beach, the baches are usually accessed via steps. Many of the baches feature small uncovered decks and concrete porches. There are generally open grassed areas and low informal gardens to the front, which include shrubs, succulents and cabbage trees.

Bach 42 relates strongly to this group in terms of its design, scale, form, materials and location and is a key contributor to the group. The group of baches of Taylor's Mistake are a well-known landmark in Christchurch as they are a prominent feature of the bay and its popular coastal walk.

ARCHAEOLOGICAL AND SCIENTIFIC SIGNIFICANCE

Archaeological or scientific values that demonstrate or are associated with: the potential to provide information through physical or scientific evidence and understanding about social historical, cultural, spiritual, technological or other values of past events, activities, structures or people.

Bach 42 and its setting are of archaeological significance because they have the potential to provide archaeological evidence relating to past building construction methods and materials, and human activity on the site. There was no known Māori settlement at Taylor's Mistake (Te Onepoto/short beach), but it is likely to have been employed in mahinga kai (food gathering). Baches were developed in the area from the late 19th century.

ASSESSMENT STATEMENT

Bach 42 and its setting are of overall heritage significance to Christchurch, including Banks Peninsula. The bach has historical and social significance as a reflection of aspects of patterns of recreation and leisure in mid-20th century New Zealand; for its association with long-standing bay family, the Eastwicks; and as part of the well-known Taylor's Mistake bach community. It has cultural significance for the manner in which it signifies the informal do-it-yourself bach way of life of the early and mid-20th century, for the length of time it was owned by one family, for its demonstration of the interconnectedness of family ownership within this bach community, its connection with surf lifesaving and for the area's frequent artistic representation. The building has architectural and aesthetic significance as a representative example of the small vernacular dwellings commonly built to serve as baches in the middle years of the 20th century, more permanent than their predecessors but still individual and particular to their sites, and altered over time. The bach has technological significance as a vernacular building, reflecting traditional building techniques and materials of the mid-20th century. It has contextual significance on its site and within its setting, for its relationship to the landscape and bay, and for its shared physical characteristics with the landmark group of baches known as Rotten Row, of which it is a key contributor. The bach and its setting are of archaeological significance because they have the potential to provide archaeological evidence relating to past building construction methods and materials, and human activity on the site.

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Kevyn Male's *Good Old Kiwi Baches* (2001)

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**CHRISTCHURCH DISTRICT PLAN – SCHEDULED HERITAGE PLACE
HERITAGE ASSESSMENT – STATEMENT OF SIGNIFICANCE
HERITAGE ITEM NUMBER 1414
*BACH AND SETTING - 43 TAYLOR'S MISTAKE BAY,
SCARBOROUGH***



PHOTOGRAPH: G. WRIGHT, 2017

HISTORICAL AND SOCIAL SIGNIFICANCE

Historical and social values that demonstrate or are associated with: a particular person, group, organisation, institution, event, phase or activity; the continuity and/or change of a phase or activity; social, historical, traditional, economic, political or other patterns.

Bach 43 in Rotten Row has historical and social significance as a reflection of aspects of patterns of recreation and leisure in early and mid-20th century New Zealand; for its century-long association with the McKinley family; and as part of the Taylor's Mistake bach community – well-known in Christchurch.

The largest single concentration of baches at Taylor's Mistake is so-called Rotten Row, a string of 19 baches arrayed along the shore on the eastern side of the bay. The first bach in the Row was constructed in 1913 by blacksmith William Stevens. Research to date suggests that this was an early iteration of Bach 32. By 1920 there were a dozen baches in this location. Bach 43 is located in the middle of the Row.

Bach 43 was built by James McKinley, a storeman and commercial traveller, in the early 1920s. After visiting Taylor's Mistake with friends McKinley joined the infant Taylor's Mistake Surf Life Saving Club (TMSLC), which he served as both a competitor and official for over 30 years. In order to be able to overnight at the bay, James built a small lean-to hut. This was initially located at the back of Rotten Row on privately-owned farmland, but when ownership

of the farm changed, he slid his bach forward onto the narrow strip of public land shared by the Row's other baches. Neighbouring bach 44 did the same. During World War II when many baches – including 43 – were requisitioned by the army several baches sustained damage during a live firing exercise. Bach 43 had a window broken. The McKinley bach was returned in mid-1943.

McKinley and his wife Ada had four children (Lois, Laurence, Wilda and Ronald) who grew up enjoying life at the family bach. In the 1950s the time came for the bach to be passed on to the next generation however, none of the children were in a position to accept it. James and Ada therefore sold it to Ada's nephew R. J. Colombus, with the proviso that it be offered back to the McKinley family if he no longer wanted it. When in 1975 that circumstance arose, Ronald took up the offer.

Ronald McKinley was – like his father and older brother – an active member of the TMSLC. On his death in 2001, the bach was taken over by his sons Owen and Phillip, although Phillip died in 2002.

CULTURAL AND SPIRITUAL SIGNIFICANCE

Cultural and spiritual values that demonstrate or are associated with the distinctive characteristics of a way of life, philosophy, tradition, religion, or other belief, including: the symbolic or commemorative value of the place; significance to Tangata Whenua; and/or associations with an identifiable group and esteemed by this group for its cultural values.

Bach 43 has cultural significance for the manner in which it signifies the informal self-sufficient bach way of life of the early and mid-20th century, for its retention for the entirety of its existence by one family, for its demonstration of the interconnectedness of family ownership within this bach community and for its frequent artistic representation. The bach way of life is held to represent values which are quintessentially 'kiwi' representing the New Zealand culture of 'do it yourself' and connecting with the natural environment. Bach 43 is valued by its present custodians, whose family have owned it for almost a century.

One particular aspect of the kiwi bach way of life represented by many of the Taylor's Mistake baches (including Bach 43) is a connection with surf lifesaving – a recreation which has played a pivotal role in fostering beach and bach culture. The Taylor's Mistake Surf Lifesaving Club (TMSLC) was formed in 1916 in the first wave of surf club establishment that followed the Edwardian enthusiasm for sea bathing, and has been one of the strongest clubs in New Zealand ever since. The club's biggest annual event is the Kesteven Cup, held regularly since 1918. The baches at Taylor's have always played a big part in the success of their local surf club, providing a pool from which members are drawn and through which memberships are maintained. The fact that many baches have been owned by the same families through multiple generations has contributed to a distinct family culture at the TMSLC. While the baches have contributed to the well-being of the TMSLC, the relationship has been two-way, and the club has also provided an on-going community focus for bach owners over the last century.

The public esteem for the wider Taylor's Mistake area has been regularly and consistently demonstrated by its representation in the visual media through the years as an archetypal bach community. In the middle decades of the 20th century, the bay was an accessible subject for the 'Canterbury School' of regionalist painters. The most well-known of these paintings is Bill Sutton's *Untitled (Taylor's Mistake)* of the late 1940s. The bay has also been depicted by Francis Shurrock, Rosa Sawtell, Doris Lusk, and Cecil and Elizabeth Kelly. Since the 1980s, nostalgia for and celebration of the traditional bach way of life has seen Taylor's Mistake baches frequently depicted in picture books and other popular media. This exposure has contributed to Taylor's Mistake becoming one of New Zealand's better-known and most iconic beach settlements.

ARCHITECTURAL AND AESTHETIC SIGNIFICANCE

Architectural and aesthetic values that demonstrate or are associated with: a particular style, period or designer, design values, form, scale, colour, texture and material of the place.

Bach 43 has architectural and aesthetic significance as a representative example of what is now considered a distinctive sub-group of New Zealand architecture, the small vernacular dwellings commonly built (and often subsequently altered) to serve as baches in the early and middle years of the 20th century.

Such dwellings were usually owner built and designed without formal plans (or planning), constructed of locally-sourced, affordable or found materials, and often later altered and adapted to suit owners' needs as required. Bach design was usually individual and particular to the site, with design and style reflecting the notions, needs and means of their owners. Many of the first generation of baches were formed from shore-line caves. The remote location of many Taylor's Mistake baches - where most materials had to be carried or boated in - encouraged the use of lightweight materials and whatever was immediately to hand. By mid-century, baches were usually more substantial structures, built of commercial materials such as fibre cement cladding (Fibrolite/Polite), possibly as a result of changing building code requirements. Although they were more akin to permanent dwellings, these baches resembled their predecessors in so far as they were usually designed by their owners and generally did not follow typical domestic models. Built for an informal lifestyle, they tended to adhere more to a mid-century art deco or modernist-derived aesthetic, with features such as mono-pitch roofs, open-plan layouts and indoor-outdoor flow.

Bach 43 reflects the typology and characteristics of the 'kiwi' bach in its simple forms and materials. Built in the early 1920s, it began (as did most Rotten Row baches) as a diminutive lean-to hut of one or two rooms. By 1930 this had been altered to or replaced by a more substantial gabled structure. Before 1940 this had been dragged forward on its site to remove it from private land, the porch infilled, and a partial lean-to added to the front elevation. The bach took on its present appearance during the ownership of Jack Colombus, between the late 1950s and the early 1970s. It is currently clad in corrugated iron. The bach is unusual at Taylors Mistake in that it has decorative geometric panels applied to the front wall. The beach frontage is substantially glazed, including French doors. The roof is clad in corrugated iron and the windows are timber framed. Concrete steps and a small landing lead up to the French doors.

TECHNOLOGICAL AND CRAFTSMANSHIP SIGNIFICANCE

Technological and craftsmanship values that demonstrate or are associated with: the nature and use of materials, finishes and/or technological or constructional methods which were innovative, or of notable quality for the period.

Bach 43 has technological and craftsmanship significance as a vernacular building, built and subsequently altered as required over time. It reflects the building techniques and materials of the early and mid-20th century. The enlargement over time followed the trend of building more permanent baches. The corrugated iron cladding is a retention of one of the earliest bach cladding materials used at Taylor's Mistake. Metal cladding can be seen on earlier buildings in other bach communities in New Zealand, such as Rangitoto or Upper Selwyn Huts.

CONTEXTUAL SIGNIFICANCE

Contextual values that demonstrate or are associated with: a relationship to the environment (constructed and natural), a landscape, setting, group, precinct or streetscape; a degree of consistency in terms of type, scale, form, materials, texture, colour, style and/or detail; recognised landmarks and landscape which are recognised and contribute to the unique identity of the environment.

Bach 43 has contextual significance on its site and within its setting. The contextual significance of the bach is derived partly from its location in the coastal landscape, and partly from its association with the other small scale and informally-built baches of Taylor's Mistake. The bach is located in the middle of the linear row of baches known as Rotten Row.

Rotten Row is a linear group of baches located on the sandy foreshore behind the Taylor's Mistake beach close to the foot of the steep hills behind and oriented towards the beach and the bay. The baches in this group are single storied, with small footprints. They are characterised by simple roof and window forms, flat/smooth wall cladding (flat sheets of

fibrolite) and usually no decorative elements. The baches are additive in nature with gabled roof or skillion roof forms, commonly with lean-tos and flat or skillion roofed additions. This group are commonly clad in Fibrolite, weatherboard or corrugated iron, with iron roofs. Paint colours range from neutral beige and brown to green and vibrant blues. Windows usually make up a large proportion of the principal facades to maximise light and views, and are timber framed. Glazed French doors are also common. Raised up above the beach, the baches are usually accessed via steps. Many of the baches feature small uncovered decks and concrete porches. There are generally open grassed areas and low informal gardens to the front, which include shrubs, succulents and cabbage trees.

Bach 43 relates strongly to this group in terms of its design, scale, form, materials, texture and location and is a key contributor to the group. In particular it relates strongly to its neighbour Bach 44 in terms of the corrugated iron cladding. The group of baches of Taylor's Mistake are a well-known landmark in Christchurch as they are a prominent feature of the bay and its popular coastal walk.

ARCHAEOLOGICAL AND SCIENTIFIC SIGNIFICANCE

Archaeological or scientific values that demonstrate or are associated with: the potential to provide information through physical or scientific evidence and understanding about social historical, cultural, spiritual, technological or other values of past events, activities, structures or people.

Bach 43 and its setting are of archaeological significance because they have the potential to provide archaeological evidence relating to past building construction methods and materials, and human activity on the site. There was no known Māori settlement at Taylor's Mistake (Te Onepoto/short beach), but it is likely to have been employed in mahinga kai (food gathering). Baches were developed in the area from the late 19th century.

ASSESSMENT STATEMENT

Bach 43 and its setting are of overall heritage significance to Christchurch, including Banks Peninsula. The bach has historical and social significance as a reflection of aspects of patterns of recreation and leisure in mid-20th century New Zealand; for its century-long connection with the McKinley family; connections with the TMSLC and as part of the Taylor's Mistake bach community – well-known in Christchurch. The bach has cultural significance for the manner in which it signifies the informal self-sufficient bach way of life of the early and mid-20th century, for its retention for the entirety of its existence by one family, for its demonstration of the interconnectedness of family ownership within this bach community, its connection with the surf lifesaving and for the area's frequent artistic representation. The building has architectural and aesthetic significance as a representative example of the small vernacular dwellings commonly built to serve as baches in the early and middle years of the 20th century, individual and particular to their sites, and altered over time. The bach has technological significance as a vernacular building, built and subsequently altered over time, reflecting the building techniques and materials of the early and mid-20th century. It has contextual significance on its site and within its setting, for its relationship to the landscape and bay, and for its shared physical characteristics with the landmark group of baches known as Rotten Row, of which it is a key contributor. The bach and its setting are of archaeological significance because they have the potential to provide archaeological evidence relating to past building construction methods and materials, and human activity on the site.

REFERENCES:

J. Abbott; *The Baches of Taylor's Mistake: Rotten Row Boulder Bay Press*, 2018.

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Taylor's Mistake Association files (privately held)

Pers. comm. Janet Abbott

Births, Deaths and Marriages website

Papers Past website

Wises Street Directories (accessed via Ancestry website)

Paul Thompson *The Bach* (1985)

Kevyn Male's *Good Old Kiwi Baches* (2001)

REPORT DATED: 14 OCTOBER 2021

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PLEASE USE IN CONJUNCTION WITH THE CHRISTCHURCH CITY COUNCIL HERITAGE FILES.

**CHRISTCHURCH DISTRICT PLAN – SCHEDULED HERITAGE PLACE
HERITAGE ASSESSMENT – STATEMENT OF SIGNIFICANCE
HERITAGE ITEM NUMBER 1413
*BACH AND SETTING - 44 TAYLOR'S MISTAKE BAY,
SCARBOROUGH***



PHOTOGRAPH: G. WRIGHT, 2017

HISTORICAL AND SOCIAL SIGNIFICANCE

Historical and social values that demonstrate or are associated with: a particular person, group, organisation, institution, event, phase or activity; the continuity and/or change of a phase or activity; social, historical, traditional, economic, political or other patterns.

Bach 44 in Rotten Row has historical and social significance as a reflection of aspects of patterns of recreation and leisure in early and mid-20th century New Zealand; for its long associations with prominent Taylor's Mistake families including the Roberts, Le Crens and Hills; and as part of the Taylor's Mistake bach community – well-known in Christchurch.

The largest single concentration of baches at Taylor's Mistake is so-called Rotten Row, a string of 19 baches arrayed along the shore on the eastern side of the bay. The first bach in the Row was constructed in 1913 by blacksmith William Stevens. Research to date suggests that this was an early iteration of Bach 32. By 1920 there were a dozen baches in this location. Bach 44 is located towards the west end of the Row.

Research suggests that Bach 44 is likely to have been built by Frank Houselander in the mid-1920s. Frank was a tram motorman (driver) in the early 20th century, and later when he built his bach, he was working as a storeman for the Buick Sales Company in Woolston. He married Leonora Erskine in 1902 and the couple had one daughter, Nancy. Unusually the bach was listed under Nancy Houselander's name in 1932 – one of a very small number of female bach 'owners' at this time. Nancy herself was living in Wellington by early 1934.

Baches 43 and 44 were originally located at the back of Rotten Row on privately-owned farmland, but after ownership of the farm changed in the 1930s, the two bach owners slid their huts forward onto the narrow strip of public land shared by the Row's other baches.

By the early years of World War II, Bach 44 had been transferred to Julia Roberts. During the war Bach 44 was one of many Taylor's Mistake baches requisitioned by the army for billeting soldiers.

In around 1950 Bach 44 was sold to Keith Le Cren and his wife Irene. After the war Keith worked as a maintenance engineer at Marathon Rubber Footwear – part of the Skellerup Rubber Group – at Woolston. Irene (known as Rene) had lifesaving and Taylor's Mistake connections. She was the daughter of Lewis Agassiz who is associated with Bach 36. Rene herself was a competitive swimmer with various Christchurch clubs and was a member of the Sumner Surf Life Saving Club for much of the 1920s and 30s.

After the Le Crens purchased Bach 44 they became actively involved with the Taylor's Mistake Surf Life Saving Club (TMSLC). Keith served as president between 1955 and 1960, and Rene supervised the young female club members who were regularly accommodated in Bach 44 and its neighbours. Geoff Le Cren, their son, was a prominent competitor, coach and administrator for many decades, and was created a life member in 2001.

After his mothers' death in 1965, Geoff lived in Bach 44 for a couple of years before selling it to Peter Hill and his wife Joanne in 1968. Peter was a member of the New Brighton SLC. Peter and Jo's sons David and Bruce became members of the TMSLC in the late 1970s, and David has served as Club Captain (1990-1992) and President (2005-2007). David, an architect, has been a persistent advocate for the retention of the baches. His sub thesis for his degree, *Living on the Queen's Chain*, was an early study of the history and typology of the traditional New Zealand coastal bach. He and his partner are the current owners of Bach 44.

CULTURAL AND SPIRITUAL SIGNIFICANCE

Cultural and spiritual values that demonstrate or are associated with the distinctive characteristics of a way of life, philosophy, tradition, religion, or other belief, including: the symbolic or commemorative value of the place; significance to Tangata Whenua; and/or associations with an identifiable group and esteemed by this group for its cultural values.

Bach 44 has cultural significance for the manner in which it signifies the informal self-sufficient bach way of life of the early and mid-20th century, for its demonstration of the interconnectedness of family ownership within this bach community and for the area's frequent artistic representation. The bach way of life is held to represent values which are quintessentially 'kiwi' representing the New Zealand culture of 'do it yourself' and connecting with the natural environment. Bach 44 is valued by its current owners, whose family have owned it for 50 years.

One particular aspect of the kiwi bach way of life represented by many of the Taylor's Mistake baches (including Bach 44) is a connection with surf lifesaving – a recreation which has played a pivotal role in fostering beach and bach culture. The Taylor's Mistake Surf Lifesaving Club (TMSLC) was formed in 1916 in the first wave of surf club establishment that followed the Edwardian enthusiasm for sea bathing, and has been one of the strongest clubs in New Zealand ever since. The club's biggest annual event is the Kesteven Cup, held regularly since 1918. The baches at Taylor's have always played a big part in the success of their local surf club, providing a pool from which members are drawn and through which memberships are maintained. The fact that many baches have been owned by the same families through multiple generations has contributed to a distinct family culture at the TMSLC. While the baches have contributed to the well-being of the TMSLC, the relationship has been two-way, and the club has also provided an on-going community focus for bach owners over the last century.

The public esteem for the wider Taylor's Mistake area has been regularly and consistently demonstrated by its representation in the visual media through the years as an archetypal bach community. In the middle decades of the 20th century, the bay was an accessible

subject for the 'Canterbury School' of regionalist painters. The most well-known of these paintings is Bill Sutton's *Untitled (Taylor's Mistake)* of the late 1940s. The bay has also been depicted by Francis Shurrock, Rosa Sawtell, Doris Lusk, and Cecil and Elizabeth Kelly. Since the 1980s, nostalgia for and celebration of the traditional bach way of life has seen Taylor's Mistake baches frequently depicted in picture books and other popular media. This exposure has contributed to Taylor's Mistake becoming one of New Zealand's better-known and most iconic beach settlements.

ARCHITECTURAL AND AESTHETIC SIGNIFICANCE

Architectural and aesthetic values that demonstrate or are associated with: a particular style, period or designer, design values, form, scale, colour, texture and material of the place.

Bach 44 has architectural and aesthetic significance as a representative example of what is now considered a distinctive sub-group of New Zealand architecture, the small vernacular dwellings commonly built (and often subsequently altered) to serve as baches in the early and middle years of the 20th century. These were always individual and particular to their sites, with design and style reflecting the notions and needs of their owners.

Such dwellings were usually owner built and designed without formal plans (or planning), constructed of locally-sourced, affordable or found materials, and often later altered and adapted to suit owners' needs as required. Bach design was usually individual and particular to the site, with design and style reflecting the notions, needs and means of their owners. Many of the first generation of baches were formed from shore-line caves. The remote location of many Taylor's Mistake baches - where most materials had to be carried or boated in - encouraged the use of lightweight materials and whatever was immediately to hand. By mid-century, baches were usually more substantial structures, built of commercial materials such as fibre cement cladding (Fibrolite/Polite), possibly as a result of changing building code requirements. Although they were more akin to permanent dwellings, these baches resembled their predecessors in so far as they were usually designed by their owners and generally did not follow typical domestic models. Built for an informal lifestyle, they tended to adhere more to a mid-century art deco or modernist-derived aesthetic, with features such as mono-pitch roofs, open-plan layouts and indoor-outdoor flow.

Bach 44 reflects the typology and characteristics of the 'kiwi' bach in its simple forms and materials. When constructed in the mid-1920s, Bach 44 was a small gabled hut of probably one room. Around the time it was relocated forward on its site in c1940, the building was extended to the east. Photos of the bach in its early decades show shutters on its small windows. Soon after Keith Le Cren purchased the bach in 1950, he extended the front elevation out by around three metres. The large sliding timber casement window was also put in at this time. A few years later the rear elevation was extended to accommodate a shower and to bring the outhouse indoors. The next owners, the Hill family did not alter its external appearance further. The building is presently clad in corrugated iron.

TECHNOLOGICAL AND CRAFTSMANSHIP SIGNIFICANCE

Technological and craftsmanship values that demonstrate or are associated with: the nature and use of materials, finishes and/or technological or constructional methods which were innovative, or of notable quality for the period.

Bach 44 has technological and craftsmanship significance as a vernacular building that was built and subsequently altered as required over time. It reflects the building techniques and materials of the early and mid-20th century. The enlargement over time followed the trend of building more permanent baches. The corrugated iron cladding is a retention of one of the earliest bach cladding materials used at Taylor's Mistake. Metal cladding can be seen on earlier buildings in other bach communities in New Zealand, such as Rangitoto or Upper Selwyn Huts.

CONTEXTUAL SIGNIFICANCE

Contextual values that demonstrate or are associated with: a relationship to the environment (constructed and natural), a landscape, setting, group, precinct or streetscape; a degree of

consistency in terms of type, scale, form, materials, texture, colour, style and/or detail; recognised landmarks and landscape which are recognised and contribute to the unique identity of the environment.

Bach 44 has contextual significance on its site and within its setting. The contextual significance of the bach is derived partly from its location in the coastal landscape, and partly from its association with the other small scale and informally-built baches of Taylor's Mistake.

Rotten Row is a linear group of baches located on the sandy foreshore behind the Taylor's Mistake beach close to the foot of the steep hills behind and oriented towards the beach and the bay. The baches in this group are single storied, with small footprints. They are characterised by simple roof and window forms, flat/smooth wall cladding (flat sheets of fibrolite) and usually no decorative elements. The baches are additive in nature with gabled roof or skillion roof forms, commonly with lean-tos and flat or skillion roofed additions. This group are commonly clad in Fibrolite, weatherboard or corrugated iron, with iron roofs. Paint colours range from neutral beige and brown to green and vibrant blues. Windows usually make up a large proportion of the principal facades to maximise light and views, and are timber framed. Glazed French doors are also common. Raised up above the beach, the baches are usually accessed via steps. Many of the baches feature small uncovered decks and concrete porches. There are generally open grassed areas and low informal gardens to the front, which include shrubs, succulents and cabbage trees.

Bach 44 relates strongly to this group in terms of its design, scale, form, materials, texture and location and is a key contributor to the group. In particular it relates strongly to its neighbour Bach 43 in terms of the corrugated iron cladding. The bach is located towards the west end of the linear group of baches known as Rotten Row. The group of baches of Taylor's Mistake are a well-known landmark in Christchurch walkers as they are a prominent feature of the bay and its popular coastal walk.

ARCHAEOLOGICAL AND SCIENTIFIC SIGNIFICANCE

Archaeological or scientific values that demonstrate or are associated with: the potential to provide information through physical or scientific evidence and understanding about social historical, cultural, spiritual, technological or other values of past events, activities, structures or people.

Bach 44 and its setting are of archaeological significance because they have the potential to provide archaeological evidence relating to past building construction methods and materials, and human activity on the site. There was no known Māori settlement at Taylor's Mistake (Te Onepoto/short beach), but it is likely to have been employed in mahinga kai (food gathering). Baches were developed in the area from the turn of the 20th century.

ASSESSMENT STATEMENT

Bach 44 and its setting are of overall heritage significance to Christchurch, including Banks Peninsula. The bach has historical and social significance as a reflection of aspects of patterns of recreation and leisure in mid-20th century New Zealand; for its long associations with prominent Bay families the Roberts, Le Crens and Hills; and as part of the Taylor's Mistake bach community – well-known in Christchurch. It has cultural significance for the manner in which it signifies the informal do-it-yourself bach way of life of the early and mid-20th century, for its demonstration of the interconnectedness of family ownership within this bach community, its connection with surf lifesaving and for its frequent artistic representation. The building has architectural and aesthetic significance as a representative example of the small vernacular dwellings commonly built to serve as baches in the early and middle years of the 20th century, individual and particular to their sites, and altered over time. The bach has technological significance as a vernacular building, reflecting the building techniques and materials of the early and mid-20th century. It has contextual significance on its site and within its setting, for its relationship to the landscape and bay, and for its shared physical characteristics with the landmark group of baches known as Rotten Row, of which it is a key contributor. The bach and its setting are of archaeological significance because they have

the potential to provide archaeological evidence relating to past building construction methods and materials, and human activity on the site.

REFERENCES:

J. Abbott; *The Baches of Taylor's Mistake: Rotten Row* Boulder Bay Press, 2018.

R. Cairns; B. Turpin *Guardians of the Mistake: the history of the Taylor's Mistake Surf Life Saving Club 1916-1991*

P. Carpinter; K. Tutty *Taylor's Mistake - Over the Hill for 100 Years: a history of Taylor's Mistake Surf Life Saving Club 1916-2016*

B. Mortlock, *Life History Report. An appendix to The Taylors Mistake Bach Holders Community Assessment*, 1998

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Wises Street Directories (accessed via Ancestry website)

Paul Thompson *The Bach* (1985)

Kevyn Male's *Good Old Kiwi Baches* (2001)

REPORT DATED: 14 OCTOBER 2021

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PLEASE USE IN CONJUNCTION WITH THE CHRISTCHURCH CITY COUNCIL HERITAGE FILES.

**CHRISTCHURCH DISTRICT PLAN – SCHEDULED HERITAGE PLACE
HERITAGE ASSESSMENT – STATEMENT OF SIGNIFICANCE
HERITAGE ITEM NUMBER 1412
*BACH AND SETTING - 45 TAYLOR’S MISTAKE BAY,
SCARBOROUGH***



PHOTOGRAPH: G. WRIGHT, 2017

HISTORICAL AND SOCIAL SIGNIFICANCE

Historical and social values that demonstrate or are associated with: a particular person, group, organisation, institution, event, phase or activity; the continuity and/or change of a phase or activity; social, historical, traditional, economic, political or other patterns.

Bach 45 in Rotten Row has historical and social significance as a reflection of aspects of patterns of recreation and leisure in mid-20th century New Zealand; for its associations with Taylor’s Mistake identities the Hodge brothers and long-standing bay family the Gilpins; and as part of the Taylor’s Mistake bach community – well-known in Christchurch.

The largest single concentration of baches at Taylor’s Mistake is so-called Rotten Row, a string of 19 baches arrayed along the shore on the eastern side of the bay. The first bach in the Row was constructed in 1913 by blacksmith William Stevens. Research to date suggests that this was an early iteration of Bach 32. By 1920 there were a dozen baches in this location. Bach 45 is located towards the western end of the Row.

Bach 45 was constructed by brothers James and George Hodge for James in the mid-1930s. James Hodge emigrated to Christchurch from London with his wife Lavinia and six children in 1920. They lived in Sydenham, and James was council employee. Research to date suggests that James was granted the vacant plot (45) formerly owned by C. Peters, in 1934, around the same time as his brother was granted adjacent plot 46. Rather than construct new baches from scratch on their sites, the Hodges purchased a redundant railway carriage (A60)

from New Zealand Railways at auction for £20. This was not an unusual undertaking in the mid-20th century, as the conversion of redundant tram cars and railway carriages became quite frequent. Concentrations of these conversions can still be found in places like the Coromandel Peninsula. After A60 was bought by the Hodge brothers, running gear was removed and the carriage split in two. The two segments were then transported on two flatbed trucks to the carpark at Taylor's Mistake and then carried across the beach. The task is said to have taken them six months. Once the two segments were in position, each brother adapted them to suit their particular requirements.

Around 1940 both Hodge carriage baches were put on the market. Bach 45 was sold to Malcolm Gilpin and his wife Elsie in January 1941. During World War II when many baches – including 45 - were requisitioned by the army several baches sustained damage during a live firing exercise. Bach 45 had two windows broken.

Later Bach 45 passed to Malcolm and Elsie's son Malcolm Gilpin and his wife Rosaleen. During the 1960s, the carriage was known to Taylor's Mistake residents as 'the party bach'. The bach is currently owned by the fourth generation of the Gilpin family.

CULTURAL AND SPIRITUAL SIGNIFICANCE

Cultural and spiritual values that demonstrate or are associated with the distinctive characteristics of a way of life, philosophy, tradition, religion, or other belief, including: the symbolic or commemorative value of the place; significance to Tangata Whenua; and/or associations with an identifiable group and esteemed by this group for its cultural values.

Bach 45 has cultural significance for the manner in which it signifies the informal self-sufficient bach way of life of the early and mid-20th century, for its longevity of ownership within one family, for its demonstration of the interconnectedness of family ownership within this bach community and for its frequent artistic representation. The bach way of life is held to represent values which are quintessentially 'kiwi' representing the New Zealand culture of 'do it yourself' and connecting with the natural environment. Bach 45 is valued by its owners whose family have looked after it for over 70 years.

The public esteem for the wider Taylor's Mistake area has been regularly and consistently demonstrated by its representation in the visual media through the years as an archetypal bach community. In the middle decades of the 20th century, the bay was an accessible subject for the 'Canterbury School' of regionalist painters. The most well-known of these paintings is Bill Sutton's *Untitled (Taylor's Mistake)* of the late 1940s. The bay has also been depicted by Francis Shurrock, Rosa Sawtell, Doris Lusk, and Cecil and Elizabeth Kelly. Since the 1980s, nostalgia for and celebration of the traditional bach way of life has seen Taylor's Mistake baches frequently depicted in picture books and other popular media. This exposure has contributed to Taylor's Mistake becoming one of New Zealand's better-known and most iconic beach settlements.

ARCHITECTURAL AND AESTHETIC SIGNIFICANCE

Architectural and aesthetic values that demonstrate or are associated with: a particular style, period or designer, design values, form, scale, colour, texture and material of the place.

Bach 45 has architectural and aesthetic significance as an unusual local example of a converted railway carriage and as an example of what is now considered a distinctive sub-group of New Zealand architecture, the small vernacular dwellings that were typically built to serve as baches in the early decades of the 20th century.

Baches were usually owner built and designed without formal plans (or planning), constructed of locally-sourced, affordable or found materials, and often later altered and adapted to suit owners' needs as required. Bach design was usually individual and particular to the site, with design and style reflecting the notions, needs and means of their owners. Many of the first generation of baches were formed from shore-line caves. The remote location of many Taylor's Mistake baches - where most materials had to be carried or boated in - encouraged the use of lightweight materials and whatever was immediately to hand. By mid-century, baches were usually more substantial structures, built of commercial materials such as fibre

cement cladding (Fibrolite/Polite), possibly as a result of changing building code requirements.

The conversion of redundant railway carriages and tram cars to baches was a common phenomenon in mid-20th century New Zealand, and numbers still remain in coastal and river mouth hut communities like Taylor's Mistake. A particular concentration of tram car baches (some 80-90) remain around the Coromandel Peninsula; the 23 at Waikawau are recognized in the Thames Coromandel District Plan as an Historic Area.

Bach 45 reflects the typology and characteristics of the 'kiwi' bach, in that it was formed from half an Edwardian railway carriage in the mid-1930s by its owner builder. After relocating it to its new site, James Hodge added a gabled roof, a porch and additional rooms, but the carriage origin of the bach is still clearly visible in the linear form of the building and surviving elements of detail such as doors, benches, windows and the pressed tin ceiling. The building has been little-altered since its initial adaptation more than 80 years ago.

Between 1904 and 1908 the Wellington and Manuwatu Railway Company manufactured 12 carriages at their depot in Thorndon, following the design of a batch of their carriages built by Jackson and Sharp of Philadelphia in 1902. These carriages were built using timber – mainly Kauri - salvaged from the wooden trestle viaduct that previously bridged the Belmont Valley near Johnsonville. It would appear that the carriage used by the Hodge brothers is one of these locally-built WMR carriages; the number suggests it dates from 1907 or 1908, and would therefore be one of the last to roll off the production line. Control of the WMR passed to NZR in December 1908, and its carriages were dispersed across the country.¹

TECHNOLOGICAL AND CRAFTSMANSHIP SIGNIFICANCE

Technological and craftsmanship values that demonstrate or are associated with: the nature and use of materials, finishes and/or technological or constructional methods which were innovative, or of notable quality for the period.

Bach 45 has technological and craftsmanship significance as an early and little-altered example of the conversion of a carriage (or tram) to a dwelling. The carriage was domesticated with additional spaces and a neatly bracketed porch, but its origins are unmistakable in the many carefully-crafted carriage features that remain including doors, windows and bench seats. Many trams were similarly converted to baches following the closure of the nation's tramway systems in the 1950s and 1960s.

CONTEXTUAL SIGNIFICANCE

Contextual values that demonstrate or are associated with: a relationship to the environment (constructed and natural), a landscape, setting, group, precinct or streetscape; a degree of consistency in terms of type, scale, form, materials, texture, colour, style and/or detail; recognised landmarks and landscape which are recognised and contribute to the unique identity of the environment.

Bach 45 has contextual significance on its site and within its setting. The contextual significance of the bach is derived partly from its location in the coastal landscape, and partly from its association with the other small scale and informally-built baches of Taylor's Mistake.

Rotten Row is a linear group of baches located on the sandy foreshore behind the Taylor's Mistake beach close to the foot of the steep hills behind and oriented towards the beach and the bay. The baches in this group are single storied, with small footprints. They are characterised by simple roof and window forms, flat/smooth wall cladding (flat sheets of fibrolite) and usually no decorative elements. The baches are additive in nature with gabled roof or skillion roof forms, commonly with lean-tos and flat or skillion roofed additions. This group are commonly clad in Fibrolite, weatherboard or corrugated iron, with iron roofs. Paint colours range from neutral beige and brown to green and vibrant blues. Windows usually make up a large proportion of the principal facades to maximise light and views, and are timber framed. Glazed French doors are also common. Raised up above the beach, the

¹ Merrifield

baches are usually accessed via steps. Many of the baches feature small uncovered decks and concrete porches. There are generally open grassed areas and low informal gardens to the front, which include shrubs, succulents and cabbage trees.

Bach 45 relates strongly to this group in terms of its design, scale, form, materials, texture and location and is a key contributor to the group. In particular it relates to neighbouring Bach 46, also a converted carriage bach in terms of its form, details and materials. The bach is located towards the western end of the group of baches known as Rotten Row. Rotten Row is a linear group which faces the beach and the bay with the hills behind. The group of baches of Taylor's Mistake are a well-known landmark in Christchurch as they are a prominent feature of the bay and its popular coastal walk.

ARCHAEOLOGICAL AND SCIENTIFIC SIGNIFICANCE

Archaeological or scientific values that demonstrate or are associated with: the potential to provide information through physical or scientific evidence and understanding about social historical, cultural, spiritual, technological or other values of past events, activities, structures or people.

Bach 45 and its setting are of archaeological significance because they have the potential to provide archaeological evidence relating to past building construction methods and materials, and human activity on the site. There was no known Māori settlement at Taylor's Mistake (Te Onepoto/short beach), but it is likely to have been employed in mahinga kai (food gathering). Baches were developed in the area from the turn of the 20th century.

ASSESSMENT STATEMENT

Bach 45 and its setting are of overall heritage significance to Christchurch, including Banks Peninsula. The bach has historical and social significance as a reflection of aspects of patterns of recreation and leisure in mid-20th century New Zealand; for its associations with Taylor's Mistake identities the Hodge brothers and long-standing bay family, the Gilpins; and as part of the Taylor's Mistake bach community – well-known in Christchurch. It has cultural significance for the manner in which it signifies the informal do-it-yourself bach way of life of the early and mid-20th century, for its longevity of ownership within one family, for its demonstration of the interconnectedness of family ownership within this bach community and for the area's frequent artistic representation. The building has architectural and aesthetic significance as a representative example of the small vernacular dwellings built from converted railway carriages to serve as baches in the middle years of the 20th century. The bach has technological and craftsmanship significance for the materials and detailing of the carriage that remain intact. It has contextual significance on its site and within its setting, for its relationship to the landscape and bay, and for its shared physical characteristics with the landmark group of baches known as Rotten Row, of which it is a key contributor. The bach and its setting are of archaeological significance because they have the potential to provide archaeological evidence relating to past building construction methods and materials, and human activity on the site.

REFERENCES:

J. Abbott; *The Baches of Taylor's Mistake: Rotten Row* Boulder Bay Press, 2018.

R. Cairns; B. Turpin *Guardians of the Mistake: the history of the Taylor's Mistake Surf Life Saving Club 1916-1991*

P. Carpinter; K. Tutty *Taylor's Mistake - Over the Hill for 100 Years: a history of Taylor's Mistake Surf Life Saving Club 1916-2016*

A. Merrifield *An Exercise in Large Scale Joinery: restoration of three historic Wellington and Manuwatu railway carriages* 4th Australasian Engineering Heritage Conference, Lincoln University, 24-26 November 2014.

B. Mortlock, *Life History Report. An appendix to The Taylors Mistake Bach Holders Community Assessment*, 1998

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Taylor's Mistake Association files (privately held)

Pers. comm. Janet Abbott

Births, Deaths and Marriages website

Papers Past website

Wises Street Directories (accessed via Ancestry website)

Paul Thompson *The Bach* (1985)

Kevyn Male's *Good Old Kiwi Baches* (2001)

REPORT DATED: 14 OCTOBER 2021

PLEASE NOTE THIS ASSESSMENT IS BASED ON INFORMATION AVAILABLE AT THE TIME OF WRITING. DUE TO THE ONGOING NATURE OF HERITAGE RESEARCH, FUTURE REASSESSMENT OF THIS HERITAGE ITEM MAY BE NECESSARY TO REFLECT ANY CHANGES IN KNOWLEDGE AND UNDERSTANDING OF ITS HERITAGE SIGNIFICANCE.

PLEASE USE IN CONJUNCTION WITH THE CHRISTCHURCH CITY COUNCIL HERITAGE FILES.

**CHRISTCHURCH DISTRICT PLAN – SCHEDULED HERITAGE PLACE
HERITAGE ASSESSMENT – STATEMENT OF SIGNIFICANCE
HERITAGE ITEM NUMBER 1411
*BACH AND SETTING - 46 TAYLOR'S MISTAKE BAY,
SCARBOROUGH***



PHOTOGRAPH: G. WRIGHT, 2017

HISTORICAL AND SOCIAL SIGNIFICANCE

Historical and social values that demonstrate or are associated with: a particular person, group, organisation, institution, event, phase or activity; the continuity and/or change of a phase or activity; social, historical, traditional, economic, political or other patterns.

Bach 46 in Rotten Row has historical and social significance as a reflection of aspects of patterns of recreation and leisure in mid-20th century New Zealand; for its associations with Taylor's Mistake identities the Hodge brothers and long-standing bay family, the Pratleys; and as part of the Taylor's Mistake bach community – well-known in Christchurch.

The largest single concentration of baches at Taylor's Mistake is so-called Rotten Row, a string of 19 baches arrayed along the shore on the eastern side of the bay. The first bach in the Row was constructed in 1913 by blacksmith William Stevens. Research to date suggests that this was an early iteration of Bach 32. By 1920 there were a dozen baches in this location. Bach 46 is located towards the western end of the Row.

Bach 46 was constructed by brothers James and George Hodge in the mid-1930s for George. George Hodge followed his younger brother to Christchurch from London in the 1920s. He became an engineer with the Christchurch Tramways Board, serving as Permanent Way Superintendent (responsible for track work) from 1928 until his retirement. Sanitary inspector Francis Rogerson originally owned the vacant plot 46, which George was granted for a hut in 1934 by the Sumner Borough Council. Research to date suggests that brother James purchased the adjacent plot (45) at the same time.

Rather than construct new baches from scratch, George and James purchased a redundant railway carriage (A60) from New Zealand Railways at auction for £20. This was not an unusual undertaking in the mid-20th century, as the conversion of redundant tram cars and railway carriages became quite frequent. Concentrations of these conversions can still be found in places like the Coromandel Peninsula. After A60 was bought by the Hodge brothers, running gear was removed and the carriage split in two. The two segments were then transported on two flatbed trucks to the carpark at Taylor's Mistake and carried across the beach. The task is said to have taken them six months. Once the two segments were in position on their respective plots, each brother adapted them to suit their particular requirements.

Around 1940 both Hodge carriage baches were put on the market. George remained at the bay and built a new Bach 32 for himself in c1945. Bach 46 was transferred to Lionel Gordon Pratley and his wife Rose in February 1941. The Pratley family only had use of their new bach for a year, and then World War II intervened. During the war when many baches – including 46 – were requisitioned by the army several baches sustained damage during a live firing exercise. Bach 46 had six windows broken.

Following the war Lionel and Rose's older son Graham Gordon joined the Taylor's Mistake Life Saving Club – one of only two juniors competing at that time. Gordon became a club stalwart – competing, coaching, and serving as Club Captain (1949-1956) and President (1967-1972). He was made a life member in 1972.¹ Bach 46 remains in the Pratley family.

CULTURAL AND SPIRITUAL SIGNIFICANCE

Cultural and spiritual values that demonstrate or are associated with the distinctive characteristics of a way of life, philosophy, tradition, religion, or other belief, including: the symbolic or commemorative value of the place; significance to Tangata Whenua; and/or associations with an identifiable group and esteemed by this group for its cultural values.

Bach 46 has cultural significance for the manner in which it signifies the informal self-sufficient bach way of life of the early and mid-20th century, for its longevity of ownership within one family and for its frequent artistic representation. The bach way of life is held to represent values which are quintessentially 'kiwi' representing the New Zealand culture of 'do it yourself' and connecting with the natural environment. Bach 46 is valued by its owners whose family have looked after it for over 70 years.

One particular aspect of the kiwi bach way of life represented by many of the Taylor's Mistake baches (including Bach 46) is a connection with surf lifesaving – a recreation which has played a pivotal role in fostering beach and bach culture. The Taylor's Mistake Surf Lifesaving Club (TMSLC) was formed in 1916 in the first wave of surf club establishment that followed the Edwardian enthusiasm for sea bathing, and has been one of the strongest clubs in New Zealand ever since. The club's biggest annual event is the Kesteven Cup, held regularly since 1918. The baches at Taylor's have always played a big part in the success of their local surf club, providing a pool from which members are drawn and through which memberships are maintained. The fact that many baches have been owned by the same families through multiple generations has contributed to a distinct family culture at the TMSLC. While the baches have contributed to the well-being of the TMSLC, the relationship has been two-way, and the club has also provided an on-going community focus for bach owners over the last century.

The public esteem for the wider Taylor's Mistake area has been regularly and consistently demonstrated by its representation in the visual media through the years as an archetypal bach community. In the middle decades of the 20th century, the bay was an accessible subject for the 'Canterbury School' of regionalist painters. The most well-known of these paintings is Bill Sutton's *Untitled (Taylor's Mistake)* of the late 1940s. The bay has also been depicted by Francis Shurrock, Rosa Sawtell, Doris Lusk, and Cecil and Elizabeth Kelly. Since the 1980s, nostalgia for and celebration of the traditional bach way of life has seen Taylor's Mistake baches frequently depicted in picture books and other popular media. This exposure

¹ Carpinter & Tutty pp 105, 122

has contributed to Taylor's Mistake becoming one of New Zealand's better-known and most iconic beach settlements.

ARCHITECTURAL AND AESTHETIC SIGNIFICANCE

Architectural and aesthetic values that demonstrate or are associated with: a particular style, period or designer, design values, form, scale, colour, texture and material of the place.

Bach 46 has architectural and aesthetic significance as an unusual local example of a converted railway carriage, and as an example of what is now considered a distinctive sub-group of New Zealand architecture, the small vernacular dwellings that were typically served as baches in the early decades of the 20th century.

Baches were usually owner built and designed without formal plans (or planning), constructed of locally-sourced, affordable or found materials, and often later altered and adapted to suit owners' needs as required. Bach design was usually individual and particular to the site, with design and style reflecting the notions, needs and means of their owners. Many of the first generation of baches were formed from shore-line caves. The remote location of many Taylor's Mistake baches - where most materials had to be carried or boated in - encouraged the use of lightweight materials and whatever was immediately to hand. By mid-century, baches were usually more substantial structures, built of commercial materials such as fibre cement cladding (Fibrolite/Polite), possibly as a result of changing building code requirements. Although they were more akin to permanent dwellings, these baches resembled their predecessors in so far as they were usually designed by their owners and generally did not follow typical domestic models. Built for an informal lifestyle, they tended to adhere more to a mid-century art deco or modernist-derived aesthetic, with features such as mono-pitch roofs, open-plan layouts and indoor-outdoor flow.

The conversion of redundant railway carriages and tram cars to baches was a common phenomenon in mid-20th century New Zealand, and numbers still remain in coastal and river mouth hut communities like Taylor's Mistake. A particular concentration of tram car baches (some 80-90) remain around the Coromandel Peninsula; the 23 at Waikawau are recognized in the Thames Coromandel District Plan as an Historic Area.

Bach 46 reflects the typology and characteristic of the 'kiwi' bach, in that it was formed from half an Edwardian railway carriage in the mid-1930s by brothers James and George Hodge for George. After relocating it to its new site, the Hodges added a gabled roof and additional spaces, and clad most elevations in weatherboard. Initially Bach 46 closely resembled James' adjacent 45, with an open bracketed porch. Later – probably in the 1960s – this was enclosed. Although no elements of the carriage remain visible on the exterior, the height and linear form of the building convey its origins. Inside many original details remain, including windows, panelling and the pressed tin ceiling.

Between 1904 and 1908 the Wellington and Manuwatu Railway Company (MWR) manufactured 12 carriages at their depot in Thorndon, following the design of a batch of their carriages built by Jackson and Sharp of Philadelphia in 1902. These carriages were built using timber – mainly Kauri - salvaged from the wooden trestle viaduct that previously bridged the Belmont Valley near Johnsonville. It would appear that the carriage used by the Hodge brothers is one of these locally-built WMR carriages; the number suggests it dates from 1907 or 1908, and would therefore be one of the last to roll off the production line. Control of the WMR passed to NZR in December 1908, and its carriages were dispersed across the country.²

TECHNOLOGICAL AND CRAFTSMANSHIP SIGNIFICANCE

Technological and craftsmanship values that demonstrate or are associated with: the nature and use of materials, finishes and/or technological or constructional methods which were innovative, or of notable quality for the period.

² Merrifield

Bach 46 has technological and craftsmanship significance as a vernacular building and an early example of the conversion of a carriage (or tram) to a dwelling, reflecting the building techniques and materials of the early and mid-20th century. The carriage was domesticated with additional spaces, a gabled roof and weatherboard cladding, but its origins are visible in the carriage features that remain including windows, panelling and the pressed tin ceiling. Many trams were similarly converted to baches following the closure of the nation's tramway systems in the 1950s and 1960s.

CONTEXTUAL SIGNIFICANCE

Contextual values that demonstrate or are associated with: a relationship to the environment (constructed and natural), a landscape, setting, group, precinct or streetscape; a degree of consistency in terms of type, scale, form, materials, texture, colour, style and/or detail; recognised landmarks and landscape which are recognised and contribute to the unique identity of the environment.

Bach 46 has contextual significance on its site and within its setting. The contextual significance of the bach is derived partly from its location in the coastal landscape, and partly from its association with the other small scale and informally-built baches of Taylor's Mistake. The bach is located towards the western end of the linear group of baches known as Rotten Row.

Rotten Row is a linear group of baches located on the sandy foreshore behind the Taylor's Mistake beach close to the foot of the steep hills behind and oriented towards the beach and the bay. The baches in this group are single storied, with small footprints. They are characterised by simple roof and window forms, flat/smooth wall cladding (flat sheets of fibrolite) and usually no decorative elements. The baches are additive in nature with gabled roof or skillion roof forms, commonly with lean-tos and flat or skillion roofed additions. This group are commonly clad in Fibrolite, weatherboard or corrugated iron, with iron roofs. Paint colours range from neutral beige and brown to green and vibrant blues. Windows usually make up a large proportion of the principal facades to maximise light and views, and are timber framed. Glazed French doors are also common. Raised up above the beach, the baches are usually accessed via steps. Many of the baches feature small uncovered decks and concrete porches. There are generally open grassed areas and low informal gardens to the front, which include shrubs, succulents and cabbage trees.

Bach 46 relates strongly to this group in terms of its design, scale, form, materials, texture and location and is a key contributor to the group. In particular it relates to neighbouring Bach 45, also a converted carriage bach in terms of its form, materials, details and scale. The group of baches of Taylor's Mistake are a well-known landmark in Christchurch as they are a prominent feature of the bay and its popular coastal walk.

ARCHAEOLOGICAL AND SCIENTIFIC SIGNIFICANCE

Archaeological or scientific values that demonstrate or are associated with: the potential to provide information through physical or scientific evidence and understanding about social historical, cultural, spiritual, technological or other values of past events, activities, structures or people.

Bach 46 and its setting are of archaeological significance because they have the potential to provide archaeological evidence relating to past building construction methods and materials, and human activity on the site. There was no known Māori settlement at Taylor's Mistake (Te Onepoto/short beach), but the area was likely to have been employed in mahinga kai (food gathering). Baches were developed in the area from the turn of the 20th century.

ASSESSMENT STATEMENT

Bach 46 and its setting are of overall heritage significance to Christchurch, including Banks Peninsula. The bach has historical and social significance as a reflection of aspects of patterns of recreation and leisure in mid-20th century New Zealand; for its associations with Taylor's Mistake identities the Hodge brothers and long-standing bay family, the Pratleys; and as part of the well-known Taylor's Mistake bach community. It has cultural significance for the

manner in which it signifies the informal do-it-yourself bach way of life of the early and mid-20th century, for its longevity of ownership within one family, its connection with surf lifesaving and for the area's frequent artistic representation. The building has architectural and aesthetic significance as a converted railway carriage, and as a representative example of the small dwellings commonly built to serve as baches in the middle years of the 20th century, and adapted over time. The bach has technological and craftsmanship significance for the materials and detailing of the carriage that remain intact. It has contextual significance on its site and within its setting, for its relationship to the landscape and bay, and for its shared physical characteristics with the landmark group of baches known as Rotten Row, of which it is a key contributor. The bach and its setting are of archaeological significance because they have the potential to provide archaeological evidence relating to past building construction methods and materials, and human activity on the site.

REFERENCES:

J. Abbott; *The Baches of Taylor's Mistake: Rotten Row* Boulder Bay Press, 2018.

R. Cairns; B. Turpin *Guardians of the Mistake: the history of the Taylor's Mistake Surf Life Saving Club 1916-1991*

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B. Mortlock, *Life History Report. An appendix to The Taylors Mistake Bach Holders Community Assessment*, 1998

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Wises Street Directories (accessed via Ancestry website)

Paul Thompson *The Bach* (1985)

Kevyn Male's *Good Old Kiwi Baches* (2001)

REPORT DATED: 14 OCTOBER 2021

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PLEASE USE IN CONJUNCTION WITH THE CHRISTCHURCH CITY COUNCIL HERITAGE FILES.

**CHRISTCHURCH DISTRICT PLAN – SCHEDULED HERITAGE PLACE
HERITAGE ASSESSMENT – STATEMENT OF SIGNIFICANCE
HERITAGE ITEM NUMBER 1446
*BACH AND SETTING - 48 TAYLOR'S MISTAKE BAY,
SCARBOROUGH***



PHOTOGRAPH: G. WRIGHT, 2017

HISTORICAL AND SOCIAL SIGNIFICANCE

Historical and social values that demonstrate or are associated with: a particular person, group, organisation, institution, event, phase or activity; the continuity and/or change of a phase or activity; social, historical, traditional, economic, political or other patterns.

Bach 48, West End, has historical and social significance as a reflection of patterns of recreation and leisure in early and mid-20th century New Zealand; for its long association with just two families (the Peters/Woodhouse and Rowe families) over the last century and as part of the Taylor's Mistake bach community – well-known in Christchurch.

West of the group of baches at Taylor's Mistake known as Rotten Row, between the Surf Club Pavilion and the rocky outcrop of Hobson's Point is an area known as West End. This contains a number of baches; some built on the sandy foreshore and others on the steep rock of the Point. Bach 48 is built on the sand and is the eastern-most of these baches.

The origins of Bach 48 are uncertain, but research to date suggests that it was built in the years around World War I. Evidence suggests that the builder was Charles Peters. Peters was an upholsterer and in 1919 he set up as a cabinet maker. In 1923 Peters' 'Oak Furniture Company' went bankrupt and he attempted to sell his bach to settle some of his debts, but it

was seized by a Mr Balkind, one of his creditors.¹ He recovered it and research suggests that Peters dwelt there more or less permanently during the 1930s.

During World War II Bach 48 was one of many Taylor's Mistake baches requisitioned by the army for billeting soldiers. It was returned to Peters in September 1942. Peters died in 1943 and after his death, Bach 48 passed to his sister Rosina Woodhouse. In 1944, a year after Rosina and her husband John received Bach 48, they also purchased Bach 28. The family apparently used Bach 48 as their own holiday home, and 28 was let. Both baches were sold following John's death in 1964. Bach 48 was purchased by Trevor Rowe and his wife Ivy.

Ivy Rowe was a daughter of John Hobson who built the first bach (68) with his family in Hobson's Bay in c1907. The extended Hobson family occupied nearly all the dozen baches in Hobson's Bay. Ivy represented New Zealand in baseball in the 1940s, and encouraged her daughters to pursue sporting activities such as swimming. Her daughter Sandra joined the Taylor's Mistake Surf Life Saving Club (TMSLC), and her father is remembered as a lifelong supporter of the Club and the Bay.² Ivy's husband was also president of the Bach Owners Association for a period. Bach 48 is now jointly owned by their three daughters; many of their children are also involved with the TMSLC.

CULTURAL AND SPIRITUAL SIGNIFICANCE

Cultural and spiritual values that demonstrate or are associated with the distinctive characteristics of a way of life, philosophy, tradition, religion, or other belief, including: the symbolic or commemorative value of the place; significance to Tangata Whenua; and/or associations with an identifiable group and esteemed by this group for its cultural values.

Bach 48 has cultural significance for the manner in which it signifies the informal do-it-yourself self-sufficient bach way of life of the early and mid-20th century, for its longevity of ownership within only two families, for its demonstration of the interconnectedness of family ownership within this bach community and for its frequent artistic representation. The bach way of life is held to represent values which are quintessentially 'kiwi' representing the New Zealand culture of 'do it yourself' and connecting with the natural environment. Bach 48 is valued by its current owners whose family have owned it for over 50 years.

One particular aspect of the kiwi bach way of life represented by many of the Taylor's Mistake baches (including Bach 48) is a connection with surf lifesaving – a recreation which has played a pivotal role in fostering beach and bach culture. The Taylor's Mistake Surf Lifesaving Club (TMSLC) was formed in 1916 in the first wave of surf club establishment that followed the Edwardian enthusiasm for sea bathing, and has been one of the strongest clubs in New Zealand ever since. The club's biggest annual event is the Kesteven Cup, held regularly since 1918. The baches at Taylor's have always played a big part in the success of their local surf club, providing a pool from which members are drawn and through which memberships are maintained. The fact that many baches have been owned by the same families through multiple generations has contributed to a distinct family culture at the TMSLC. While the baches have contributed to the well-being of the TMSLC, the relationship has been two-way, and the club has also provided an on-going community focus for bach owners over the last century.

The public esteem for the wider Taylor's Mistake area has been regularly and consistently demonstrated by its representation in the visual media through the years as an archetypal bach community. In the middle decades of the 20th century, the bay was an accessible subject for the 'Canterbury School' of regionalist painters. The most well-known of these paintings is Bill Sutton's *Untitled (Taylor's Mistake)* of the late 1940s. The bay has also been depicted by Francis Shurrock, Rosa Sawtell, Doris Lusk, and Cecil and Elizabeth Kelly. Since the 1980s, nostalgia for and celebration of the traditional bach way of life has seen Taylor's Mistake baches frequently depicted in picture books and other popular media. This exposure has contributed to Taylor's Mistake becoming one of New Zealand's better-known and most iconic beach settlements.

¹ Press 17 March 1923.

² Carpinter & Tutty p. 278

ARCHITECTURAL AND AESTHETIC SIGNIFICANCE

Architectural and aesthetic values that demonstrate or are associated with: a particular style, period or designer, design values, form, scale, colour, texture and material of the place.

Bach 48 has architectural and aesthetic significance as a representative example of what is now considered a distinctive sub-group of New Zealand architecture, the small vernacular dwellings commonly built (and often subsequently altered) to serve as baches in the early and middle years of the 20th century.

Such dwellings were usually owner built and designed without formal plans (or planning), constructed of locally-sourced, affordable or found materials, and often later altered and adapted to suit owners' needs as required. Bach design was usually individual and particular to the site, with design and style reflecting the notions, needs and means of their owners. Many of the first generation of baches were formed from shore-line caves. The remote location of many Taylor's Mistake baches - where most materials had to be carried or boated in - encouraged the use of lightweight materials and whatever was immediately to hand. By mid-century, baches were usually more substantial structures, built of commercial materials such as fibre cement cladding (Fibrolite/Polite), possibly as a result of changing building code requirements. Although they were more akin to permanent dwellings, these baches resembled their predecessors in so far as they were usually designed by their owners and generally did not follow typical domestic models. Built for an informal lifestyle, they tended to adhere more to a mid-century art deco or modernist-derived aesthetic, with features such as mono-pitch roofs, open-plan layouts and indoor-outdoor flow.

Bach 48 reflects the typology and characteristics of the 'kiwi' bach in its simple forms and materials. When constructed in the mid-1910s, it was a small gabled weatherboard hut of probably one room, sitting side-on to the sea, well out on the sands. In the mid-1920s it was either rebuilt or rotated on its site so that the gable faced the sea. The front door was relocated to the side elevation and a new window placed in the front elevation. The bach remained in this form until after its purchase by the Rowe family. A fibrolite lean-to extension (a bunkroom) was added to the rear in 1967, giving the building an 'L' shaped footprint. A larger window was also inserted in the front elevation. The bach sustained some damage in the Canterbury Earthquake sequence of 2010-2011, and the chimney was removed.

TECHNOLOGICAL AND CRAFTSMANSHIP SIGNIFICANCE

Technological and craftsmanship values that demonstrate or are associated with: the nature and use of materials, finishes and/or technological or constructional methods which were innovative, or of notable quality for the period.

Bach 48 has technological and craftsmanship significance as a vernacular building, reflecting the building techniques and materials of the early and mid-20th century. The enlargement over time followed the trend of building more permanent baches. This bach began as a small weatherboard bach, with a bunkroom extension constructed of fibrolite in the late 1960s. The use of bought (rather than found) materials may have been a response to building regulations, as noted above, and the availability of materials such as fibrolite, which could be easily flat packed and carted, enabled construction at less cost than more traditional materials. Fibrolite fell out of favour in the 1970s and 80s³ and is not found in later alterations to baches meaning the alterations are specific to their time.

CONTEXTUAL SIGNIFICANCE

Contextual values that demonstrate or are associated with: a relationship to the environment (constructed and natural), a landscape, setting, group, precinct or streetscape; a degree of consistency in terms of type, scale, form, materials, texture, colour, style and/or detail; recognised landmarks and landscape which are recognised and contribute to the unique identity of the environment.

³ <https://teara.govt.nz/en/ephemera/38658/fibrolite>

Bach 48 has contextual significance on its site and within its setting. The contextual significance of the bach is derived partly from its location in the coastal landscape, and partly from its association with the other small scale and informally-built baches of Taylor's Mistake.

The bach is located on the sandy foreshore behind the Taylor's Mistake beach, in the area known as West End. The baches at the West end are tucked in to the cliff, with bush and scrub behind – either located directly on the beach, or up on the cliff. They are commonly timber weatherboard or fibrolite construction, with corrugated iron roofs and timber framed windows and doors. Most of the baches are single storied, with one a mix of single and two storied sections. Roof forms are gabled or mono pitched, or a mix of the two where there are later additions. Colours are predominantly light or dark tones. The baches located up on the cliff feature retaining walls and access stairs. Forms are generally rectangular and horizontal, extending across in line with the cliff.

Bach 48 relates strongly to this group in terms of its design, form, scale, materials, texture and location and is a key contributor to the group. The group of baches of Taylor's Mistake are well-known Christchurch landmark as they are a prominent feature of the bay and the popular coastal walk there.

ARCHAEOLOGICAL AND SCIENTIFIC SIGNIFICANCE

Archaeological or scientific values that demonstrate or are associated with: the potential to provide information through physical or scientific evidence and understanding about social historical, cultural, spiritual, technological or other values of past events, activities, structures or people.

Bach 48 and its setting are of archaeological significance because they have the potential to provide archaeological evidence relating to past building construction methods and materials, and human activity on the site. There was no known Māori settlement at Taylor's Mistake (Te Onepoto/short beach), but it was likely to have been employed in mahinga kai (food gathering). Baches were developed in the area from the turn of the 20th century.

ASSESSMENT STATEMENT

Bach 48 and its setting are of overall heritage significance to Christchurch, including Banks Peninsula.

The bach has historical and social significance as a reflection of patterns of recreation and leisure in mid-20th century New Zealand; for its long association with only two families; and as part of the Taylor's Mistake bach community – well-known in Christchurch. It has cultural significance for the manner in which it signifies the informal do-it-yourself bach way of life of the early and mid-20th century, for its longevity of ownership within only two families, for its demonstration of the interconnectedness of family ownership within this bach community and for its frequent artistic representation. The building has architectural and aesthetic significance as it typifies bach design of the early decades of the 20th century, and the common adaptation and alteration of baches over time. The bach has technological significance as a vernacular building, reflecting the building techniques and materials of the early and mid-20th century. It has contextual significance on its site and within its setting, for its relationship to the landscape and bay, and for its shared physical characteristics with the group of baches known as West End. The bach and its setting are of archaeological significance because they have the potential to provide archaeological evidence relating to past building construction methods and materials, and human activity on the site.

REFERENCES:

R. Cairns; B. Turpin *Guardians of the Mistake: the history of the Taylor's Mistake Surf Life Saving Club 1916-1991*

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Taylor's Mistake Association files (privately held)

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Pers. comm. Janet Abbott

Births, Deaths and Marriages website

Papers Past website

Te Ara Encyclopaedia of New Zealand <https://teara.govt.nz>

Wises Street Directories (accessed via Ancestry website)

Paul Thompson *The Bach* (1985)

Kevyn Male's *Good Old Kiwi Baches* (2001)

REPORT DATED: 7 OCTOBER 2021

PLEASE NOTE THIS ASSESSMENT IS BASED ON INFORMATION AVAILABLE AT THE TIME OF WRITING. DUE TO THE ONGOING NATURE OF HERITAGE RESEARCH, FUTURE REASSESSMENT OF THIS HERITAGE ITEM MAY BE NECESSARY TO REFLECT ANY CHANGES IN KNOWLEDGE AND UNDERSTANDING OF ITS HERITAGE SIGNIFICANCE.

PLEASE USE IN CONJUNCTION WITH THE CHRISTCHURCH CITY COUNCIL HERITAGE FILES.

**CHRISTCHURCH DISTRICT PLAN – SCHEDULED HERITAGE PLACE
HERITAGE ASSESSMENT – STATEMENT OF SIGNIFICANCE
HERITAGE ITEM NUMBER 1447
*BACH AND SETTING - 51 TAYLOR'S MISTAKE BAY,
SCARBOROUGH***



PHOTOGRAPH: G. WRIGHT, 2017

HISTORICAL AND SOCIAL SIGNIFICANCE

Historical and social values that demonstrate or are associated with: a particular person, group, organisation, institution, event, phase or activity; the continuity and/or change of a phase or activity; social, historical, traditional, economic, political or other patterns.

Bach 51, West End, has historical and social significance as a reflection of patterns of recreation and leisure in early and mid-20th century New Zealand; for its associations with prominent Taylor's Mistake Surf Life Saving Club (TMSLC) personality Norman Batchelor and the MacDonald family, and as part of the Taylor's Mistake bach community – well-known in Christchurch.

West of the group of baches at Taylor's Mistake known as Rotten Row, between the Surf Club Pavilion and the rocky outcrop of Hobson's Point is an area known as West End. This contains a number of baches; some built on the sandy foreshore and others on the steep rock of the Point. Bach 51 is the western-most of those built on the beach.

The origins of Bach 51 are uncertain, but in accordance with the history of most Taylor's Mistake baches, it is likely to have been built in the years around World War 1. Research to date suggests that the builder was Albert Andrews. Andrews was born in London, emigrated to New Zealand in c1912 and settled in Lyttelton where he worked for the Railways and as a watersider. A number of watersiders established baches in the bay during the first wave of hut construction around World War I. In addition to Andrews, these included Henry Eastwick (Bach 42) and Tom Malloy (Bach 34). Andrews died in 1935.

After Andrews' death, his bach passed to Norman Batchelor. Batchelor was a leading figure in the TMSLC in the inter-war years as a competitor, instructor and administrator (including a term as Club Captain 1927-1929). Batchelor won national titles in backstroke and freestyle between 1921 and 1924. Bach 51 was one of the baches requisitioned by the army during WWII. The key was returned to the Batchelors in December 1942. In 1950 Batchelor and his family moved to Auckland.

When the Batchelors left Christchurch, their bach passed to Charles Jackson and his wife Elizabeth. When the Jacksons died within a few months of each other in 1961, their bach passed to John C. MacDonald. The bach remained in the MacDonald family until 2015 when it was sold to builder Dave Louw. Louw also owns Bach 62 in Hobson's Bay.

CULTURAL AND SPIRITUAL SIGNIFICANCE

Cultural and spiritual values that demonstrate or are associated with the distinctive characteristics of a way of life, philosophy, tradition, religion, or other belief, including: the symbolic or commemorative value of the place; significance to Tangata Whenua; and/or associations with an identifiable group and esteemed by this group for its cultural values.

Bach 51 has cultural significance for the manner in which it signifies the informal do-it-yourself bach way of life of the early and mid-20th century, for its longevity of ownership within one family until recently, and for its frequent artistic representation. The bach way of life is held to represent values which are quintessentially 'kiwi' representing the New Zealand culture of 'do it yourself' and connecting with the natural environment.

One particular aspect of the kiwi bach way of life represented by many of the Taylor's Mistake baches (including Bach 51) is a connection with surf lifesaving – a recreation which has played a pivotal role in fostering beach and bach culture. The TMSLC was formed in 1916 in the first wave of surf club establishment that followed the Edwardian enthusiasm for sea bathing, and has been one of the strongest clubs in New Zealand ever since. The club's biggest annual event is the Kesteven Cup, held regularly since 1918. The baches at Taylor's have always played a big part in the success of their local surf club, providing a pool from which members are drawn and through which memberships are maintained. The fact that many baches have been owned by the same families through multiple generations has contributed to a distinct family culture at the TMSLC. While the baches have contributed to the well-being of the TMSLC, the relationship has been two-way, and the club has also provided an on-going community focus for bach owners over the last century.

The public esteem for the wider Taylor's Mistake area has been regularly and consistently demonstrated by its representation in the visual media through the years as an archetypal bach community. In the middle decades of the 20th century, the bay was an accessible subject for the 'Canterbury School' of regionalist painters. The most well-known of these paintings is Bill Sutton's *Untitled (Taylor's Mistake)* of the late 1940s. The bay has also been depicted by Francis Shurrock, Rosa Sawtell, Doris Lusk, and Cecil and Elizabeth Kelly. Since the 1980s, nostalgia for and celebration of the traditional bach way of life has seen Taylor's Mistake baches frequently depicted in picture books and other popular media. This exposure has contributed to Taylor's Mistake becoming one of New Zealand's better-known and most iconic beach settlements.

ARCHITECTURAL AND AESTHETIC SIGNIFICANCE

Architectural and aesthetic values that demonstrate or are associated with: a particular style, period or designer, design values, form, scale, colour, texture and material of the place.

Bach 51 has architectural and aesthetic significance as a representative example of what is now considered a distinctive sub-group of New Zealand architecture, the small vernacular dwellings commonly built to serve as baches in the early and middle years of the 20th century.

Baches were usually owner built and designed without formal plans (or planning), constructed of locally-sourced, affordable or found materials, and often later altered and adapted to suit

owners' needs as required. Bach design was usually individual and particular to the site, with design and style reflecting the notions, needs and means of their owners. Many of the first generation of baches were formed from shore-line caves. The remote location of many Taylor's Mistake baches - where most materials had to be carried or boated in - encouraged the use of lightweight materials and whatever was immediately to hand. By mid-century, baches were usually more substantial structures, built of commercial materials such as fibre cement cladding (Fibrolite/Polite), possibly as a result of changing building code requirements. Although they were more akin to permanent dwellings, these baches resembled their predecessors in so far as they were usually designed by their owners and generally did not follow typical domestic models. Built for an informal lifestyle, they tended to adhere more to a mid-century art deco or modernist-derived aesthetic, with features such as mono-pitch roofs, open-plan layouts and indoor-outdoor flow.

Bach 51 reflects the typology and characteristics of the 'kiwi' bach in its simple forms and materials. When constructed in the mid-1910s, Bach 51 was a small gabled weatherboard hut of probably one room, sitting side-on to the sea. In the middle years of the 20th century, the bach was extended by the addition of two lower-gabled sections at either end. Research to date suggests that the building was clad in fibrolite at this time, and French doors inserted in the north elevation. The roof is corrugated iron and windows and glazed doors are timber framed.

TECHNOLOGICAL AND CRAFTSMANSHIP SIGNIFICANCE

Technological and craftsmanship values that demonstrate or are associated with: the nature and use of materials, finishes and/or technological or constructional methods which were innovative, or of notable quality for the period.

Bach 51 has technological and craftsmanship significance as a vernacular building, reflecting the building techniques and materials of the early and mid-20th century. The enlargement in the mid-20th century and the cladding of the bach in fibrolite followed the trend of building more permanent baches. The use of bought (rather than found) materials may have been a response to building regulations, as noted above, and the availability of materials such as fibrolite, which could be easily flat packed and carted, enabled construction at less cost than more traditional materials. Fibrolite fell out of favour in the 1970s and 80s¹ and is not found in later alterations to baches meaning the bach is very much of its time.

CONTEXTUAL SIGNIFICANCE

Contextual values that demonstrate or are associated with: a relationship to the environment (constructed and natural), a landscape, setting, group, precinct or streetscape; a degree of consistency in terms of type, scale, form, materials, texture, colour, style and/or detail; recognised landmarks and landscape which are recognised and contribute to the unique identity of the environment.

Bach 51 has contextual significance on its site and within its setting. The contextual significance of the bach is derived partly from its location in the coastal landscape, and partly from its association with the other small scale and informally-built baches of Taylor's Mistake.

The bach is located on the sandy foreshore behind the Taylor's Mistake beach, in the area known as West End. The baches at the West end are tucked in to the cliff, with bush and scrub behind – either located directly on the beach, or up on the cliff. They are commonly timber weatherboard or fibrolite construction, with corrugated iron roofs and timber framed windows and doors. Most of the baches are single storied, with one a mix of single and two storied sections. Roof forms are gabled or mono pitched, or a mix of the two where there are later additions. Colours are predominantly light or dark tones. The baches located up on the cliff feature retaining walls and access stairs. Forms are generally rectangular and horizontal, extending across in line with the cliff.

Bach 51 relates to this group in terms of its design, scale, form, materials, texture and location and is a key contributor to the group. The group of baches of Taylor's Mistake are a well-

¹ <https://teara.govt.nz/en/ephemera/38658/fibrolite>

known landmark in Christchurch walkers as they are a prominent feature of the bay and its popular coastal walk.

ARCHAEOLOGICAL AND SCIENTIFIC SIGNIFICANCE

Archaeological or scientific values that demonstrate or are associated with: the potential to provide information through physical or scientific evidence and understanding about social historical, cultural, spiritual, technological or other values of past events, activities, structures or people.

Bach 51 and its setting are of archaeological significance because they have the potential to provide archaeological evidence relating to past building construction methods and materials, and human activity on the site. There was no known Māori settlement at Taylor's Mistake (Te Onepoto/short beach), but it was likely to have been employed in mahinga kai (food gathering). Baches were developed in the area from the turn of the 20th century.

ASSESSMENT STATEMENT

Bach 51 and its setting are of overall heritage significance to Christchurch, including Banks Peninsula.

The bach has historical and social significance as a reflection of aspects of patterns of recreation and leisure in mid-20th century New Zealand; for its association with prominent TMSLC figure Norm Batchelor, and long association with the MacDonald family; and as part of the Taylor's Mistake bach community – well-known in Christchurch. It has cultural significance for the manner in which it signifies the informal do-it-yourself bach way of life of the early and mid-20th century, for its association with surf lifesaving and for its frequent artistic representation. The building has architectural and aesthetic significance as a representative example of the small vernacular dwellings commonly built to serve as baches in the early and middle years of the 20th century, individual and particular to their sites and altered over time. The bach has technological significance as a vernacular building, reflecting the building techniques and materials of the early and mid-20th century. It has contextual significance on its site and within its setting, for its relationship to the landscape and bay, and for its shared physical characteristics with the landmark group of baches known as the West End, of which it is a key contributor. The bach and its setting are of archaeological significance because they have the potential to provide archaeological evidence relating to past building construction methods and materials, and human activity on the site.

REFERENCES:

R. Cairns; B. Turpin *Guardians of the Mistake: the history of the Taylor's Mistake Surf Life Saving Club 1916-1991*

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**CHRISTCHURCH DISTRICT PLAN – SCHEDULED HERITAGE PLACE
HERITAGE ASSESSMENT – STATEMENT OF SIGNIFICANCE
HERITAGE ITEM NUMBER 1448
*BACH AND SETTING - 52 TAYLOR'S MISTAKE BAY,
SCARBOROUGH***



PHOTOGRAPH: G. WRIGHT, 2017

HISTORICAL AND SOCIAL SIGNIFICANCE

Historical and social values that demonstrate or are associated with: a particular person, group, organisation, institution, event, phase or activity; the continuity and/or change of a phase or activity; social, historical, traditional, economic, political or other patterns.

Bach 52, West End, has historical and social significance as a reflection of patterns of recreation and leisure in early and mid-20th century New Zealand; for its associations with prominent Taylor's Mistake Surf Life Saving Club (TMSLC) personality and early Olympic representative Len Moorhouse, and as part of the Taylor's Mistake bach community – well-known in Christchurch.

West of the group of baches at Taylor's Mistake known as Rotten Row, between the Surf Club Pavilion and the rocky outcrop of Hobson's Point is an area known as West End. This contains a number of baches; some built on the sandy foreshore and others on the steep rock of the Point. Bach 52 is located in an elevated position at the southern end of the Point.

The origins of Bach 52 are uncertain, but research to date suggests that it is likely to have been built in the years around World War I. It was in-situ by the beginning of the 1920s. The first owner or owners have not been determined, but by 1932 it was owned by Len Moorhouse.

Leonard Moorhouse took up competitive swimming at the age of 18 with the Christchurch Amateur Swimming Club (CASC). As reigning New Zealand backstroke champion he

competed in the 100M backstroke event at the 1928 Amsterdam Olympics. He was also selected for the inaugural British Empire Games in Canada in 1930, but was unable to attend. At around the same time that he joined the CASC, Len also joined the New Brighton Surf Life Saving Club, but moved to the Taylor's Mistake SLSC, supported by Jim Ballin, the presiding president of the TMSLC and boss of Ballin's Brewery – where Len worked as an accountant. Moorhouse was a force within the TMSLC through until the late 1930s.

Moorhouse passed his bach onto an A. Wakelin; a fellow Ballin's employee, in the late 1930s.¹ Along with other baches in Taylors Mistake bach 52 was requisitioned during the war and was not returned to Wakelin until mid-1943.

After the war, Wakelin sold his bach to Horace and Emily Chapman. Horace was a fitter with NZ Railways. The Chapman family had been holidaying at Taylor's Mistake for some years in rented baches before 52 was purchased. In the mid-1980s, the Chapman bach came under threat when the Drainage Board proposed siting a sewer pipeline through the property, but this did not eventuate. After his parents passed away in 1986 Horace and Emily's son Ron sold Bach 52 to present owners Lynn and Tim Cook.

CULTURAL AND SPIRITUAL SIGNIFICANCE

Cultural and spiritual values that demonstrate or are associated with the distinctive characteristics of a way of life, philosophy, tradition, religion, or other belief, including: the symbolic or commemorative value of the place; significance to Tangata Whenua; and/or associations with an identifiable group and esteemed by this group for its cultural values.

Bach 52 has cultural significance for the manner in which it signifies the informal self-sufficient bach way of life of the early and mid-20th century, and as part of the area's frequent artistic representation. The bach way of life is held to represent values which are quintessentially 'kiwi' representing the New Zealand culture of 'do it yourself' and connecting with the natural environment. Bach 52 is valued by its present custodians, whose family have owned it for over 30 years.

One particular aspect of the kiwi bach way of life represented by many of the Taylor's Mistake baches (including Bach 52) is a connection with surf lifesaving – a recreation which has played a pivotal role in fostering beach and bach culture. The TMSLC was formed in 1916 in the first wave of surf club establishment that followed the Edwardian enthusiasm for sea bathing, and has been one of the strongest clubs in New Zealand ever since. The club's biggest annual event is the Kesteven Cup, held regularly since 1918. The baches at Taylor's have always played a big part in the success of their local surf club, providing a pool from which members are drawn and through which memberships are maintained. The fact that many baches have been owned by the same families through multiple generations has contributed to a distinct family culture at the TMSLC. While the baches have contributed to the well-being of the TMSLC, the relationship has been two-way, and the club has also provided an on-going community focus for bach owners over the last century.

The public esteem for the wider Taylor's Mistake area has been regularly and consistently demonstrated by its representation in the visual media through the years as an archetypal bach community. In the middle decades of the 20th century, the bay was an accessible subject for the 'Canterbury School' of regionalist painters. The most well-known of these paintings is Bill Sutton's *Untitled (Taylor's Mistake)* of the late 1940s. The bay has also been depicted by Francis Shurrock, Rosa Sawtell, Doris Lusk, and Cecil and Elizabeth Kelly. Since the 1980s, nostalgia for and celebration of the traditional bach way of life has seen Taylor's Mistake baches frequently depicted in picture books and other popular media. This exposure has contributed to Taylor's Mistake becoming one of New Zealand's better-known and most iconic beach settlements.

¹ Moorhouse resumed bach ownership at Taylor's Mistake for a short period after the war with the much larger Bach 54 (now destroyed).

ARCHITECTURAL AND AESTHETIC SIGNIFICANCE

Architectural and aesthetic values that demonstrate or are associated with: a particular style, period or designer, design values, form, scale, colour, texture and material of the place.

Bach 52 has architectural and aesthetic significance as a representative example of what is now considered a distinctive sub-group of New Zealand architecture, the small vernacular dwellings commonly built (and often subsequently altered) to serve as baches in the early and middle years of the 20th century.

Baches were usually owner built and designed without formal plans (or planning), constructed of locally-sourced, affordable or found materials, and often later altered and adapted to suit owners' needs as required. Bach design was usually individual and particular to the site, with design and style reflecting the notions, needs and means of their owners. Many of the first generation of baches were formed from shore-line caves. The remote location of many Taylor's Mistake baches - where most materials had to be carried or boated in - encouraged the use of lightweight materials and whatever was immediately to hand. By mid-century, baches were usually more substantial structures, built of commercial materials such as fibre cement cladding (Fibrolite/Polite), possibly as a result of changing building code requirements. Although they were more akin to permanent dwellings, these baches resembled their predecessors in so far as they were usually designed by their owners and generally did not follow typical domestic models. Built for an informal lifestyle, they tended to adhere more to a mid-century art deco or modernist-derived aesthetic, with features such as mono-pitch roofs, open-plan layouts and indoor-outdoor flow.

Bach 52 reflects the typology and characteristics of the 'kiwi' bach in its simple forms and materials. When constructed in the mid-1910s, Bach 52 was a small skillion-roofed weatherboard hut of probably one room like most of the earliest baches at Taylor's Mistake. In the middle years of the 20th century, the bach was extended substantially to the south, effectively tripling its size. Unlike many other baches in the area that were altered around this time it retains its weatherboard cladding and lean-to roof and consists primarily of one main structure with a small section extending out to the rear. Rather than a timber deck it has concrete paths and areas to the north east and south east.

TECHNOLOGICAL AND CRAFTSMANSHIP SIGNIFICANCE

Technological and craftsmanship values that demonstrate or are associated with: the nature and use of materials, finishes and/or technological or constructional methods which were innovative, or of notable quality for the period.

Bach 52 has technological and craftsmanship significance as a vernacular building, reflecting the building techniques and materials of the early and mid-20th century. The changes over time followed the trend of building more permanent baches. The choice of timber as the main construction material is comparable with the majority of baches built at Taylor's Mistake at this time, and many other baches around New Zealand, such as Rangitoto and Tongaporutu River. It is notable in this context though that the mid-20th century extension did not use the cheaper fibrolite of the time as other baches in the area did, but retained its original material. The building is constructed on an area supported by retaining walls with a flight of steps required to access it, necessitating some engineering ingenuity by the original builder. That it survived the Canterbury earthquakes is evidence of the care taken in the construction of its base.

CONTEXTUAL SIGNIFICANCE

Contextual values that demonstrate or are associated with: a relationship to the environment (constructed and natural), a landscape, setting, group, precinct or streetscape; a degree of consistency in terms of type, scale, form, materials, texture, colour, style and/or detail; recognised landmarks and landscape which are recognised and contribute to the unique identity of the environment.

Bach 52 has contextual significance on its site and within its setting. The contextual significance of the bach is derived partly from its location in the coastal landscape, and partly from its association with the other small scale and informally-built baches of Taylor's Mistake.

The bach is located on the hillside behind the Taylor's Mistake beach, in the area known as West End. The baches at the West End are tucked in to the cliff, with bush and scrub behind – either located directly on the beach, or up on the cliff. They are commonly timber weatherboard or fibrolite construction, with corrugated iron roofs and timber framed windows and doors. Most of the baches are single storied, one is a mix of single and two storied sections. Roof forms are gabled or mono pitched, or a mix of the two where there are later additions. Colours are predominantly light or dark tones. The baches located up on the cliff feature retaining walls and access stairs. Forms are generally rectangular and horizontal, extending across in line with the cliff.

Bach 52 relates to this group in terms of its design, scale, form, materials, texture and location and is a key contributor to the group. The group of baches of Taylor's Mistake are a well-known landmark in Christchurch as they are a prominent feature of the bay and its popular coastal walk.

ARCHAEOLOGICAL AND SCIENTIFIC SIGNIFICANCE

Archaeological or scientific values that demonstrate or are associated with: the potential to provide information through physical or scientific evidence and understanding about social historical, cultural, spiritual, technological or other values of past events, activities, structures or people.

Bach 52 and its setting are of archaeological significance because they have the potential to provide archaeological evidence relating to past building construction methods and materials, and human activity on the site. There was no known Māori settlement at Taylor's Mistake (Te Onepoto/short beach), but the area was likely to have been employed in mahinga kai (food gathering). Baches were developed in the area from the turn of the 20th century.

ASSESSMENT STATEMENT

Bach 52 and its setting are of overall heritage significance to Christchurch, including Banks Peninsula. The bach has historical and social significance as a reflection of aspects of patterns of recreation and leisure in mid-20th century New Zealand; for its association with prominent TMSLC figure and early Olympic representative Len Moorhouse; and as part of the Taylor's Mistake bach community well-known in Christchurch. The building has cultural significance for the manner in which it signifies the informal do-it-yourself bach way of life of the early and mid-20th century, for its connection with surf lifesaving and for the frequent artistic representation of the group of baches. It has architectural and aesthetic significance as a representative example of the small vernacular dwellings commonly built to serve as baches in the early and middle years of the 20th century, individual and particular to their sites and altered over time.. The bach has technological significance as a vernacular building, reflecting the building techniques and materials of the early and mid-20th century, along with some ingenuity relating to its position on a base supported by retaining walls. It has contextual significance on its site and within its setting, for its relationship to the landscape and bay, and for its shared physical characteristics with the landmark group of baches known as the West End, of which it is a key contributor. The bach and its setting are of archaeological significance because they have the potential to provide archaeological evidence relating to past building construction methods and materials, and human activity on the site.

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R. Cairns; B. Turpin *Guardians of the Mistake: the history of the Taylor's Mistake Surf Life Saving Club 1916-1991*

P. Carpinter; K. Tutty *Taylor's Mistake - Over the Hill for 100 Years: a history of Taylor's Mistake Surf Life Saving Club 1916-2016*

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Paul Thompson *The Bach* (1985)

Kevyn Male's *Good Old Kiwi Baches* (2001)

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**CHRISTCHURCH DISTRICT PLAN – SCHEDULED HERITAGE PLACE
HERITAGE ASSESSMENT – STATEMENT OF SIGNIFICANCE
HERITAGE ITEM NUMBER 1449
*BACH AND SETTING - 55 TAYLOR’S MISTAKE BAY,
SCARBOROUGH***



PHOTOGRAPH: G. WRIGHT, 2017

HISTORICAL AND SOCIAL SIGNIFICANCE

Historical and social values that demonstrate or are associated with: a particular person, group, organisation, institution, event, phase or activity; the continuity and/or change of a phase or activity; social, historical, traditional, economic, political or other patterns.

Bach 55, Shangi-La, has historical and social significance as a reflection of patterns of recreation and leisure in early and mid-20th century New Zealand; for its associations with prominent Taylor’s Mistake Surf Lifesaving Club (TMSLC) personality Daryl Neate, and as part of the Taylor’s Mistake bach community – well-known in Christchurch.

West of the group of baches at Taylor’s Mistake known as Rotten Row, between the Surf Club Pavilion and the rocky outcrop of Hobson’s Point is an area known as West End. This contains a number of baches; some built on the sandy foreshore and others on the steep rock of the Point. Bach 55 is located in an elevated position at the southern end of the Point.

The origins of Bach 55 are uncertain, but it was in-situ by the beginning of the 1920s. The first owner or owners have not been determined, but by 1932 it was owned by R. Carpenter. Research to date suggests this was Ronald (Ron) Carpenter, a motor cycle mechanic and competitive motor cycle racer of the late 1920s and 1930s.

During World War II when baches were requisitioned by the army for billeting soldiers bach 55 was not – research to date suggests that this may have been because it was serving as a

dedicated 'Surf Club Hut' at the time.¹ After the war, Bach 55 passed into the possession of Herman Dunlop. Dunlop was the son of a publican and was briefly a licensee himself before joining the police force in the late 1930s. Like Ron Carpenter, he was also a motor cycle racer in his youth. When Dunlop relinquished his bach around 1950, it passed briefly to Mr P. Smith before being purchased by car dealer Victor Neate and his wife Zella in c1955. Their son Daryl joined the TMSLC as a 'nipper' in the late 1950s, and became one of the club's (and indeed New Zealand's) most successful competitors. During a 40 year career he won 35 gold, 22 silver, and 21 bronze medals at National Championships, and represented New Zealand twice (in South Africa in 1973 and Australia in 1974). Away from competition, Neate served the TMSLC as a patroller and coach, and was Club Captain 1971-1974. He was inducted into the NZ Surf Life Saving Hall of Fame in 1985, and was made a Life Member of the TMSLC in 2017. Bach 55 remains in the Neate family.²

CULTURAL AND SPIRITUAL SIGNIFICANCE

Cultural and spiritual values that demonstrate or are associated with the distinctive characteristics of a way of life, philosophy, tradition, religion, or other belief, including: the symbolic or commemorative value of the place; significance to Tangata Whenua; and/or associations with an identifiable group and esteemed by this group for its cultural values.

Bach 55 has cultural significance for the manner in which it signifies the informal self-sufficient bach way of life of the early and mid-20th century, for its longevity of ownership within one family, its direct connections with the TMSLC and as part of the area's frequent artistic representation. The bach way of life is held to represent values which are quintessentially 'kiwi' representing the New Zealand culture of 'do it yourself' and connecting with the natural environment. Bach 55 is valued by its present custodians, whose family have owned it for over 60 years.

One particular aspect of the kiwi bach way of life represented by many of the Taylor's Mistake baches (including Bach 55) is a connection with surf lifesaving – a recreation which has played a pivotal role in fostering beach and bach culture. The TMSLC was formed in 1916 in the first wave of surf club establishment that followed the Edwardian enthusiasm for sea bathing, and has been one of the strongest clubs in New Zealand ever since. The club's biggest annual event is the Kesteven Cup, held regularly since 1918. The baches at Taylor's have always played a big part in the success of their local surf club, providing a pool from which members are drawn and through which memberships are maintained. The fact that many baches have been owned by the same families through multiple generations has contributed to a distinct family culture at the TMSLC. While the baches have contributed to the well-being of the TMSLC, the relationship has been two-way, and the club has also provided an on-going community focus for bach owners over the last century.

The public esteem for the wider Taylor's Mistake area has been regularly and consistently demonstrated by its representation in the visual media through the years as an archetypal bach community. In the middle decades of the 20th century, the bay was an accessible subject for the 'Canterbury School' of regionalist painters. The most well-known of these paintings is Bill Sutton's *Untitled (Taylor's Mistake)* of the late 1940s. The bay has also been depicted by Francis Shurrock, Rosa Sawtell, Doris Lusk, and Cecil and Elizabeth Kelly. Since the 1980s, nostalgia for and celebration of the traditional bach way of life has seen Taylor's Mistake baches frequently depicted in picture books and other popular media. This exposure has contributed to Taylor's Mistake becoming one of New Zealand's better-known and most iconic beach settlements.

ARCHITECTURAL AND AESTHETIC SIGNIFICANCE

Architectural and aesthetic values that demonstrate or are associated with: a particular style, period or designer, design values, form, scale, colour, texture and material of the place.

Bach 55 has architectural and aesthetic significance as an example of what is now considered a distinctive sub-group of New Zealand architecture, the vernacular dwellings

¹ Army – Hut Owners List, c1942 (TMA archive)

² TMSLC website – Life Members

commonly built (and often subsequently altered) to serve as baches in the middle years of the 20th century.

Such dwellings were usually owner built and designed without formal plans (or planning), constructed of locally-sourced, affordable or found materials, and often later altered and adapted to suit owners' needs as required. Bach design was usually individual and particular to the site, with design and style reflecting the notions, needs and means of their owners. Many of the first generation of baches were formed from shore-line caves. The remote location of many Taylor's Mistake baches - where most materials had to be carried or boated in - encouraged the use of lightweight materials and whatever was immediately to hand. By mid-century, baches were usually more substantial structures, built of commercial materials such as fibre cement cladding (Fibrolite/Polite), possibly as a result of changing building code requirements. Although they were more akin to permanent dwellings, these baches resembled their predecessors in so far as they were usually designed by their owners and generally did not follow typical domestic models. Built for an informal lifestyle, they tended to adhere more to a mid-century art deco or modernist-derived aesthetic, with features such as mono-pitch roofs, open-plan layouts and indoor-outdoor flow.

Bach 55 reflects the typology and characteristics of the 'kiwi' bach in its simple forms and materials. When constructed in the mid-1910s, Bach 55 was a small skillion-roofed weatherboard hut of probably two rooms. In the middle years of the 20th century, the bach followed the growing trend of the time and was rebuilt into a substantial fibrolite dwelling, making it the largest of the Taylor's Mistake baches. The bach sits on a substantial concrete base which creates a deck area extending across the beach frontage. Windows are timber framed, and dominate the beach frontage. The name is spelt out on a sign attached to the fascia board.

TECHNOLOGICAL AND CRAFTSMANSHIP SIGNIFICANCE

Technological and craftsmanship values that demonstrate or are associated with: the nature and use of materials, finishes and/or technological or constructional methods which were innovative, or of notable quality for the period.

Bach 55 has technological and craftsmanship significance as a vernacular building, reflecting the building techniques and materials of the mid-20th century. The enlargement followed the trend of building more permanent baches. The use of bought (rather than found) materials may have been a response to building regulations, as noted above, and the availability of materials such as fibrolite, which could be easily flat packed and carted, enabled construction at less cost than more traditional materials. Fibrolite fell out of favour in the 1970s and 80s³.

The building is constructed on an area supported by retaining walls necessitating some engineering ingenuity by the original builder which has been updated over time. This has ensured it survived the Canterbury earthquakes.

CONTEXTUAL SIGNIFICANCE

Contextual values that demonstrate or are associated with: a relationship to the environment (constructed and natural), a landscape, setting, group, precinct or streetscape; a degree of consistency in terms of type, scale, form, materials, texture, colour, style and/or detail; recognised landmarks and landscape which are recognised and contribute to the unique identity of the environment.

Bach 55 has contextual significance on its site and within its setting. The contextual significance of the bach is derived partly from its location in the coastal landscape, and partly from its association with the other small scale and informally-built baches of Taylor's Mistake.

The bach is located on the hillside behind the Taylor's Mistake beach, in the area known as West End. The baches at the West end are tucked in to the cliff, with bush and scrub behind – either located directly on the beach, or up on the cliff. They are commonly timber weatherboard or fibrolite construction, with corrugated iron roofs and timber framed windows

³ <https://teara.govt.nz/en/ephemera/38658/fibrolite>

and doors. Most of the baches are single storied, with one a mix of single and two storied sections. Roof forms are gabled or mono pitched, or a mix of the two where there are later additions. Colours are predominantly light or dark tones. The baches located up on the cliff feature retaining walls and access stairs. Forms are generally rectangular and horizontal, extending across in line with the cliff.

Bach 55 relates strongly to this group in terms of its design, form, scale, materials, texture and location and is a key contributor to the group. The group of baches of Taylor's Mistake are a well-known landmark in Christchurch as they are a prominent feature of the bay and its popular coastal walk.

ARCHAEOLOGICAL AND SCIENTIFIC SIGNIFICANCE

Archaeological or scientific values that demonstrate or are associated with: the potential to provide information through physical or scientific evidence and understanding about social historical, cultural, spiritual, technological or other values of past events, activities, structures or people.

Bach 55 and its setting are of archaeological significance because they have the potential to provide archaeological evidence relating to past building construction methods and materials, and human activity on the site. There was no known Māori settlement at Taylor's Mistake (Te Onepoto/short beach), but it likely to have been employed in mahinga kai (food gathering). Baches were developed in the area from the turn of the 20th century.

ASSESSMENT STATEMENT

Bach 55 and its setting are of overall heritage significance to Christchurch, including Banks Peninsula.

The bach has historical and social significance as a reflection of patterns of recreation and leisure in mid-20th century New Zealand; for its association with prominent TMSLC figure Daryl Neate; and as part of the Taylor's Mistake bach community – well-known in Christchurch. It has cultural significance for the manner in which it signifies the informal do-it-yourself bach way of life of the early and mid-20th century, its direct connections with the surf lifesaving, for its longevity of ownership within one family, and for the area's frequent artistic representation. The building has architectural and aesthetic significance as an example of the vernacular dwellings commonly built to serve as baches in the middle years of the 20th century, individual and particular to their sites. The bach has technological significance as a vernacular building, reflecting the building techniques and materials of the mid-20th century. It has contextual significance on its site and within its setting, for its relationship to the landscape and bay, and for its shared physical characteristics with the group of baches known as West End. The bach and its setting are of archaeological significance because they have the potential to provide archaeological evidence relating to past building construction methods and materials, and human activity on the site.

REFERENCES:

R. Cairns; B. Turpin *Guardians of the Mistake: the history of the Taylor's Mistake Surf Life Saving Club 1916-1991*

P. Carpinter; K. Tutty *Taylor's Mistake - Over the Hill for 100 Years: a history of Taylor's Mistake Surf Life Saving Club 1916-2016* B. Mortlock, *Life History Report. An appendix to The Taylors Mistake Bach Holders Community Assessment*, 1998

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Taylor's Mistake Association files (privately held)

World War I Military Personnel Files (Archives New Zealand) *Births, Deaths and Marriages* website

Papers Past website

Te Ara Encyclopaedia of New Zealand <https://teara.govt.nz>

'Life Members' Taylor's Mistake Surf Lifesaving Club website

Wises Street Directories (accessed via Ancestry website)

Pers. comm. Janet Abbott

Paul Thompson *The Bach* (1985)

Kevyn Male's *Good Old Kiwi Baches* (2001)

REPORT DATED: 7 OCTOBER 2021

PLEASE NOTE THIS ASSESSMENT IS BASED ON INFORMATION AVAILABLE AT THE TIME OF WRITING. DUE TO THE ONGOING NATURE OF HERITAGE RESEARCH, FUTURE REASSESSMENT OF THIS HERITAGE ITEM MAY BE NECESSARY TO REFLECT ANY CHANGES IN KNOWLEDGE AND UNDERSTANDING OF ITS HERITAGE SIGNIFICANCE.

PLEASE USE IN CONJUNCTION WITH THE CHRISTCHURCH CITY COUNCIL HERITAGE FILES.

**CHRISTCHURCH DISTRICT PLAN – SCHEDULED HERITAGE PLACE
HERITAGE ASSESSMENT – STATEMENT OF SIGNIFICANCE
HERITAGE ITEM NUMBER 1450
*BACH AND SETTING - 58 TAYLOR’S MISTAKE BAY,
SCARBOROUGH***



PHOTOGRAPH: G. WRIGHT, 2017

HISTORICAL AND SOCIAL SIGNIFICANCE

Historical and social values that demonstrate or are associated with: a particular person, group, organisation, institution, event, phase or activity; the continuity and/or change of a phase or activity; social, historical, traditional, economic, political or other patterns.

Bach 58 has historical and social significance as a reflection of patterns of recreation and leisure in early and mid-20th century New Zealand; for its connection with the earlier history of the Taylor's Mistake Surf Club; for its connection with sportsman and caterer Alec Thompson; and as part of the Taylor's Mistake bach community – well-known in Christchurch.

Bach 58 is perched on a terrace at the nose of the 'The Point' which divides the West End of the 'Big Bay' at Taylor's Mistake from Hobson's Bay. The present bach dates from 1936.

The earliest history of Bach 58 – like that of many of the Taylor's Mistake baches – is uncertain, but it was in-situ by 1921. By 1932 it was owned by Alexander (Alec) Thompson. Thompson took up the sport of boxing, becoming a successful welter-weight fighter in the city during the 1920s. After retiring from the ring, he became a trainer and operated his own gymnasium during the 1930s. In 1936 he helped found the Marist Old Boys Boxing Club, and in 1939 he was on the committee of the Christchurch Boxing Trainers Association. In addition to boxing, Alec Thompson also joined the Taylor's Mistake Surf Life Saving Club (TMSLC) in the 1920s and became a regular competitor. In the early 1930s Alec leased his bach to a

group of young TMSLC members known collectively as the 'The Bashful Boys'.¹ He then applied to the Sumner Borough Council for permission to build a new hut on the former tearooms site, close to the surf club pavilion. This was denied on the basis of a 1923 council decision that no further baches be permitted in this locality because of the impediment they posed to public access to the beach.² Subsequent to this decision Thompson returned to Bach 58, which he rebuilt in 1936.³

During World War II the new Bach 58 was occupied from 11 December 1941 until April 1943; a period for which the Thompsons were paid £44/2/2 in rent.

The Thompsons retained their bach for 40 years until the late 1970s, when it was sold to Mrs Claydon, proprietor of the Marine Service Station in Sumner. The present owners acquired it in the 1990s.

CULTURAL AND SPIRITUAL SIGNIFICANCE

Cultural and spiritual values that demonstrate or are associated with the distinctive characteristics of a way of life, philosophy, tradition, religion, or other belief, including: the symbolic or commemorative value of the place; significance to Tangata Whenua; and/or associations with an identifiable group and esteemed by this group for its cultural values.

Bach 58 has cultural significance for the manner in which it signifies the informal self-sufficient bach way of life of the early and mid-20th century, for its links with the TMSLC, its longevity of ownership within one family, and the area's frequent artistic representation. The bach way of life is held to represent values which are quintessentially 'kiwi' representing the New Zealand culture of 'do it yourself' and connecting with the natural environment.

One particular aspect of the kiwi bach way of life represented by many of the Taylor's Mistake baches (including Bach 58) is the connection with surf lifesaving – a recreation which has played a pivotal role in fostering beach and bach culture. The TMSLC was formed in 1916 in the first wave of surf club establishment that followed the Edwardian enthusiasm for sea bathing, and has been one of the strongest clubs in New Zealand ever since. The club's biggest annual event is the Kesteven Cup, held regularly since 1918. The baches at Taylor's have always played a big part in the success of their local surf club, providing a pool from which members are drawn and through which memberships are maintained. The fact that many baches have been owned by the same families through multiple generations has contributed to a distinct family culture at the TMSLC. While the baches have contributed to the well-being of the TMSLC, the relationship has been two-way, and the club has also provided an on-going community focus for bach owners over the last century.

The public esteem for the wider Taylor's Mistake area has been regularly and consistently demonstrated by its representation in the visual media through the years as an archetypal bach community. In the middle decades of the 20th century, the bay was an accessible subject for the 'Canterbury School' of regionalist painters. The most well-known of these paintings is Bill Sutton's *Untitled (Taylor's Mistake)* of the late 1940s. The bay has also been depicted by Francis Shurrock, Rosa Sawtell, Doris Lusk, and Cecil and Elizabeth Kelly. Since the 1980s, nostalgia for and celebration of the traditional bach way of life has seen Taylor's Mistake baches frequently depicted in picture books and other popular media. This exposure has contributed to Taylor's Mistake becoming one of New Zealand's better-known and most iconic beach settlements.

ARCHITECTURAL AND AESTHETIC SIGNIFICANCE

Architectural and aesthetic values that demonstrate or are associated with: a particular style, period or designer, design values, form, scale, colour, texture and material of the place.

Bach 58 has architectural and aesthetic significance as an example of what is now considered a distinctive sub-group of New Zealand architecture, the vernacular dwellings

¹ Tutty and Carpinter p 63.

² Sumner Borough Council minutes 09/12/1930.

³ Ibid 29/01/1936

commonly built (and often subsequently altered) to serve as baches in the middle years of the 20th century.

Such dwellings were usually owner built and designed without formal plans (or planning), constructed of locally-sourced, affordable or found materials, and often later altered and adapted to suit owners' needs as required. Bach design was usually individual and particular to the site, with design and style reflecting the notions, needs and means of their owners. Many of the first generation of baches were formed from shore-line caves. The remote location of many Taylor's Mistake baches - where most materials had to be carried or boated in - encouraged the use of lightweight materials and whatever was immediately to hand. By mid-century, baches were usually more substantial structures, built of commercial materials such as fibre cement cladding (Fibrolite/Polite), possibly as a result of changing building code requirements. Although they were more akin to permanent dwellings, these baches resembled their predecessors in so far as they were usually designed by their owners and generally did not follow typical domestic models. Built for an informal lifestyle, they tended to adhere more to a mid-century art deco or modernist-derived aesthetic, with features such as mono-pitch roofs, open-plan layouts and indoor-outdoor flow.

Bach 58 reflects the typology and characteristics of the 'kiwi' bach in its simple forms and materials. No clear images of the first Bach 58 have been sighted, but it appears to have been a small lean-to structure. By 1930 this had either been replaced or altered and had a gabled roof. The bach as it stands today is the larger rusticated weatherboard hip-roofed building that Alec Thompson built or rebuilt in 1936. Subsequent alterations include new windows inserted in the 1960s or 1970s. In terms of the evolution of bach design at Taylor's Mistake, it marks the transition between the simple lean-to's of the 1910s and 1920s and the more substantial fibrolite dwellings of the post-war period.

TECHNOLOGICAL AND CRAFTSMANSHIP SIGNIFICANCE

Technological and craftsmanship values that demonstrate or are associated with: the nature and use of materials, finishes and/or technological or constructional methods which were innovative, or of notable quality for the period.

Bach 58 has technological and craftsmanship significance as a vernacular building, reflecting traditional building techniques and materials of the mid-20th century. The changes over time followed the trend of building more permanent baches. The use of bought (rather than found) materials may have been a response to building regulations, as noted above.

CONTEXTUAL SIGNIFICANCE

Contextual values that demonstrate or are associated with: a relationship to the environment (constructed and natural), a landscape, setting, group, precinct or streetscape; a degree of consistency in terms of type, scale, form, materials, texture, colour, style and/or detail; recognised landmarks and landscape which are recognised and contribute to the unique identity of the environment.

Bach 58 has contextual significance on its site and within its setting. The contextual significance of the bach is derived partly from its location in the coastal landscape, and partly from its association with the other small scale and informally-built baches of Taylor's Mistake.

The bach is prominently located on the toe of 'The Point' separating the West End of Taylor's Mistake's 'Big Bay' from Hobson Bay. Low cliffs fall to the sea in front of the building. The four baches at The Point are closely co-located. Rocky or concrete retaining walls and steps provide support and access. Decks are a common feature of these baches. They are predominantly light in colour, although one is painted dark tones. Window and doors are timber framed, with some later windows in aluminium. Roofs are clad in corrugated iron, and are mono pitched or low pitched hipped forms. Cladding is in weatherboard, corrugated iron or fibrolite and is sometimes mixed. Bach forms are boxy and rectangular.

Bach 58 relates strongly to this group in terms of its design, form, scale, materials, texture and location and is a key contributor to the group.

The group of baches of Taylor's Mistake are a well-known landmark in Christchurch as they are a prominent feature of the bay and its a popular coastal walk.

ARCHAEOLOGICAL AND SCIENTIFIC SIGNIFICANCE

Archaeological or scientific values that demonstrate or are associated with: the potential to provide information through physical or scientific evidence and understanding about social historical, cultural, spiritual, technological or other values of past events, activities, structures or people.

Bach 58 and its setting are of archaeological significance because they have the potential to provide archaeological evidence relating to past building construction methods and materials, and human activity on the site. There was no known Māori settlement at Taylor's Mistake (Te Onepoto/short beach), but it was likely to have been employed in mahinga kai (food gathering). Baches were developed in the area from the turn of the 20th century.

ASSESSMENT STATEMENT

Bach 58 and its setting are of overall heritage significance to Christchurch, including Banks Peninsula.

The bach has historical and social significance as a reflection of patterns of recreation and leisure in early and mid-20th century New Zealand; for its connection with the earlier history of the Taylor's Mistake Surf Life Saving Club; for its links with sportsman and caterer Alec Thompson; and as part of the Taylor's Mistake bach community – well-known in Christchurch. It has cultural significance for the manner in which it signifies the informal do-it-yourself bach way of life of the early and mid-20th century, its longevity of ownership within one family, connections with surf lifesaving and the area's frequent artistic representation. The building has architectural and aesthetic significance as a representative example of the small vernacular dwellings commonly built to serve as baches in the middle years of the 20th century, individual and particular to their sites. The bach has technological significance as a vernacular building, reflecting the building techniques and materials of the mid-20th century baches in New Zealand. It has contextual significance on its site and within its setting, for its prominent location on The Point between Hobson's Bay and West End, and for its shared physical characteristics with baches in the immediate and wider area. The bach and its setting are of archaeological significance because they have the potential to provide archaeological evidence relating to past building construction methods and materials, and human activity on the site.

REFERENCES:

R. Cairns; B. Turpin *Guardians of the Mistake: the history of the Taylor's Mistake Surf Life Saving Club 1916-1991*

P. Carpinter; K. Tutty *Taylor's Mistake - Over the Hill for 100 Years: a history of Taylor's Mistake Surf Life Saving Club 1916-2016*

Papers Past website

Births, Deaths and Marriages website

Taylor's Mistake Association files (privately held)

Wises Street Directories (accessed via Ancestry website)

Pers. comm. Janet Abbott

Sumner Borough Council Minute Books (CCC Archives; formerly held at Archives New Zealand). Digest of references to Taylor's Mistake compiled by O. Snoop, 1993 (CCC files).

Paul Thompson *The Bach* (1985)

Kevyn Male's *Good Old Kiwi Baches* (2001)

REPORT DATED: 7 OCTOBER 2021

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PLEASE USE IN CONJUNCTION WITH THE CHRISTCHURCH CITY COUNCIL HERITAGE FILES.

**CHRISTCHURCH DISTRICT PLAN – SCHEDULED HERITAGE PLACE
HERITAGE ASSESSMENT – STATEMENT OF SIGNIFICANCE
HERITAGE ITEM NUMBER 1451
*BACH AND SETTING - 60 TAYLOR'S MISTAKE BAY,
SCARBOROUGH***



PHOTOGRAPH: G. WRIGHT, 2017

HISTORICAL AND SOCIAL SIGNIFICANCE

Historical and social values that demonstrate or are associated with: a particular person, group, organisation, institution, event, phase or activity; the continuity and/or change of a phase or activity; social, historical, traditional, economic, political or other patterns.

Bach 60 has historical and social significance as a reflection of patterns of recreation and leisure in early and mid-20th century New Zealand; for its association with Matthew Wilson and subsequent owners, and as part of the Taylor's Mistake bach community – well-known in Christchurch.

Bach 60 is perched on a terrace at the foot of the steep hillside at the eastern end of Hobson Bay, above the concrete steps which provide the principal access to the bay. The site of Bach 60 was initially the location of the hut belonging to early Taylor's Mistake identity 'Uncle' Cooper. Uncle - as everyone knew him – settled at Taylors Mistake in about 1913. An American, Uncle's origins and personal history are otherwise uncertain. His hut was known as 'Uncle's Halfway Tavern' as it was reputedly halfway between Sumner and the Godley Heads lighthouse.¹ Uncle died at the beginning of World War II.

In 1940, Matthew Wilson was granted permission by the Sumner Borough Council to build a new hut on Uncle's 'old site'. He also undertook to create steps over the brow of the hill to

¹ P. Carpinter; K. Tutty *Taylor's Mistake - Over the Hill for 100 Years: a history of Taylor's Mistake Surf Life Saving Club 1916-2016* pp 86-87.

enable better public access to Hobson's Bay, and to sell his previous hut.² During the 1930s Wilson was a member of the Taylor's Mistake Surf Life Saving Club (TMSLC). During World War II the new Bach 60 was occupied from 1 December 1941 until April 1943; a period for which the Wilsons were paid £44/2/2 in rent.

When Wilson died in 1962, Bach 60 passed to his wife. In the mid-1960s it was transferred to a Mr K. O'Keefe – who appears to have been resident in the Waikato. By the early 1970s it was owned by L. M. Reynolds of Papanui, and then by E. J. Little of Parklands. By the late 1970s, it had been purchased by Oliver and Juliana Brauer, the proprietors of the Sumner Pharmacy. After the Canterbury earthquake sequence of 2010-2011, it was sold to its present owners.

CULTURAL AND SPIRITUAL SIGNIFICANCE

Cultural and spiritual values that demonstrate or are associated with the distinctive characteristics of a way of life, philosophy, tradition, religion, or other belief, including: the symbolic or commemorative value of the place; significance to Tangata Whenua; and/or associations with an identifiable group and esteemed by this group for its cultural values.

Bach 60 has cultural significance for the manner in which it signifies the informal self-sufficient bach way of life of the early and mid-20th century, for its association with the TMSLC, and for the area's frequent artistic representation. The bach way of life is held to represent values which are quintessentially 'kiwi' representing the New Zealand culture of 'do it yourself' and connecting with the natural environment.

One particular aspect of the kiwi bach way of life represented by many of the Taylor's Mistake baches (including Bach 60) is a connection with surf lifesaving – a recreation which has played a pivotal role in fostering beach and bach culture. The TMSLC was formed in 1916 in the first wave of surf club establishment that followed the Edwardian enthusiasm for sea bathing, and has been one of the strongest clubs in New Zealand ever since. The club's biggest annual event is the Kesteven Cup, held regularly since 1918. The baches at Taylor's have always played a big part in the success of their local surf club, providing a pool from which members are drawn and through which memberships are maintained. The fact that many baches have been owned by the same families through multiple generations has contributed to a distinct family culture at the TMSLC. While the baches have contributed to the well-being of the TMSLC, the relationship has been two-way, and the club has also provided an on-going community focus for bach owners over the last century.

The public esteem for the wider Taylor's Mistake area has been regularly and consistently demonstrated by its representation in the visual media through the years as an archetypal bach community. In the middle decades of the 20th century, the bay was an accessible subject for the 'Canterbury School' of regionalist painters. The most well-known of these paintings is Bill Sutton's *Untitled (Taylor's Mistake)* of the late 1940s. The bay has also been depicted by Francis Shurrock, Rosa Sawtell, Doris Lusk, and Cecil and Elizabeth Kelly. Since the 1980s, nostalgia for and celebration of the traditional bach way of life has seen Taylor's Mistake baches frequently depicted in picture books and other popular media. This exposure has contributed to Taylor's Mistake becoming one of New Zealand's better-known and most iconic beach settlements.

ARCHITECTURAL AND AESTHETIC SIGNIFICANCE

Architectural and aesthetic values that demonstrate or are associated with: a particular style, period or designer, design values, form, scale, colour, texture and material of the place.

Bach 60 has architectural and aesthetic significance as an example of what is now considered a distinctive sub-group of New Zealand architecture, the vernacular dwellings

² Sumner Borough Council Minute Books 23 September 1940. The location of Matthew Wilson's previous hut has not been established, but it may have been between today's baches 62 and 63, which as 55 belonged to a Mrs L. Wilson in 1932, but does not appear in any later lists.

commonly built (and often subsequently altered) to serve as baches in the middle years of the 20th century.

Such dwellings were usually owner built and designed without formal plans (or planning), constructed of locally-sourced, affordable or found materials, and often later altered and adapted to suit owners' needs as required. Bach design was usually individual and particular to the site, with design and style reflecting the notions, needs and means of their owners. Many of the first generation of baches were formed from shore-line caves. The remote location of many Taylor's Mistake baches - where most materials had to be carried or boated in - encouraged the use of lightweight materials and whatever was immediately to hand. By mid-century, baches were usually more substantial structures, built of commercial materials such as fibre cement cladding (Fibrolite/Polite), possibly as a result of changing building code requirements. Although they were more akin to permanent dwellings, these baches resembled their predecessors in so far as they were usually designed by their owners and generally did not follow typical domestic models. Built for an informal lifestyle, they tended to adhere more to a mid-century art deco or modernist-derived aesthetic, with features such as mono-pitch roofs, open-plan layouts and indoor-outdoor flow.

Bach 60 reflects the typology and characteristics of the 'kiwi' bach in its simple forms and materials. It appears to have begun life in 1940 as a single-level weatherboard building of a couple of rooms. Later a fibre-cement first floor was added – accessed via an external stair and terrace. Research to date suggests that this would have been around 1966 when alterations were made to the bach, although exactly what they were is not known. As it stands today, the building fits the typical modernist mid-century bach typology, with its larger windows, mono-pitch roof and commercial materials. Windows are timber framed. The tight site encouraged the addition of a second floor; and a tall narrow form. In this regard it resembles its neighbours and contemporaries Baches 49 and 64. The bach was damaged during the Canterbury Earthquake sequence of 2010-2011 when the retaining wall in front gave way and was unoccupied for a period. The wall and building have been subsequently repaired.

TECHNOLOGICAL AND CRAFTSMANSHIP SIGNIFICANCE

Technological and craftsmanship values that demonstrate or are associated with: the nature and use of materials, finishes and/or technological or constructional methods which were innovative, or of notable quality for the period.

Bach 60 has technological and craftsmanship significance as a vernacular building, reflecting the building techniques and materials of the mid-20th century. The enlargement followed the trend of building more permanent baches and was constructed from fiber-cement rather than the original weatherboard. The use of bought (rather than found) materials may have been a response to building regulations, as noted above, and the availability of materials such as fibrolite, which could be easily flat packed and carted, enabled construction at less cost than more traditional materials, which is demonstrated in the upper storey of this bach. Fibrolite fell out of favour in the 1970s and 80s³ and is not found in later alterations to baches.

The building is constructed on an area supported by retaining walls necessitating some engineering ingenuity by the original builder which has been updated over time. Although this has required rebuilding after the Canterbury earthquakes it has been able to be repaired and the building has been retained.

CONTEXTUAL SIGNIFICANCE

Contextual values that demonstrate or are associated with: a relationship to the environment (constructed and natural), a landscape, setting, group, precinct or streetscape; a degree of consistency in terms of type, scale, form, materials, texture, colour, style and/or detail; recognised landmarks and landscape which are recognised and contribute to the unique identity of the environment.

³ <https://teara.govt.nz/en/ephemera/38658/fibrolite>

Bach 60 has contextual significance on its site and within its setting. The contextual significance of the bach is derived partly from its location in the coastal landscape, and partly from its association with the other small scale and informally-built baches of Taylor's Mistake.

The bach is located on a terrace at the foot of the steep slopes at the eastern end of Hobson's Bay, and set into the cliff face. The baches at Hobson's Bay are a mix of single and two stories, clad in Fibrolite, with some weatherboard. There are some two storied baches which are narrow and boxy in form. Conversely the single storied baches are strongly horizontal in form which is commonly emphasized by the balustraded decks along the frontage. Baches are set high into the rocky cliff faces or are perching on rocky outcrops. Some are set within the bush and scrub of the cliff. Their locations in the landscape often require steps up, retaining walls and thin support poles for the baches. Roof forms vary from gables to flat or mono pitched. Paint colours are generally neutral and light. Roofs are clad in corrugated iron, and windows are largely timber framed. The baches are spread out across the bay, separated by areas of scrubby cliff face.

Bach 60 relates strongly to the group of baches in Hobson's Bay and in particular to the other two storey baches nearby in terms of its design, form, scale, materials, texture and location and is a key contributor to the group. The retaining walls and stepped access are a key part of the setting of this bach as they are a reflection of the construction of the bach directly within the cliffscape and are a feature of this section of the larger bach group, as are the more neutral colours blending with the surroundings.

The group of baches of Taylor's Mistake are a well-known landmark in Christchurch as they are a prominent feature of the bay and its popular coastal walk.

ARCHAEOLOGICAL AND SCIENTIFIC SIGNIFICANCE

Archaeological or scientific values that demonstrate or are associated with: the potential to provide information through physical or scientific evidence and understanding about social historical, cultural, spiritual, technological or other values of past events, activities, structures or people.

Bach 60 and its setting are of archaeological significance because they have the potential to provide archaeological evidence relating to past building construction methods and materials, and human activity on the site. There was no known Māori settlement at Taylor's Mistake (Te Onepoto/short beach), but it likely to have been employed in mahinga kai (food gathering). Baches were developed in the area from the turn of the 20th century.

ASSESSMENT STATEMENT

Bach 66 and its setting are of overall heritage significance to Christchurch, including Banks Peninsula. The bach has historical and social significance as a reflection of patterns of recreation and leisure in early and mid-20th century New Zealand, for its connection with Matthew Wilson and other owners, and as part of the Taylor's Mistake bach community – well-known in Christchurch. It has cultural significance for the manner in which it signifies the informal do-it-yourself bach way of life of the early and mid-20th century, for the longevity of the family ownership associated with, its connection with surf lifesaving and for the public esteem in which the area is held as evidenced by its frequent artistic representation. The building has architectural and aesthetic significance as it typifies bach design of the early decades of the 20th century, and the common adaptation and alteration of baches over time. The bach has technological significance as a vernacular building, reflecting the building techniques and materials of the mid-20th century. It has contextual significance on its site and within its setting, for its relationship to the landscape, cliffside and bay, and for its shared physical characteristics with the group of baches in Hobson's Bay, of which it is a key contributor. The bach and its setting are of archaeological significance because they have the potential to provide archaeological evidence relating to past building construction methods and materials, and human activity on the site.

REFERENCES:

R. Cairns; B. Turpin *Guardians of the Mistake: the history of the Taylor's Mistake Surf Life Saving Club 1916-1991*

P. Carpinter; K. Tutty *Taylor's Mistake - Over the Hill for 100 Years: a history of Taylor's Mistake Surf Life Saving Club 1916-2016*

B. Mortlock, *Life History Report. An appendix to The Taylors Mistake Bach Holders Community Assessment*, 1998

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Births, Deaths and Marriages website

Papers Past website

Te Ara Encyclopaedia of New Zealand <https://teara.govt.nz>

Wises Street Directories (accessed via Ancestry website)

Pers. comm. Janet Abbott

Taylor's Mistake Association files (privately held)

Paul Thompson *The Bach* (1985)

Kevyn Male's *Good Old Kiwi Baches* (2001)

REPORT DATED: 13 OCTOBER 2021

PLEASE NOTE THIS ASSESSMENT IS BASED ON INFORMATION AVAILABLE AT THE TIME OF WRITING. DUE TO THE ONGOING NATURE OF HERITAGE RESEARCH, FUTURE REASSESSMENT OF THIS HERITAGE ITEM MAY BE NECESSARY TO REFLECT ANY CHANGES IN KNOWLEDGE AND UNDERSTANDING OF ITS HERITAGE SIGNIFICANCE.

PLEASE USE IN CONJUNCTION WITH THE CHRISTCHURCH CITY COUNCIL HERITAGE FILES.

**CHRISTCHURCH DISTRICT PLAN – SCHEDULED HERITAGE PLACE
HERITAGE ASSESSMENT – STATEMENT OF SIGNIFICANCE
HERITAGE ITEM NUMBER 1452
*BACH AND SETTING - 69 TAYLOR'S MISTAKE BAY,
SCARBOROUGH***



PHOTOGRAPH: G. WRIGHT, 2017

HISTORICAL AND SOCIAL SIGNIFICANCE

Historical and social values that demonstrate or are associated with: a particular person, group, organisation, institution, event, phase or activity; the continuity and/or change of a phase or activity; social, historical, traditional, economic, political or other patterns.

Bach 69 has historical and social significance as a reflection of patterns of recreation and leisure in early and mid-20th century New Zealand; for its associations with the early history of the Taylor's Mistake Life Saving Club, publican Alfred Barrett, his daughter and her family, and as part of the Taylor's Mistake bach community – well-known in Christchurch. It is also of historical significance for its connection with military defence history.

Bach 69 is located on a former pillbox beneath the cliffs of Hobson's Bay. It is the second bach on the site and dates from 1957.

Research to date suggests that the first Bach 69 was built by Alfred Barrett in the years around World War I. Barrett was publican at the New Zealander Hotel in St Asaph Street (1923-1930 and 1934-1943), with a period at the Hororata Hotel (1931-1933) in between. He was an inaugural member of the Taylor's Mistake Life Saving Club (TMSLC) in 1916 and served as first club captain and as an early instructor and patrolman. Barrett was closely involved with the construction of the first pavilion and was one of two club delegates who represented Taylor's Mistake at the first meeting of the Canterbury Surf Life Saving Association. Although his active involvement with the club appears to have wound down in the early 1920s Barrett later served as club patron for two periods (1943-1946 and 1947-1956) and maintained a bach at the Bay for another three decades.

During World War II Bach 69 was first occupied by troops between December 1941 and late 1942. Around 1941 a substantial pill box (also described as a gun emplacement) was constructed in front of Bach 69 to provide covering for machine gun fire across Hobson's Bay in case of a possible landing.

In about 1947 the bach was destroyed by a slip. Barrett subsequently purchased nearby Bach 64, which he retained until his death in 1957. The site of Bach 69 sat vacant for a decade until Mrs and Mr Dorreen (Mrs Dorreen was Barrett's daughter) of Sumner built a new Bach 69 on top of the redundant pillbox in 1957. The Dorreen children were involved with the TMSLC. After 50 years with the Dorreen family (and 90 years of family association with the site), Bach 69 was sold to Damon Hagaman in c.2009. A property investor and company director, Hagaman is a son of the late Earl Hagaman, owner of the Scenic Hotel Group.

The bach is unusual in the bay in that it came through the earthquakes undamaged and remains occupied. The only other Hobson's Bay bach that did so is Bach 70 which is built higher up on the hillside.

CULTURAL AND SPIRITUAL SIGNIFICANCE

Cultural and spiritual values that demonstrate or are associated with the distinctive characteristics of a way of life, philosophy, tradition, religion, or other belief, including: the symbolic or commemorative value of the place; significance to Tangata Whenua; and/or associations with an identifiable group and esteemed by this group for its cultural values.

Bach 69 has cultural significance for the manner in which it signifies the informal do-it-yourself bach way of life of the early and mid-20th century, for its longevity of ownership within one family, for its association with early surf lifesaving and for the public esteem in which the area was held as evidenced by its frequent artistic representation. The bach way of life is held to represent values which are quintessentially 'kiwi' representing the New Zealand culture of 'do it yourself' and connecting with the natural environment.

One particular aspect of the kiwi bach way of life represented by many of the Taylor's Mistake baches (including Bach 69) is a connection with surf lifesaving – a recreation which has played a pivotal role in fostering beach and bach culture. The TMSLC was formed in 1916 in the first wave of surf club establishment that followed the Edwardian enthusiasm for sea bathing, and has been one of the strongest clubs in New Zealand ever since. The club's biggest annual event is the Kesteven Cup, held regularly since 1918. The baches at Taylor's have always played a big part in the success of their local surf club, providing a pool from which members are drawn and through which memberships are maintained. The fact that many baches have been owned by the same families for long periods of time, as with Bach 69 has contributed to a distinct family culture at the TMSLC. While the baches have contributed to the well-being of the TMSLC, the relationship has been two-way, and the club has also provided an on-going community focus for bach owners over the last century.

The public esteem for the wider Taylor's Mistake area has been regularly and consistently demonstrated by its representation in the visual media through the years as an archetypal bach community. In the middle decades of the 20th century, the bay was an accessible subject for the 'Canterbury School' of regionalist painters. The most well-known of these paintings is Bill Sutton's *Untitled (Taylor's Mistake)* of the late 1940s. The bay has also been depicted by Francis Shurrock, Rosa Sawtell, Doris Lusk, and Cecil and Elizabeth Kelly. Since the 1980s, nostalgia for and celebration of the traditional bach way of life has seen Taylor's Mistake baches frequently depicted in picture books and other popular media. This exposure has contributed to Taylor's Mistake becoming one of New Zealand's better-known and most iconic beach settlements.

ARCHITECTURAL AND AESTHETIC SIGNIFICANCE

Architectural and aesthetic values that demonstrate or are associated with: a particular style, period or designer, design values, form, scale, colour, texture and material of the place.

Bach 69 has architectural and aesthetic significance as an example of what is now considered a distinctive sub-group of New Zealand architecture, the vernacular dwellings commonly built (and often subsequently altered) to serve as baches in the middle years of the 20th century.

Such dwellings were usually owner built and designed without formal plans (or planning), constructed of locally-sourced, affordable or found materials, and often later altered and adapted to suit owners' needs as required. Bach design was usually individual and particular to the site, with design and style reflecting the notions, needs and means of their owners. Many of the first generation of baches were formed from shore-line caves. The remote location of many Taylor's Mistake baches - where most materials had to be carried or boated in - encouraged the use of lightweight materials and whatever was immediately to hand. By mid-century, baches were usually more substantial structures, built of commercial materials such as fibre cement cladding (Fibrolite/Polite), possibly as a result of changing building code requirements. Although they were more akin to permanent dwellings, these baches resembled their predecessors in so far as they were usually designed by their owners and generally did not follow typical domestic models. Built for an informal lifestyle, they tended to adhere more to a mid-century art deco or modernist-derived aesthetic, with features such as mono-pitch roofs, open-plan layouts and indoor-outdoor flow.

Bach 69 reflects the typology and characteristics of the 'kiwi' bach in its simple forms, materials and the way in which its construction made use of a pre-existing feature. Built in 1957, with its mono-pitch roof, fibre-cement cladding and large timber framed windows, Bach 69 is an exemplar of the mid-century bach. It is (unusually) located on top of a pillbox/gun emplacement constructed in c1941 from concrete but camouflaged with local stone. This retains the gun openings. The deck of the bach is jettied out over the rocks from the pillbox, supported on metal poles.

TECHNOLOGICAL AND CRAFTSMANSHIP SIGNIFICANCE

Technological and craftsmanship values that demonstrate or are associated with: the nature and use of materials, finishes and/or technological or constructional methods which were innovative, or of notable quality for the period.

Bach 69 has technological and craftsmanship significance as a vernacular building, reflecting the building techniques and materials of the mid-20th century, and also illustrating military concrete pillbox construction. The construction of the bach in 1957 followed the trend of building more permanent baches. The use of bought (rather than found) materials may have been a response to building regulations, as noted above, and the availability of materials such as fibrolite, which could be easily flat packed and carted, enabled construction at less cost than more traditional materials. Fibrolite fell out of favour in the 1970s and 80s¹ and is not found in later alterations to baches. The building is constructed on the previously built pillbox, and then jettied over the rocks supported on metal poles, demonstrating clever use of the existing structure and some ingenuity on the part of the builders.

CONTEXTUAL SIGNIFICANCE

Contextual values that demonstrate or are associated with: a relationship to the environment (constructed and natural), a landscape, setting, group, precinct or streetscape; a degree of consistency in terms of type, scale, form, materials, texture, colour, style and/or detail; recognised landmarks and landscape which are recognised and contribute to the unique identity of the environment.

Bach 69 has contextual significance on its site and within its setting. The contextual significance of the bach is derived partly from its location in the coastal landscape, and partly from its association with the other small scale and informally-built baches of Taylor's Mistake.

The baches at Hobson's Bay are a mix of single and two stories, clad in Fibrolite, with some weatherboard. There are some two storied baches which are narrow and boxy in form. Conversely the single storied baches are strongly horizontal in form which is commonly

¹ <https://teara.govt.nz/en/ephemera/38658/fibrolite>

emphasized by the balustraded decks along the frontage. Baches are set high into the rocky cliff faces or are perching on rocky outcrops. Some are set within the bush and scrub of the cliff. Their locations in the landscape often require steps up, retaining walls and thin support poles for the baches. Roof forms vary from gables to flat or mono pitched. Paint colours are generally neutral and light. Roofs are clad in corrugated iron, and windows are largely timber framed. The baches are spread out across the bay, separated by areas of scrubby cliff face.

The bach stands alone on a terrace on the steep hillside above the cliffs at the far western end of Hobson Bay. It relates strongly to the group of baches in Hobson's Bay and in particular to the other two storey baches nearby in terms of its design, form, scale, materials, texture and location and is a key contributor to the group. The pillbox is a key part of the setting of this bach as it is a reflection of the construction of the bach directly within the cliffscape. The dark green and red colours of this bach are stronger than the colours of the group of baches in Hobson's Bay.

The group of baches of Taylor's Mistake are a well-known landmark in Christchurch as they are a prominent feature of the bay and its popular coastal walk.

ARCHAEOLOGICAL AND SCIENTIFIC SIGNIFICANCE

Archaeological or scientific values that demonstrate or are associated with: the potential to provide information through physical or scientific evidence and understanding about social historical, cultural, spiritual, technological or other values of past events, activities, structures or people.

Bach 69 and its setting are of archaeological significance because they have the potential to provide archaeological evidence relating to past building construction methods and materials, and human activity on the site. This includes defence activities – the pillbox construction by the army. There was no known Māori settlement at Taylor's Mistake (Te Onepoto/short beach), but it was likely to have been employed in mahinga kai (food gathering). Baches were developed in the area from the turn of the 20th century.

ASSESSMENT STATEMENT

Bach 69 and its setting are of overall heritage significance to Christchurch, including Banks Peninsula. The bach has historical and social significance as a reflection of aspects of patterns of recreation and leisure in mid-20th century New Zealand; for its association with the TMSLC and publican Alf Barrett; as part of the Taylor's Mistake bach community – well-known in Christchurch and for its connection with military defence history. Bach 69 has cultural significance for the manner in which it signifies the informal do-it-yourself bach way of life of the early and mid-20th century, for its longevity of ownership within one family, for its association with early surf lifesaving and for the public esteem in which the area is held as evidenced by its frequent artistic representation. The building has architectural and aesthetic significance as a representative example of what is now considered a distinctive sub-group of New Zealand architecture, the small vernacular dwellings commonly built to serve as baches in the middle years of the 20th century, individual and particular to their sites and altered over time. It has technological significance as a vernacular building, reflecting the building techniques and materials of the mid-20th century and making use of the existing pill box structure that it is located on top of. Bach 69 has contextual significance on its site and within its setting, for its relationship to the landscape, cliffside and bay, and for its shared physical characteristics with the group of baches in Hobson's Bay, of which it is a key contributor. The bach and its setting are of archaeological significance because they have the potential to provide archaeological evidence relating to past building construction methods and materials, and human activity on the site.

REFERENCES:

R. Cairns; B. Turpin *Guardians of the Mistake: the history of the Taylor's Mistake Surf Life Saving Club 1916-1991*

P. Carpinter; K. Tutty *Taylor's Mistake - Over the Hill for 100 Years: a history of Taylor's Mistake Surf Life Saving Club 1916-2016*

B. Mortlock, *Life History Report. An appendix to The Taylors Mistake Bach Holders Community Assessment*, 1998

Pers. comm. Janet Abbott

Births, Deaths and Marriages website

Papers Past website

Te Ara Encyclopaedia of New Zealand <https://teara.govt.nz>

Wises Street Directories (accessed via Ancestry website)

Taylor's Mistake Association files (privately held)

Sumner Borough Council Minute Books (CCC Archives; formerly held at Archives New Zealand). Digest of references to Taylor's Mistake compiled by O. Snoep, 1993 (CCC files).

Paul Thompson *The Bach* (1985)

Kevyn Male's *Good Old Kiwi Baches* (2001)

REPORT DATED: 14 OCTOBER 2021

PLEASE NOTE THIS ASSESSMENT IS BASED ON INFORMATION AVAILABLE AT THE TIME OF WRITING. DUE TO THE ONGOING NATURE OF HERITAGE RESEARCH, FUTURE REASSESSMENT OF THIS HERITAGE ITEM MAY BE NECESSARY TO REFLECT ANY CHANGES IN KNOWLEDGE AND UNDERSTANDING OF ITS HERITAGE SIGNIFICANCE.

PLEASE USE IN CONJUNCTION WITH THE CHRISTCHURCH CITY COUNCIL HERITAGE FILES..

**CHRISTCHURCH DISTRICT PLAN – SCHEDULED HERITAGE PLACE
HERITAGE ASSESSMENT – STATEMENT OF SIGNIFICANCE
HERITAGE ITEM NUMBER 1453
*BACH AND SETTING - 70 TAYLOR’S MISTAKE BAY,
SCARBOROUGH***



PHOTOGRAPH: G. WRIGHT, 2017

HISTORICAL AND SOCIAL SIGNIFICANCE

Historical and social values that demonstrate or are associated with: a particular person, group, organisation, institution, event, phase or activity; the continuity and/or change of a phase or activity; social, historical, traditional, economic, political or other patterns.

Bach 70 has historical and social significance as a reflection of aspects of patterns of recreation and leisure in early and mid-twentieth century New Zealand; for its connection to the eponymous Hobson family of Hobson's Bay, and as part of the Taylor's Mistake bach community – well-known in Christchurch.

Bach 70 is located high on the hillside at the far western end of Hobson's Bay, looking back over the bay's cliff-side baches. Research to date suggests that the bach was built by cabinet maker Ernest (Ernie) Hooker in the period around World War I. Born in England, Ernie came to New Zealand with his family in the late 1880s. Like many Taylor's Mistake bach owners, he belonged to the Linwood Rugby Club. In 1945 he sold his bach to David Scott and his wife Elizabeth. Elizabeth was the daughter of Thomas (Tom) Hobson, the eldest son in the large Linwood-based family of John and Susannah Hobson, who began holidaying together at Taylor's Mistake before the turn of the century and built *Whare Moki* (Bach 68) - the first of many family baches in Hobson's Bay - in c1907. David and Elizabeth had two children – Alison and David (known as Harley). Harley took over Bach 70 from his parents, retaining it for thirty years until 2009 when he sold it to the East family.

CULTURAL AND SPIRITUAL SIGNIFICANCE

Cultural and spiritual values that demonstrate or are associated with the distinctive characteristics of a way of life, philosophy, tradition, religion, or other belief, including: the symbolic or commemorative value of the place; significance to Tangata Whenua; and/or associations with an identifiable group and esteemed by this group for its cultural values.

Bach 70 has cultural significance for the manner in which it signifies the informal self-sufficient bach way of life of the early and mid-20th century, for its longevity of ownership within one family, and for the public esteem in which the area was held as evidenced by its frequent artistic representation. The bach way of life is held to represent values which are quintessentially 'kiwi' representing the New Zealand culture of 'do it yourself' and connecting with the natural environment.

The public esteem for the wider Taylor's Mistake area has been regularly and consistently demonstrated by its representation in the visual media through the years as an archetypal bach community. In the middle decades of the 20th century, the bay was an accessible subject for the 'Canterbury School' of regionalist painters. The most well-known of these paintings is Bill Sutton's *Untitled (Taylor's Mistake)* of the late 1940s. The bay has also been depicted by Francis Shurrock, Rosa Sawtell, Doris Lusk, and Cecil and Elizabeth Kelly. Since the 1980s, nostalgia for and celebration of the traditional bach way of life has seen Taylor's Mistake baches frequently depicted in picture books and other popular media. This exposure has contributed to Taylor's Mistake becoming one of New Zealand's better-known and most iconic beach settlements.

ARCHITECTURAL AND AESTHETIC SIGNIFICANCE

Architectural and aesthetic values that demonstrate or are associated with: a particular style, period or designer, design values, form, scale, colour, texture and material of the place.

Bach 70 has architectural and aesthetic significance as a representative example of what is now considered a distinctive sub-group of New Zealand architecture, the small vernacular dwellings commonly built to serve as baches in the early and middle years of the 20th century.

Such dwellings were usually owner built and designed without formal plans (or planning), constructed of locally-sourced, affordable or found materials, and often later altered and adapted to suit owners' needs as required. Bach design was usually individual and particular to the site, with design and style reflecting the notions, needs and means of their owners. Many of the first generation of baches were formed from shore-line caves. The remote location of many Taylor's Mistake baches - where most materials had to be carried or boated in - encouraged the use of lightweight materials and whatever was immediately to hand. By mid-century, baches were usually more substantial structures, built of commercial materials such as fibre cement cladding (Fibrolite/Polite), possibly as a result of changing building code requirements. Although they were more akin to permanent dwellings, these baches resembled their predecessors in so far as they were usually designed by their owners and generally did not follow typical domestic models. Built for an informal lifestyle, they tended to adhere more to a mid-century art deco or modernist-derived aesthetic, with features such as mono-pitch roofs, open-plan layouts and indoor-outdoor flow.

Bach 70 reflects the typology and characteristics of the 'kiwi' bach in its simple forms and materials. It began as a small gabled board and batten hut of one or two rooms. Modest additions have been made over the years. In the 1970s a small flat roofed extension was made to the south elevation, and later, a similarly-scaled bathroom extension to the north. The roof is corrugated iron and windows are a mix of timber framed and metal/aluminium. French doors open on to a deck which runs around the front and side of the bach, with wire balustrading. The bach remains in good condition and in use following the Canterbury earthquakes.

TECHNOLOGICAL AND CRAFTSMANSHIP SIGNIFICANCE

Technological and craftsmanship values that demonstrate or are associated with: the nature and use of materials, finishes and/or technological or constructional methods which were innovative, or of notable quality for the period.

Bach 70 has technological and craftsmanship significance as a vernacular building, reflecting the building techniques and materials of the early and mid-20th century. Timber construction of entire buildings using board and batten could be seen in the late 19th century, as well as the early 20th, generally using local timber. In addition, it was occasionally used as a decorative feature on bungalows and in the mid-20th century on architect-designed buildings.¹ Its use on bach 70 aligns with the use of board and batten at the turn of the 20th century as a more common vernacular product. Board and batten is also used in some of the historic baches on Rangitoto Island and Tongaporutu River.

CONTEXTUAL SIGNIFICANCE

Contextual values that demonstrate or are associated with: a relationship to the environment (constructed and natural), a landscape, setting, group, precinct or streetscape; a degree of consistency in terms of type, scale, form, materials, texture, colour, style and/or detail; recognised landmarks and landscape which are recognised and contribute to the unique identity of the environment.

Bach 70 has contextual significance on its site and within its setting. The contextual significance of the bach is derived partly from its location in the coastal landscape, and partly from its association with the other small scale and informally-built baches of Taylor's Mistake.

The baches at Hobson's Bay are a mix of single and two stories, clad in Fibrolite, with some weatherboard. There are some two storied baches which are narrow and boxy in form. Conversely the single storied baches are strongly horizontal in form which is commonly emphasized by the balustraded decks along the frontage. Baches are set high into the rocky cliff faces or are perching on rocky outcrops. Some are set within the bush and scrub of the cliff. Their locations in the landscape often require steps up, retaining walls and thin support poles for the baches. Roof forms vary from gables to flat or mono pitched. Paint colours are generally neutral and light. Roofs are clad in corrugated iron, and windows are largely timber framed. The baches are spread out across the bay, separated by areas of scrubby cliff face.

Bach 70 stands alone on a terrace on the steep hillside above the cliffs at the far western end of Hobson Bay. It relates strongly to the group of baches in Hobson's Bay in terms of its design, form, scale, materials, texture and location and is a key contributor to the group.

The group of baches of Taylor's Mistake are a well-known landmark in Christchurch as they are a prominent feature of the Bay which is a popular local destination for recreation activities.

ARCHAEOLOGICAL AND SCIENTIFIC SIGNIFICANCE

Archaeological or scientific values that demonstrate or are associated with: the potential to provide information through physical or scientific evidence and understanding about social historical, cultural, spiritual, technological or other values of past events, activities, structures or people.

Bach 70 and its setting are of archaeological significance because they have the potential to provide archaeological evidence relating to past building construction methods and materials, and human activity on the site. There was no known Māori settlement at Taylor's Mistake (Te Onepoto/short beach), but it was likely to have been employed in mahinga kai (food gathering). Baches were developed in the area from the turn of the 20th century.

ASSESSMENT STATEMENT

Bach 70 and its setting are of overall heritage significance to Christchurch, including Banks Peninsula. The bach has historical and social significance as a reflection of aspects of patterns of recreation and leisure in mid-20th century New Zealand; for its association with the eponymous Hobson family of Hobson's Bay; and as part of the Taylor's Mistake bach community – well-known in Christchurch. It has cultural significance for the manner in which it

¹ <https://www.renovate.org.nz/bungalow/walls-and-claddings/wall-cladding-original-details/>

signifies the informal do-it-yourself bach way of life of the early and mid-20th century, for its longevity of ownership within one family and for the public esteem in which the area is held as evidenced by its frequent artistic representation. The building has architectural and aesthetic significance as a representative example of the small vernacular dwellings commonly built to serve as baches in the early and middle years of the 20th century, individual and particular to their sites, and altered over time. The bach has technological significance as a vernacular building, reflecting the building techniques and materials of the early and mid-20th century. It has contextual significance on its site and within its setting, for its relationship to the landscape, cliffside and bay, and for its shared physical characteristics with the group of baches in Hobson's Bay, of which it is a key contributor. The bach and its setting are of archaeological significance because they have the potential to provide archaeological evidence relating to past building construction methods and materials, and human activity on the site.

REFERENCES:

R. Cairns; B. Turpin *Guardians of the Mistake: the history of the Taylor's Mistake Surf Life Saving Club 1916-1991*

P. Carpinter; K. Tutty *Taylor's Mistake - Over the Hill for 100 Years: a history of Taylor's Mistake Surf Life Saving Club 1916-2016*

B. Mortlock, *Life History Report. An appendix to The Taylors Mistake Bach Holders Community Assessment*, 1998

Pers. comm. Janet Abbott

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Papers Past website

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World War I Military Personnel Files (Archives New Zealand)

John Collinson Hobson and Descendants [unpublished family history, c1990]

Paul Thompson *The Bach* (1985)

Kevyn Male's *Good Old Kiwi Baches* (2001)

REPORT DATED: 14 OCTOBER 2021

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PLEASE USE IN CONJUNCTION WITH THE CHRISTCHURCH CITY COUNCIL HERITAGE FILES.

**CHRISTCHURCH DISTRICT PLAN – SCHEDULED HERITAGE PLACE
HERITAGE ASSESSMENT – STATEMENT OF SIGNIFICANCE
HERITAGE ITEM NUMBER 1405
FORMER DWELLING/STUDIO, GARDEN AND SETTING,
THE SUTTON HERITAGE HOUSE AND GARDEN -
20 TEMPLAR STREET, CHRISTCHURCH**



PHOTOGRAPH: A. OHS, 2017

HISTORICAL AND SOCIAL SIGNIFICANCE

Historical and social values that demonstrate or are associated with: a particular person, group, organisation, institution, event, phase or activity; the continuity and/or change of a phase or activity; social, historical, traditional, economic, political or other patterns.

This dwelling/ studio, garden and setting are of high historical and social significance for their association with William (Bill) Sutton, an important New Zealand artist and long term lecturer at the University of Canterbury. The house is a rare reminder of the residential environment in the vicinity of the Avon River that was largely demolished following the large scale damage to land and property caused by the Canterbury Earthquakes.

The house at 20 Templar Street was Sutton's home and workplace for 37 years. He produced many of his renowned works there. Sutton was born in Christchurch on 1 March 1917 and was educated at Sydenham School, Christchurch Boy's High School, Canterbury University College School of Art (1934 – 1938) and the Anglo-French Art Centre London (1947-48). He was a lecturer at the School of Fine Arts at the University of Canterbury for 30 years (1949 – 79); a council member (1949 – 60) and vice-president (1965-67) of the Canterbury Society of Arts; a member of the

Visual Arts Advisory Council and QEII Arts Council and a trustee of the National Gallery National Museum and War Memorial. William Sutton received many major art awards and fellowships including: Canterbury College Medal (1937), QEII Arts Council Fellowship (1973), Companion of the British Empire (1980) and Governor General's Award in 1984. He died on 26 January 2000.

Sutton was one of Canterbury's most important 20th century landscape painters and today his works are in public and private collections throughout New Zealand and overseas. Many of these works including dozens of portraits of some of the most eminent figures of the day in law, education, medicine and many other professions were painted in his Templar Street studio where he lived and worked between 1963 and his death in 2000.

The purpose-built dwelling incorporating a studio enabled Sutton to paint and store his artworks, accept formal portrait commissions in much greater numbers and to explore other media, particularly printing. Sutton had an Albion press which he used to set up what he called Templar Press.

The interior of the house and the garden are of high historical and social significance because they evidence Sutton's way of life and work and are able to convey with immediacy the way of life of one of New Zealand's most important artists and thereby provide valuable context and insight into his work.

Following Sutton's death in January 2000 the property was briefly owned by the William A. Sutton Trust before being sold to former Christchurch Art Gallery Director, Neil Roberts. One of the conditions of that sale was that a covenant be placed on the title, which meant that the house and surrounding garden are to remain unaltered in perpetuity. This was entered into with the Christchurch City Council in August 2002.

The land sustained some liquefaction as a result of the February 2011 earthquake and some lateral movement occurred to the house. The owner vacated the property after essential services to the area were cut off. The Canterbury Regional Earthquake Authority (CERA) announced on 23 March 2012 that 20 Templar Street was to become part of the area of land designated as Red Zone, and owned by the Government.

Ownership transferred to Land Information New Zealand (LINZ), who undertook repairs and strengthening works in 2019/2020. On completion of the works, LINZ transferred ownership to the Christchurch City Council. The Sutton Heritage House and Garden Trust, formed in 2019, plan to manage the property as a house museum and cultural destination. An Artist in Residence programme has been established.

CULTURAL AND SPIRITUAL SIGNIFICANCE

Cultural and spiritual values that demonstrate or are associated with the distinctive characteristics of a way of life, philosophy, tradition, religion, or other belief, including: the symbolic or commemorative value of the place; significance to Tangata Whenua; and/or associations with an identifiable group and esteemed by this group for its cultural values.

The property is of high cultural significance for its association with a notable New Zealand painter, who made a significant contribution to the cultural life of New Zealand, and his way of life.

The building holds a similar cultural significance as other important artist residences in New Zealand such as the Rita Angus house in Wellington and the Colin McCahon house in Auckland. The Dame Ngaio Marsh house is a comparative local example.

There is commemorative value in the house which provides a connection with and understanding of the artist and his works.

The house with its studio and garden demonstrate Sutton's way of life as an artist which was to work and live from the same location and be closely connected with natural features. He produced many of his most notable works at the property, and hosted social gatherings there.

Following the Canterbury Earthquakes, and the designation of the land on which the property sits within the Red Zone, there was public concern expressed for its future. Some City Councillors expressed a desire to save the dwelling and studio in 2012 (*The Press*, 'Councillors want to save artist's former home', Lois Cairns, 4.9.2012). A Trust – the Sutton Heritage House and Garden Charitable Trust - was formed in 2019 to secure its ongoing use, and public accessibility. It is important as heritage which survived large scale post-earthquake demolitions in the city.

ARCHITECTURAL AND AESTHETIC SIGNIFICANCE

Architectural and aesthetic values that demonstrate or are associated with: a particular style, period or designer, design values, form, scale, colour, texture and material of the place.

The dwelling/studio and garden, are of high architectural and aesthetic significance as they were purpose-built for Sutton, to a design by fellow artist and sculptor Tom Taylor in 1961. The building relates stylistically to local interpretations of Modernist architecture, and the studio is the main focus of the building.

The house retains a very high degree of originality, and clearly evidences its built purpose and use as an artist's residence and studio. Taylor, a lecturer in sculpture at the University of Canterbury's School of Fine Arts from 1961-90 had studied architecture for two years and came up with a design that successfully incorporated a compact two-storey residence and studio. Taylor also designed several other houses in Christchurch.

The house has a single storeyed studio and glasshouse at the western end, and a two storied living areas to the east. The roof is mono-pitched. Cladding is vertical tongue and groove timber. The windows are timber framed. A garage is incorporated, with a garage door facing the street. A balcony with timber balustrade overlooks the garden on the north façade.

Conservation and repair works were undertaken in 2019/20. This included replacement of rotten timbers, repair of fibrous plaster wall and ceiling linings, installation of structural bracing (requiring replacement of some wall claddings and linings), the removal of the damaged section of block wall to the street boundary with a view to reconstructing it, and removal of the Paulownia tree adjacent to it. Disabled access was added from the garage to the living room with a revised garage door to replace the later galvanised steel garage door and an enlarged internal door. Other changes include a new fence along the original north boundary line, two gates in the fence at the north-east corner of the property and bricks laid in the previous location of a vegetable garden.

The dwelling features a terrace along the front, and a patio. The house was designed to maximise light - a high bank of windows runs along the back wall of the studio space, which was also used for living and entertaining. The house combines elements of the traditional colonial cottage (pitched roof, veranda) with modernist elements (boxy rear section). External timber cladding is vertical; windows are timber framed.

The whole interior is considered to be part of the heritage item because of the large extent of heritage fabric that remains throughout. The interior layout features a small private upstairs space and large studio/living room downstairs, which comprises a third of the floor plan. Built in bookcases, and the original kitchen joinery remains, with sliding cupboard doors, to the original design by Taylor. The form, spaces, materials, structural elements, ceilings, walls, joinery, doors, fittings, hardware, stairs, balustrades and steps, built-in furniture, finishes, flooring and design elements are highly intact. The balustrade in the dining room is made of New Zealand beech. The log burner and tiled hearth were later additions made by Sutton and are therefore also associated with the artist. A decorative plaster cast (from the former Arts School collection) is built into the south wall of the studio. The shelving wall incorporates a Fijian tapa cloth backing, purchased by Sutton in the 1950s. Sutton's easel and portrait chair remain in the house.

Sutton developed and planted the garden. The garden is of high architectural and aesthetic significance for its plantings, brick paths, brick terrace, walls, gates, established trees and layout. Plantings include cabbage trees, camellia, lancewood, nerium, white rata, rhododendron, callistemon, grapefruit, kowhai, paulownia, lemon, feijoa, aralia, karaka, winter sweet, quince, aucuba, aralia, prunus, embothrium, and chaenomeles. The garden features areas of distinct character as a result of the plant palette and use.

TECHNOLOGICAL AND CRAFTSMANSHIP SIGNIFICANCE

Technological and craftsmanship values that demonstrate or are associated with: the nature and use of materials, finishes and/or technological or constructional methods which were innovative, or of notable quality for the period.

The dwelling and studio are of significance as the methods and materials used reflect the practices of the period, with a particular attention to the quality of materials and detailing on the interior and exterior.

The wall to the street is of unpainted concrete block, and the garden features a brick courtyard and paths as well as concrete paths. The exterior is characterised by the use of vertical timber cladding. Stained and painted timber also features on the interior for built in furniture, exposed beams, doors and trims. Tapa cloth and a decorative plaster work feature in the studio.

CONTEXTUAL SIGNIFICANCE

Contextual values that demonstrate or are associated with: a relationship to the environment (constructed and natural), a landscape, setting, group, precinct or streetscape; a degree of consistency in terms of type, scale, form, materials, texture, colour, style and/or detail; recognised landmarks and landscape which are recognised and contribute to the unique identity of the environment.

The dwelling/studio, garden and setting have high contextual significance for the way the house is placed in its original garden setting, and for the design of the garden. The garden, front gates, street wall and plaque are ancillary features that have significance in the setting of the house. In landscaping the property Sutton incorporated a path and courtyard paved with bricks recycled from the demolition of a local hotel. One of Sutton's interests was his garden which he developed and planted soon after he began living at Templar Street. He established many trees and exotic plants. A number of his more substantial plantings have matured and remain today. Trees reach towards the upper storey balcony and there is an integration between the house and garden. The wider context of the dwelling within a residential

area has significantly changed since the large-scale demolitions that followed the Canterbury Earthquakes.

When the title was transferred to the Council the original section had been extended with the addition of two adjacent empty sections to the north to allow for the development of the property as a house museum. The setting for the dwelling/studio consists of the original property, which includes Sutton's established garden, as well as the adjacent properties, formally 22 and 26 Harvey Terrace, that are now integrated into the future of the site.

ARCHAEOLOGICAL AND SCIENTIFIC SIGNIFICANCE

Archaeological or scientific values that demonstrate or are associated with: the potential to provide information through physical or scientific evidence and understanding about social historical, cultural, spiritual, technological or other values of past events, activities, structures or people.

The property is of archaeological significance as there is early documented activity on the site. The property is located close to the Ōtākaro (Avon River), which was an important part of the interconnected network of traditional travel routes for Ngāi Tahu, and which supported numerous kāinga mahinga kai (food-gathering places), where birds, fish and plants were harvested and gathered¹.

The property at 20 Templar or Templer Street as it was known until 1917 has had only four owners since it was subdivided from rural section 33 in 1894. The first purchaser of the site was Christchurch soda water manufacturer Ernest William Griffin and his wife Sarah Griffin. The Griffins lived at this address for several years before renting the property. In 1928 Mrs Griffin sold 20 Templar Street to Christchurch electrical engineer Colin Curtis who also rented the property out. Curtis sold it to R.C Millar (builder) who later sold it, as a vacant section, to Sutton. The adjacent properties that now form part of the setting both had the original villas at the time of the Canterbury earthquakes; both are now demolished.

ASSESSMENT STATEMENT

William Sutton's dwelling/studio, garden and setting, including the whole interior, are of overall high heritage significance to the Christchurch District, and also have heritage significance nationally, considering Sutton's standing as a New Zealand artist.

The dwelling/studio, garden and setting are of high historical and social significance for their long term connection with Sutton and his work. They are of high cultural significance as the residence and workspace of an important New Zealand artist, illustrating his way of life. The dwelling/studio, garden and setting are of high architectural and aesthetic significance for their mid-century architectural design by Tom Taylor and are of high contextual significance for the integration of the house with its garden. The dwelling is of technological and craftsmanship significance for its use of standard methods and materials of the time with particular attention to the quality of materials and detailing. The property is of archaeological significance for the early history of activity on the site, and potential to provide evidence of this.

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REPORT DATED: 5 OCTOBER 2021

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**CHRISTCHURCH DISTRICT PLAN – SCHEDULED HERITAGE PLACE
HERITAGE ASSESSMENT – STATEMENT OF SIGNIFICANCE
HERITAGE ITEM NUMBER 1455
*FORMER WOODHAM PARK CARETAKER’S DWELLING
AND SETTING -
157 WOODHAM ROAD, CHRISTCHURCH***



PHOTOGRAPH: A OHS, 12 MAY 2022

HISTORICAL AND SOCIAL SIGNIFICANCE

Historical and social values that demonstrate or are associated with: a particular person, group, organisation, institution, event, phase or activity; the continuity and/or change of a phase or activity; social, historical, traditional, economic, political or other patterns.

The former Woodham Park Caretaker's Dwelling and setting are of historical and social significance for their association with Woodham homestead and the Palairet, Shands, Whitcombe and Ivimey families and in particular with its later use as a Council owned public reserve - Woodham Park. It is also associated with the first caretaker Mr A.G Neave, and subsequent caretakers and their families who lived in the house.

The property was originally part of Rural Section 125. The section of land which became Woodham Park and the site of the caretaker's house was owned by John Gwalter Palairet from the 1870s, and was passed on to family following his death in 1878. John lived there with wife Jane and their children - sons - Gwalter, Colthurst and Rowland and daughter Ellen Susanne, who married barrister Henry Slater.

Research to date does not provide a date for the construction of this early house, however it may have been built in the 1870s for Palairet. A house 'of five good rooms, with stable and four acres grass' – possibly Woodham - was advertised for rent in March 1893 by R Palairet, one of John's sons.

The land has a history of subdivision and changes in ownership. In 1900 and 1909 George Hawkes Whitcombe, of the printing company Whitcombe and Tombs Ltd, purchased some of the land. Whitcombe died in 1917. Following Whitcombe's death the house and

approximately 4 acres were on-sold to Robert Shand, a brewer and his wife Lucia. The Shands lived at 'Woodham' until 1936 when the property was advertised for sale. At this time it was described as a substantially built two-storeyed residence with garaging for two cars, loose-boxes (accommodation for horses) and a loft. The property was 3 acres, 1 rood and 5 perches when Frederick Elder Ivimey purchased it from Lucia Shand in 1937. Ivimey was a Captain in the South Island Regiment. He lived at 'Woodham' until 1939 before being recalled for War service. In December of that year he offered the property to the Council for a children's park noting that much of his motivation to do so was to prevent the landscaped grounds of 'Woodham' from being sub-divided.

Having inspected the grounds and house, the Parks Committee agreed that it would be an ideal children's playground and neighbourhood park by virtue of its location, size and maturity of planting and it was formally purchased in October 1940 for £2280. The Park was officially opened by the Mayor and Chairman of the Parks Committee in November 1942.

Council decided to demolish the Woodham homestead and utilise any salvageable materials to construct the caretaker's house and a park pavilion. Demolition of the former residence in July 1941 revealed that exterior timbers were in poor condition and not as much was able to be able to be reused as planned. The City Engineer presented a sketch plan of the house to the Chairman and Members of the Abattoir and Reserves committee on 4 August 1941. The Caretaker's House was under construction in November 1941. Painting, papering and installation of electric light fittings were completed and the house was ready for occupation by February 1942.

There was a Council policy at the time to acquire, wherever possible, a large property in each congested district in the city and convert it to a park and open space for the benefit of the residents (The Press, 8 April 1946, pg 2)

In 1941 Council's activities were restricted to routine maintenance works due to war work. The remodelling and improvements at Woodham Park along with the caretakers house were noted as some of the few new activities in the City by Mayor E.H. Andrews in his review of December 1941 (The Press, 31 December 1941, Pg 9).

Mr A.G Neave was appointed as the first caretaker in Feb 1942. He was 34 years old, married with three children, employed for some years with the Reserves Department (under schemes 5 and 13 –possibly related to Depression era employment relief) and was a resident of the area. His son William Reece Neave was killed on active service in the Air Force (he was a Sergeant Air Gunner) in July 1944 (Ashburton Guardian, 6 July 1944, Pg 4). The Christchurch City Council expressed sympathy for Mr Neave at a meeting on 19 July 1944 (The Press, 20 June 1944, Pg 4). Neave was still the caretaker in 1959 when he won a section of land in a raffle related to Town Hall fundraising. He noted at the time that he expected to retire in four years. Neave was a life member of the North Linwood-Dallington Burgesses' Association (The Press, 26 December 1959, Pg 4).

Mr K.L Chestney is noted as being the caretaker in 1974. The caretaker role included arranging to accommodate the many events in the park such as the children's Christmas Party of the Chch Deaf Club Inc. in 1974.

The house had a resident caretaker up until 1996 and was subsequently a Parks staff residential tenancy until 2009. The house has been vacant since 2009. Only in special circumstances are Parks staff required to live on site nowadays.

In 2022 Parks Staff recommended to the Linwood-Heathcote-Central Community Board that the buildings be demolished, and the vacant land be landscaped to make the park more visible from the street frontage for safety and public awareness of the facility, and also to plant the area. Demolition was opposed by heritage interest groups, which also suggested that the building should have heritage status.

CULTURAL AND SPIRITUAL SIGNIFICANCE

Cultural and spiritual values that demonstrate or are associated with the distinctive characteristics of a way of life, philosophy, tradition, religion, or other belief, including: the symbolic or commemorative value of the place; significance to Tangata Whenua; and/or associations with an identifiable group and esteemed by this group for its cultural values.

The former Woodham Park Caretaker's Dwelling and setting are of cultural significance as they illustrate the way of life of a park caretaker and their family from the 1940s, as well as the practice in this period of sextons and park caretakers living on the site that they serviced. The late 20th century change in use of the dwelling being rented out demonstrates changing attitudes to working and living arrangements with people more commonly preferring to live separately from their place of work. Heritage interest groups expressed opposition to the possibility of Council demolition of the house in early 2022.

The park and provision for associated on site caretaker role reflects the importance of public recreation to the people of Christchurch. This was a period in town planning theory, which prioritised development of play facilities for children as well as responding to identified physical welfare and recreation needs in line with the 1937 physical Welfare and Recreation Act.

The establishment of the park reflects a phase in town planning when there was a move towards providing for adequate numbers of recreation or neighbourhood parks in residential areas. It also reflects the common occurrence in Christchurch whereby the Council purchased large homesteads with substantial grounds for recreation purposes. This typically occurred once the properties passed out of family ownership because the property extended beyond most modern families' needs. Other examples include Avebury House, Abberley Park (part of the homestead remains onsite) and Elmwood Park.

The property is located within the wider cultural landscape of the Ōtākaro - Avon River which was an important part of the interconnected network of traditional Ngāi Tahu travel routes, particularly as an access route through the swampy marshlands of Christchurch. The mouth of the Ōtākaro was a permanent mahinga kai, and the river supported numerous kāinga mahinga kai (food-gathering places). (Kā Huru Manu).

ARCHITECTURAL AND AESTHETIC SIGNIFICANCE

Architectural and aesthetic values that demonstrate or are associated with: a particular style, period or designer, design values, form, scale, colour, texture and material of the place.

The former Woodham Park Caretaker's Dwelling and setting are of architectural and aesthetic significance for their design and materials, some of which were salvaged from the earlier house on the site. It is noted in Council records that windows and doors from the Woodham homestead were reused in the Caretakers cottage.

The house retains its heritage fabric to a high degree. The layout of the house remains intact. The front door faces Woodham Road and is accessed through a simply decorated porch. A high timber dado in dark shellac finish features in the hallway. The central hallway includes a linen cupboard and telephone shelf, both in dark finished timber. The master bedroom, second bedroom, toilet, bathroom and lounge are accessed from this hallway. The lounge features timber panelling, and a tiled fireplace. Window sills and surrounds, along with the doors and architraves are all in a dark finished timber – probably shellac. Original light switches remain throughout including Bakelite/early plastic switch plates. Original kitchen cupboards remain, and a small inbuilt metal food safe remains.

The house features a variety of fenestration – possibly due to some of it having been salvaged from the demolished Woodham homestead. This includes a large, fixed three paned window and multi-paned casement windows either side of a large central single paned window in the lounge. Two leadlight windows are located in the sunroom, which is entered through French doors from the open plan dining and kitchen area. The kitchen area features a multi-paned window within an extended bay. The bathroom includes an original built in mirrored cabinet.

The wash house is within the house, but accessed through a separate external door. This contains the original concrete double tub, timber wall linings and shelving and cupboards. The house has a concrete ring foundation, with timber floor. It would appear that a salvaged door and sash windows have been used in the garden shed which is in a dilapidated state.

The house in its planning illustrates modern trends in architecture with its large windows and unframed glazing, and open plan kitchen and dining nook. The house is oriented towards the sun and includes a sunroom on the north corner. In this respect it has similarities with the Engineer's House at Halswell Quarry, designed by Evart Somers, acting City Engineer and designed in 1939.

Although it is noted that slates from the previous homestead were used for roofing, the Caretakers residence is now roofed in corrugated iron.

The whole interior contributes to the significance of the heritage item because of its form and materials, and the large extent of heritage fabric that remains throughout. Interior features include the layout and spaces, structure and linings, fixtures, hardware, materials and finishes. These are highly intact and reflect the period in which the house was constructed, and its history of residential use.

TECHNOLOGICAL AND CRAFTSMANSHIP SIGNIFICANCE

Technological and craftsmanship values that demonstrate or are associated with: the nature and use of materials, finishes and/or technological or constructional methods which were innovative, or of notable quality for the period.

The former Caretakers Dwelling and setting are of technological and craftsmanship for its construction, materials and finishes, which reflect the standards, technology and skills of the period in which it was built. The house is of timber weatherboard construction, and features timber panelling which has a shellac finish and leadlight windows, as well as original joinery and hardware. The setting features a stone wall, timber gate and stone edging that demonstrates techniques and craftsmanship skills of the period.

CONTEXTUAL SIGNIFICANCE

Contextual values that demonstrate or are associated with: a relationship to the environment (constructed and natural), a landscape, setting, group, precinct or streetscape; a degree of consistency in terms of type, scale, form, materials, texture, colour, style and/or detail; recognised landmarks and landscape which are recognised and contribute to the unique identity of the environment.

The former Caretakers Dwelling and setting are of high contextual significance for their location adjacent to Woodham Park, for the relationship of the house to the garden and for the landscaping design of the garden. The setting consists of the immediate area around the house, which is fenced off from the park in 2022, but which is not located on a separate land parcel to the park.

The house is situated to the east of the Woodham Road entrance to Woodham Park. The house relates to the park in terms of the design of the wall and gate at its frontage. The house is similar in materials, scale, form, age and design to other houses in Woodham Road.

The frontage of the property features a rubble basalt wall with crenellations and a set of original timber gates which were of the same style as gates which originally featured at the park entrance next door. The garden contains established trees and shrubs, including rhododendron, fuschia, buxus, cherry blossom, cabbage tree, and a golden totara. The driveway and garden are laid out with Halswell quarry stone edging.

ARCHAEOLOGICAL AND SCIENTIFIC SIGNIFICANCE

Archaeological or scientific values that demonstrate or are associated with: the potential to provide information through physical or scientific evidence and understanding about social

historical, cultural, spiritual, technological or other values of past events, activities, structures or people.

The former Caretakers Dwelling and setting are of archaeological significance because of the potential to provide evidence of human activity, including that prior to 1900. The property is located within the wider cultural landscape activity by Ngāi Tahu for travel and mahinga kai. There is a history of European occupation, farming and planting of the site since at least the 1870s.

SUMMARY ASSESSMENT

The former Woodham Park Caretakers Dwelling, including the whole of the interior, and setting is of overall significance to the Christchurch district including Banks Peninsula.

The former Woodham Park Caretaker's Dwelling and setting are of historical and social significance for their association with Woodham homestead and its later use as the home of caretakers for the adjacent Council owned public reserve - Woodham Park. The former Woodham Park Caretaker's Dwelling and setting are of cultural significance as they illustrate the way of life of a park caretaker and their family from the 1940s, as well as the practice in this period of caretakers living on the site that they serviced, and the changes in this over time. The property is located within the wider cultural landscape of the Ōtākaro (Avon River) which was an important part of the interconnected network of traditional Ngāi Tahu travel routes and which supported numerous kāinga mahinga kai (food-gathering places). The dwelling and setting are of architectural and aesthetic significance as a 1940s dwelling which has retained a high degree of integrity in terms of its original layout, materials, finishes and its garden setting. The former Caretakers Dwelling and setting are of technological and craftsmanship for its construction, materials and finishes, which reflect the standards, technology and skills of the period in which it was built. The former Caretakers Dwelling and setting are of high contextual significance for their location adjacent to Woodham Park, for the relationship of the house to the garden and for the landscaping design of the garden. The former Caretakers Dwelling and setting are of archaeological significance because of the potential to provide evidence of Māori and European activity, including that prior to 1900.

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CH377 WOODHAM PARK 1974

KA HURU MANU

REPORT DATED: JUNE 2022

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Independent Hearings Panel

Christchurch Replacement District Plan

Te paepae motuhake o te mahere whakahou a rohe o Ōtautahi

IN THE MATTER OF section 71 of the Canterbury Earthquake Recovery Act 2011 and the Canterbury Earthquake (Christchurch Replacement District Plan) Order 2014

AND

IN THE MATTER OF proposals notified for incorporation into a Christchurch Replacement District Plan

Date of hearing: 4 and 5 July 2016

Date of decision: 6 September 2016

Hearing Panel: Sir John Hansen (Chair), Environment Judge Hassan, Ms Jane Huria, Ms Sarah Dawson, Dr Phil Mitchell

DECISION 41

Chapter 14: Additional Residential Medium Density Areas for Linwood (Eastgate), Hornby and Papanui (Northlands)

Outcomes: Proposals changed as per Schedule 1

COUNSEL APPEARANCES

Mr J Winchester and Ms S Scott	Christchurch City Council
Mr C Carranceja	Crown
Ms L Semple and Ms H Marks	Housing New Zealand Corporation

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INTRODUCTION

[1] This decision ('decision') continues the series of decisions made by the Independent Hearings Panel ('Hearings Panel'/'Panel') concerning the formulation of a replacement district plan for Christchurch City (including Banks Peninsula) ('Replacement Plan'/'Plan'). It concerns a hearing on additional Residential Medium Density zoned areas in Linwood, Hornby and Papanui, which we directed be notified subsequent to the hearing of the Stage 1 Residential proposal, as part of Decision 10: Residential — Stage 1.¹

[2] In this decision, the phrase 'Notified Version' describes the version notified by the Christchurch City Council ('the Council'/'CCC') and to which, subsequent to consideration of submissions and conferencing, a number of changes were made. This was ultimately produced in closing by the CCC as a red-line version ('Revised Version'), including amended planning maps. The Revised Version included amendment to Rule 14.3.3.3 to reflect the Residential Medium Density Lower Height Limit Overlay (covering those zones that were previously Living 1 or Living 2 on the Christchurch City Plan) and the opportunity to increase maximum height from 8 metres to 11 metres in those areas covered by the overlay where a certain site size threshold, and distance from adjacent zones, is met.² The amendment to this rule is the same as was decided by us in Decision 31: Residential — Stage 1 supplementary maps, however it is proposed to also apply to the newly zoned areas.

[3] This decision follows our hearing of submissions and evidence. A list of submitters and expert witnesses who appeared at the hearing is included as Schedule 2 to this decision. Further background on the review process, pursuant to the Canterbury Earthquake (Christchurch Replacement District Plan) Order 2014 ('the OIC'/'the Order') is set out in the introduction to Decision 1, concerning Strategic Directions and Strategic Outcomes (and relevant definitions) ('Strategic Directions decision').³

¹ Members of the Hearings Panel who heard and determined this proposal are set out on the cover sheet.

² Closing submissions for the Council, 22 July 2016, Appendix 1.

³ Strategic directions and strategic outcomes (and relevant definitions), 26 February 2015.

Effect of decision and rights of appeal

[4] Our procedure and the rights of appeal are set out in our earlier decisions.⁴ We concur in those.

Identification of parts of existing district plans to be replaced

[5] The OIC requires that our decision also identifies the parts of the existing district plans that are to be replaced by the Chapter. In this respect, we replace all of the Planning Map zones in the existing Christchurch City Plan that are impacted by our decision.

Conflicts of interest

[6] We have posted notice of any potential conflicts of interest on the Independent Hearings Panel website.⁵ In the course of the hearing, it was identified on various occasions that submitters were known to members of the Panel either through previous business associations or through current or former personal associations. Those disclosures (and, on some matters, member recusals) were recorded in the transcript, which was again available daily on the Hearings Panel's website. No submitter raised any issue in relation to this.

⁴ Strategic Directions decision at [5]–[9].

⁵ The website address is www.chchplan.ihp.govt.nz.

REASONS

STATUTORY FRAMEWORK

[7] The OIC directs that we hold a hearing on submissions on a proposal and make a decision on that proposal.⁶ Our Stage 1 Residential decision set out the relevant statutory framework which also applies to this decision.⁷

[8] No issue was taken with any of the Higher Order Documents we must take into account and give effect to.

[9] At paragraph 100 of Decision 10: Residential — Stage 1, the Panel stated:

Importantly, however, Dr Fairgray and Mr Schellekens effectively agreed that RMD zoning is a low yielding and somewhat unpredictable means for delivering on intensification targets. In addition, as we have noted, the high order documents intend that most intensification should occur within Christchurch City. Given those factors, we find on the evidence that it is better to take a prudently generous, rather than a barely sufficient, approach to the provision of RMD zoning.

[10] Following on from that paragraph, the Panel determined that additional areas of potential for RMD should be notified by the CCC. These were areas that were shown on Exhibit 4 in the Stage 1 Residential hearing, which outlined the areas consulted on for possible RMD prior to notification of Stage 1.⁸ They also had to accord with the 800 metre walkable distance from each of the facilities identified in Policy 14.1.1.2(a) and in other respects accord with Policy 14.1.1.2.

⁶ OIC, cl 12(1).

⁷ Decision 10: Residential — Stage 1 at [9]–[10]. Our decision does not set out the text of various statutory provisions it refers to, as this would significantly lengthen it. However, the electronic version of our decision includes hyperlinks to the New Zealand Legislation website. By clicking the hyperlink, you will be taken to the section referred to on that website. The repeal of the CER Act by the Greater Christchurch Regeneration Act 2016 ('GCRA') does not materially alter that position. That is because s 147 of the GCRA provides that the OIC continues in force. Further, Schedule 1 of the GCRA (setting out transitional, savings and related provisions) specifies, in cl 10, that nothing in that Part affects or limits the application of the Interpretation Act 1999 which, in turn, provides that the OIC continues in force under the now-repealed CER Act (s 20) and preserves our related duties (s 17).

⁸ Stage 1 Residential hearing: Exhibit 4 — Residential Hearing Maps — Medium Density Areas dated 24 March 2015, produced 30 March 2015.

[11] Mr Blair gave us evidence in the Residential — Stage 1 hearing as to why areas were reduced by the Councillors.⁹ We asked counsel for CCC whether it would have been helpful if the CCC had advised us in earlier hearings that some of these areas which were removed from RMD were effectively ‘war memorials’, and why the Council had not adduced evidence to that effect. He informed us that he and his colleagues were not aware of the status, but the evidence would have been presented had it been known to them.¹⁰ Frankly, this was less than helpful and if we had been given more information at that stage at least the area of south Papanui would not have been included in our notification direction.

[12] The areas concerned are adjacent to the Papanui KAC, Eastgate (being the Linwood KAC) and Hornby KAC. Prior to notification, Housing New Zealand Corporation (‘HNZC’) (RMD126) initiated discussions with the CCC regarding the possible inclusion of a block immediately to the south-east of the Linwood KAC. Although the land did not meet the Exhibit 4 criteria (i.e. affected land owners had not been consulted about possible RMD zoning of the land prior to Stage 1 notification) the Panel invited the CCC to include this additional land in the new proposal. The request at that stage did not relate to additional RMD land HNZC is now pursuing in Hornby and Linwood.

[13] In that earlier decision we considered at length the Higher Order Documents. We adopt our earlier findings in that regard and do not repeat them here, except to the extent necessary below.

[14] We also note that in relation to a number of areas, agreement was reached between CCC, HNZC and the Crown. HNZC understood that agreement on the merits of rezoning was reached on the following matters:¹¹

3. Both Housing New Zealand and the Council are agreed that:
 - (a) Papanui North is suitable for RMD zoning;
 - (b) Linwood South is suitable for RMD zoning;
 - (c) Part of Linwood East is suitable for RMD zoning;

⁹ Transcript from Residential Stage 1 hearing, pages 221–224.

¹⁰ Transcript, page 6, lines 8–25.

¹¹ Opening submissions for HNZC at 3.

- (d) Hornby North-West (with the exception of Moffett Street) and parts of Hornby South East (Trevor Street, Amyes Road and Blankney Street) are suitable for RMD zoning;
- (e) The additional areas in North-West Hornby sought to be rezoned by Housing New Zealand (located immediately adjacent to the notified RMD areas along Amuri Street and Gilberthorpes Road) are suitable for rezoning;
- (f) The additional areas in South Linwood sought to be rezoned by Housing New Zealand (6 sites located to the immediate south of the Linwood South area located on Mackworth Street) are suitable for rezoning.

[15] We have found the Council's position on this to be slightly more complex as it relates to Hornby and we address this later in the decision.

[16] HNZN considered its remaining outstanding issues were as follows:¹²

- 4. Housing New Zealand and the Council are not in agreement with respect to the following matters:
 - (a) Housing New Zealand continues to support the RMD zoning as notified by Council in Papanui South-East and Papanui South-West. The Council's experts no longer support rezoning of these areas;
 - (b) Housing New Zealand continues to support the RMD zoning as notified by Council in Linwood North, Linwood East and Linwood West. The Council's experts no longer support rezoning of these areas (with the exception of part of Linwood East);
 - (c) Housing New Zealand opposes the Lower Height Limit Overlay;
 - (d) Housing New Zealand considers the provisions of the Natural Hazards chapter, as set out in Decision 8, are sufficient to ensure that development is appropriately controlled within Flood Management and Fixed Minimum Floor Level areas and as such Housing New Zealand does not support the removal of these areas from the notified RMD areas.

[17] The CCC's position was outlined in its opening as follows:¹³

The Council's position will release additional land for intensified residential development, which was the purpose of the Panel directing notification of further RMD, and will assist in better giving effect to the intensification targets in the CRPS and achieving Strategic Direction 3.3.4. It is however the Council's position that rezoning all of the notified and additional RMD land is not the most appropriate outcome under section 32 of the RMA, and that simply rezoning any land surrounding a KAC that

¹² Ibid at 4.

¹³ Opening submissions for the Council at 1.5.

meets the Policy 14.1.1.2 criteria, in order to take a ‘prudently generous’ approach, is not the correct approach to take under the RMA.

[18] The Council maintained its position in legal submissions that additional areas beyond those notified were potentially subject to natural justice issues. We address this issue later in our decision. However the Council did indicate, both in its evidence and maps filed in the Revised Version with closing submissions, areas identified as ‘accepted addition to RMD’. We understand that this was to assist the Panel, should it decide to agree that additional areas are within the scope of the proposal and supported by evidence.

[19] Where there have been matters of agreement as set out above at [14] (with the exception of Hornby, which we elaborate on further in our decision), we find they are well supported by the evidence of both CCC and HNZC. There was no expert evidence to contradict this rezoning and we rezone them accordingly.

[20] We deal with the disputed areas separately below.

Papanui South

[21] As we have noted, there was agreement relating to Papanui North and we have rezoned it RMD. Papanui South attracted a large number of submitters in opposition. Those submissions gave us a great deal of information that we had not previously received, particularly relating to the four war memorial streets in the area. The full history of these memorial streets, honouring the fallen of World War II, is set out in attachments to the evidence of Mrs Margaret Howley (RMD130) and can be found on our website.¹⁴

[22] Frankly, if we had known of this information it would have been a good reason not to require notification. That is because it at least indicates a potential matter of historic heritage to which the direction as to protection in s 6(f) of the RMA could well apply.

[23] We heard impassioned pleas from a number of submitters living in these areas and received a closing on behalf of a number of them from Mr Cleary, who did not appear on their behalf at the hearing. To a large part Mr Cleary’s closing is accepted by CCC. We are

¹⁴ All documentation received by the Independent Hearings Panel for the RMD hearing can be found at <http://www.chchplan.ihp.govt.nz/hearing/additional-residential-medium-density-areas-linwood-eastgate-hornby-papanui-northlands/>.

concerned that it seems to us in the main to attempt to re-litigate matters that have already been decided by the Panel when we dealt with character overlays as part of the Stage 2 Residential proposal. We are not aware that any of these submitters appeared or submitted on that proposal. The closing seems to be a submission that all these areas, or a large part of them, should attract a character overlay. In the two areas we are concerned with, only part of St James Avenue was covered by the character overlay. We have not had full evidence in this hearing. Despite the indications in the Council's evidence for Decision 10: Residential — Stage 1 as to the potential fit with RMD criteria, it did not provide any evidence such that would support that as an appropriate zoning choice on this occasion. Housing New Zealand's evidence concerning this area was highly generic, and did not disclose any particular need, on its part, for RMD zoning. Nor do we have a satisfactory s 32 analysis, nor do we have scope to revisit the whole issue of character overlay for this area. The CCC submits that, although the character exists, RS zoning is sufficient to protect it. We have already referred to the potential for s 6(f) to be relevant, and RMD rezoning could jeopardise that. In any case, in an evidential sense, we readily conclude that RMD rezoning is unwarranted and, therefore, inappropriate.

[24] There are four streets (St James, Windermere, Dormer and Perry) that are war memorials and could be compared to Memorial Avenue itself. There are plaques recognising this status, and St James Avenue hosts an annual Anzac Day Parade. As such, these streets have special significance and we are satisfied RMD zoning would denigrate that significance.

[25] There are two areas, one to the east and one to the west of the railway line. The two memorial streets, Windermere Road and St James Avenue in the western sector, effectively transect the entire area that was notified. For those east of the railway line the two streets, Dormer Street and Perry Street, transect a considerable part of the notified area.

[26] We are satisfied to attempt to apply RMD to the remaining areas of both south Papanui sectors would lead to “pepper-potting”, potentially poor streetscapes and a fractured urban setting.

[27] Mrs Howley in particular made an impassioned plea, as did others, as to the significant amenities of this area. Undoubtedly, there are amenities enjoyed by residents that are important to them. But we are not persuaded that they are unique. There are a number of other areas in Christchurch with similar urban form.

[28] However, because of the lack of evidential justification and the view we take of the importance of the four memorial streets included in these two sectors, we reaffirm the RS and RSDT zoning of these areas.

Linwood

[29] Ms Oliver gave planning evidence on behalf of the CCC. She had reached agreement, having considered Ms Styles's evidence for HNZC, that some of the notified RMD at Linwood be rezoned in addition to the additional RMD sites sought by HNZC. This was subject to a scope issue which we will return to.

[30] It was Ms Oliver's opinion that for the rest of Linwood Residential Suburban Density Transition (RSDT) zone provisions, together with the application of the enhanced development mechanism (EDM), will ensure housing intensification is achieved around the Eastgate KAC while still maintaining housing choice, particularly affordable family homes, to support the community.

[31] She was also of the view that further assessment of specific housing needs of the Linwood community was required before any further up-zoning to a greater density can be supported. In her Executive Summary she concluded at 3.5 by saying:¹⁵

I however support the [HNZC] proposal and therefore either a RMD zoning for these properties or the application of the Community Housing Development Mechanism is appropriate to facilitate the redevelopment of their properties.

[32] Central to the consideration of Ms Oliver and other evidence is Policy 14.1.1.2 which reads:

- a. Support establishment of new residential medium density zones to meet demand or housing in locations where the following amenities are available within 800 metres walkable distance of the area:
 - i. a bus route;
 - ii. a Key Activity Centre or larger suburban commercial centre;
 - iii. a park or public open space with an area of at least 4000m²; and
 - iv. a public full primary school, or a public primary or intermediate school.

¹⁵ Evidence in chief of Sarah-Jane Oliver on behalf of the Council at 3.5.

- b. Avoid establishment of new residential medium density development in:
 - i. high hazard areas;
 - ii. areas where the adverse environmental effects of land remediation outweigh the benefits; or
 - iii. areas that are not able to be efficiently serviced by Council-owned stormwater, wastewater and water supply networks.
- c. Encourage comprehensively designed, high quality and innovative, medium density residential development within these areas, in accordance with Objective 14.1.4 and its policies.
- d. Provide for medium density residential development in defined arterial locations identified as suitable for larger scale community facilities and guest accommodation.

[33] Ms Oliver’s reading of this policy, and the Higher Order Documents, was to the effect that not all land that fell within the KAC RMD criteria should be automatically rezoned. We take that as a given, but it does appear to us that Ms Oliver has to a significant extent “cherry picked” the parts of the Higher Order Documents that suit her argument.

[34] In answer to Ms Semple, cross-examining for HNZC, she considered the other factors in addition to those criteria that needed to be considered were amenity and character, demographic make-up of the affected community, and the likelihood of redevelopment.¹⁶

[35] She did not think the addition of these matters would be difficult for a lay reader, even though they do not appear in the relevant policy. She was asked:¹⁷

MS SEMPLE: Would you accept that a policy that is specifically entitled “Establishment of New Medium Density Residential Areas,” if those matters that you have identified are important criteria, that it might be useful for that policy to include those?

MS OLIVER: I believe a Strategic Direction in terms of character, amenity and urban form, and I have referenced that in my evidence, I do not think this policy needs to be altered in any way, I believe the Higher Order, the Strategic Directions objectives set out those matters, and they are also matters when considering the Act, sections of the Act, Section 5, 6 and 7.

[36] She also accepted that applying her criteria, two different planners at CCC could well end up with an entirely different outcome.¹⁸

¹⁶ Transcript page 56.

¹⁷ Transcript page 57, lines 7–17.

¹⁸ Transcript, page 59, line 24 to page 60, line 9.

[37] Ms Oliver was questioned by the Panel in relation to the monitoring policy, Policy 14.1.1.8. That included questioning from Dr Mitchell, Judge Hassan and the Chair.¹⁹

[38] The following exchange took place with Dr Mitchell:²⁰

DR MITCHELL: But is it about a better chance, isn't it more than that, don't we have to give very serious attention to establishing enough [RMD] land to ensure that those targets are delivered?

MS OLIVER: Absolutely.

DR MITCHELL: Not to hope that they are delivered and get to the end of the Plan and say – oh, we will now need to do some more because we were too slow off the mark?

MS OLIVER: Absolutely, I fully support that, and that is why I am saying, I just think there are some better areas or more appropriate areas in Papanui, but they did not strictly meet that policy criteria, that is what my evidence states.

[39] She was also questioned by Ms Dawson regarding her statement that there would not be a lot of difference between RSTD and RMD. She answered that in relation to smaller sites there could be one unit in difference,²¹ and stated further:²²

So for Papanui and Hornby I am not against, you know, in the locations that I have suggested at all, I actually support the medium density. Linwood I have found quite complex to look at in terms of – because it does have a very large swathe of transition zoning around it and so my preference is just in terms of the medium density. In a way this is, if it is more focused, I would hope that it acts as a catalyst to focus investment, focus the Council investment into that area directly around the key activity centre as opposed to potentially that large swathe of transition zoning.

And I also hope that it will encourage that site amalgamation, you know, in that more focused area and give some really good outcomes for Linwood that then may in time, you know, I would hope the market would pick it up in those focused areas and then in time look at extending it beyond. But multi-unit development is going to occur right around Linwood and right through into the city, it is already doing that very sporadically but – so there is no[t] much difference. I think they are quite balanced in terms of the transition zoning and the medium density.

[40] Ms Oliver also acknowledged that she was reacting to community concerns of the potential for “ghetto like” development from RMD. But she did go on to say that a lot of her

¹⁹ Transcript, page 61 and onwards.

²⁰ Transcript, page 63, lines 30–43. The transcript incorrectly identifies the questioner as Judge Hassan.

²¹ Transcript, page 66, lines 13–27.

²² Transcript, page 67, line 34 to page 68, line 6.

recommendations were beyond the District Plan. But she felt, and it was her hope, that in a partnership with say HNZA:²³

...same with some other investors looking at urban renewal programmes, that we actually can – there is more chance, in my view of getting public and private investment in a more focused area and then delivering on it.

[41] She also mentioned the difficulty with parts of Linwood accessing the KAC where the present route was generally through Linwood Park.

[42] In answer to Judge Hassan, relating to the demographics of Linwood, she eventually accepted:²⁴

JUDGE HASSAN: And that demographic alone would suggest, proportionately, we should be providing more multi-unit developments in Linwood than elsewhere in the city, doesn't it?

MS OLIVER: Yes.

[43] She was questioned further by Judge Hassan in relation to the question of need and the finding in our Decision 10: Residential — Stage 1 decision that the CCC had been unduly focused on the matter of need. Ms Oliver was questioned in relation to her reliance on Mr Blake and why he was called and in the finish she conceded she was only talking about Papanui and Linwood. The exchange continued:²⁵

JUDGE HASSAN: But you do understand that the specific finding the Panel made based on the evidence we heard from Dr Fairgray and Mr Schellekens and now Mr Blake supports, is effectively that there will be a very low return on RMD across the city anyway, that there is nothing specific to Papanui or Linwood that make them any different in that respect, you agree with that, that is what the evidence is?

MS OLIVER: Yes, broadly, yes.

JUDGE HASSAN: Yes, and that the Panel is concerned that the Council is taking an undue focus on need and in that respect, so is your evidence. Is that a fair comment, perhaps with the word undue out, it is just a theory of your evidence that you focus on need as one of two issues across both Linwood and Papanui?

MS OLIVER: Yes, I recognise there is a community need for additional housing and some smaller household units around these key activity centres, I fully accept that.

²³ Transcript, page 69, lines 27–30.

²⁴ Transcript page 72, lines 26–30.

²⁵ Transcript page 76, lines 11–28.

[44] She also accepted in questioning from Judge Hassan concerning the issue of amenity that Policy 3.3.7(b) of our Strategic Directions was referring to areas identified in those regards by the Plan.

[45] She was questioned by the Chair regarding monitoring.²⁶

SJH: ... Just going back to Dr Mitchell's questions around monitoring, I got the impression that you might get something useful in the latter part of a 10 year period from the monitoring, if that?

MS OLIVER: Yes.

SJH: By which stage we will have almost reached 2028, the target for new housing intensification targets et cetera?

MS OLIVER: Yes.

SJH: So as it stands that not going to help us very much at all?

MS OLIVER: No, I think five years we do – we run our monitoring programme every year so within five years you begin to see something, within 10 years we will have a better idea and – yes.

SJH: But the horse can very well be, given that we know about slow uptake and such like, well and truly bolted?

MS OLIVER: In terms of?

SJH: In terms of meeting intensification targets.

MS OLIVER: Yes, it is a challenge.

[46] In relation to transition zones she was asked, "What is the purpose?", and answered:²⁷

... It was meant to, from my understanding and it has come from two district previous plan reviews, it was supposed to be a soft transition between the suburban area and the higher density areas.

[47] She was asked had it been successful, and she responded "no", accepting that if areas were zoned RMD and the transition period would be 10 to 20 years as she had stated, there would be little point in a transition zone. Her final answer to that was "I accept that to an extent."²⁸

²⁶ Transcript, page 79, line 41 to page 80, line 23.

²⁷ Transcript, page 80, line 30.

²⁸ Transcript, page 81, line 1.

[48] Further questioning followed, and a discussion relating to the social survey she recommended, continuing:²⁹

SJH: Well I accept what you say to varying degrees different centres have different issues. But you will be aware of the evidence that we have heard that the Eastgate Mall in that KAC is in greater need of assistance, if I can put it that way, than any other?

MS OLIVER: I fully support that, and I think it comes down to when you look at the disposable income of this catchment it is quite significantly less than other centres and their catchments.

SJH: And we have established there is a greater need for multi-unit dwellings?

MS OLIVER: There is a greater need for comprehensive developments, developments that are done well, designed well, yes.

SJH: And these will be restricted discretionary activity?

MS OLIVER: Yes.

SJH: Which will allow the Council, because all the other matters of rules will be the same for Merivale as they will be for Linwood, won't they?

MS OLIVER: Yes. Specific to the zoning, yes.

SJH: So that is down to the Council and how they apply it to ensure quality, isn't it?

MS OLIVER: Absolutely. And the developments that come forward.

[49] Ms Schröder gave urban design evidence for CCC. She noted the variation within the notified areas, but in relation to Linwood West, she stated:³⁰

... again I consider that the area is appropriate for an RMDZ but believe that comprehensive redevelopment may be limited due to the existing development pattern.

[50] In relation to Linwood North, she stated:³¹

... I consider that the area does not contain character values that are important and should be maintained. In addition, I believe there is considerable opportunity provided by the development pattern for comprehensive development. However, I am hesitant to recommend rezoning given the intactness and quality of existing housing.

[51] In relation to Linwood East, she accepted that it did not contain character values that were important and required maintenance. She said the sub-area east of Jollie Street,

²⁹ Transcript page 82, line 35 to page 83, line 16.

³⁰ Evidence in chief of Josephine Schröder on behalf of the Council at 3.1(h).

³¹ Evidence in chief of Josephine Schröder at 3.1(i).

containing a predominance of HNZN sites, had the most current potential for comprehensive development. She continued:³²

While comprehensive development could be achieved in the remainder of Linwood East, I am hesitant to recommend it on the basis of the quality and intactness of existing housing, but also the future potential of the area for increased residential capacity when the life of the existing housing diminishes.

[52] Finally, in relation to Linwood South, she did not consider the area appropriate for RMDZ because of the limitation for comprehensive redevelopment in conjunction with the lack of quality pedestrian links to and within the area that provides an appropriate and safe level of pedestrian connectivity.³³

[53] She agreed with the evidence of Mr Edward Jolly,³⁴ that where sites were amalgamated over the rest of the areas for rezoning, the increased height limit of 11 metres was appropriate. She also considered that an increased building setback of 3 metres would assist in off-setting the effects of transitions. She noted it had not been requested by anyone through submissions but she considered it to enable better amenity.

[54] Ms Schröder took as her starting point Policy 14.1.1.2, as had Ms Oliver. But Ms Schröder considered a number of factors should also be taken into account, including character and amenity. She did accept that it was confusing for a lay person in a policy entitled ‘Establishment of New Medium Density Residential Areas’ that these additional matters were not clear. But she considered they were clear in other policies. She referred, in particular, to Policy 14.1.4.2. Although Ms Schröder considered matters of character and amenity were covered in Policy 14.1.1.2(c) by the reference to high quality, she did accept there could be difficulties for a lay reader in that.³⁵

[55] One of Ms Schröder’s concerns expressed to Ms Dawson was that during the transition period, which apparently is quite long in Christchurch, the CCC may not have the ability to put in place the necessary open space infrastructure. She noted that in Riccarton and St Albans, and even Papanui, the CCC have substantive programmes to effect change to make those open

³² Evidence in chief of Josephine Schröder at 3.1(j).

³³ Evidence in chief of Josephine Schröder at 3.1(k).

³⁴ Mr Jolly also gave urban design evidence on behalf of the Council, but it was limited to the matters of height, and Council’s position in relation to HNZN landholdings.

³⁵ Transcript page 30, line 9 to 26

spaces better. Obviously, she is suggesting that would not occur in Linwood, but we have no specific evidence as to why.

[56] Ms Schröder also advised Ms Dawson that she had spoken to the CPTED adviser on the Council,³⁶ who had said there were a number of programmes going on in relation to Linwood Park that would see improvements to that connection between Linwood South and Eastgate. So she said the key issue would be the cross-connectivity to Aldwins Road from the Linwood South area, if Linwood Park was not used for access. In relation to open space amenities, she answered Judge Hassan:³⁷

JUDGE HASSAN: ... Now, as I understand your answers in regard to the public space environment and the importance of that, and then there is a question in my mind at the moment just to test around whether or not that is a dimension that should be in the policy or not. But if we look at, say, let us take Saint Albans or let us take one or two of the other established residential medium density areas around the city. Now, in terms of, say, improvement to this public space environment I would be fair to observe, wouldn't I, that the Council so far at this point in time, given how long those areas have been zoned, has provided for that amenity in some parts of the suburbs and not in others?

MS SCHRÖDER: That is right.

JUDGE HASSAN: So with that in mind, if one was to specify that as a prerequisite in the policy that the public space environment be improved, then in hindsight that would have seen a lot of those areas not being rezoned RMD at this point, wouldn't it?

MS SCHRÖDER: Yes, that is right.

JUDGE HASSAN: So you would not advocate for that being prerequisite to rezoning?

MS SCHRÖDER: No, not in itself, no.

[57] In relation to hesitance of advocating for RMD because of the intactness and quality of much of the housing, she responded to a further question from Judge Hassan:³⁸

JUDGE HASSAN: ... I also had a question on your reference and it appears in various parts of your evidence to this concept of hesitancy, you are "hesitant given the intactness and quality of much of the housing", you make that statement a number of times, and you referred to Mr Blake's evidence in terms of likelihood, do you recall that?

MS SCHRÖDER: Yes.

³⁶ CPTED is the acronym for Crime Prevention Through Environmental Design.

³⁷ Transcript, page 39, line 28 to page 40, line 6.

³⁸ Transcript, page 40, lines 10–27.

JUDGE HASSAN: Have you read the Stage 1 Decision?

MS SCHRÖDER: Yes, I have.

JUDGE HASSAN: So you are familiar with that, that the findings of that informed by the Council's evidence and the Crown's was that actually there is a very low likelihood of conversion to intensification anywhere, do you understand that?

MS SCHRÖDER: Yes, I do.

[58] In re-examination, Mr Winchester took Ms Schröder through Policy 14.1.1.2, which she accepted sat under Objective 14.1.1.³⁹ He also referred her to Objectives 3.3.4(a) and 3.3.7. In particular, in relation to the latter one, he referred her to sub-clauses (b) and (h). She accepted that those matters covered the concerns she had expressed to the Chair.

[59] Mr Blake gave evidence for the CCC. He was a director of Valuations and Research at Knight Frank. Effectively, this evidence was in relation to the established and intact housing existing in some of the areas we are concerned about and essentially the potentially slow uptake for RMD. That had already been well explored in Decision 10: Residential — Stage 1 and accepted by the Panel. He was questioned by Judge Hassan:⁴⁰

JUDGE HASSAN: ... Just in answer to Mr Osborne's evidence you commented before around zoning and you said coupled with demand. I took from your answer that really if one boils it all down you do not really substantially differ from Mr Osborne on that?

MR BLAKE: No, I do not but I just wanted to draw the distinction that by creating a new zone there should be no expectation there is an automatic increase in values.

JUDGE HASSAN: Yes, but zoning, on the other hand, is a factor that can influence demand?

MR BLAKE: Absolutely.

JUDGE HASSAN: And now, you refer to the evidence that the Panel heard in making its findings in Decision 10, and you have read Decision 10 for those findings, which is the Residential Stage 1 decision.

MR BLAKE: Yes, I have read it in part, yes.

JUDGE HASSAN: Well, I take it you read the RMD part?

MR BLAKE: Yes.

³⁹ Transcript, page 42.

⁴⁰ Transcript, page 48, line 30 to page 49, line 19.

JUDGE HASSAN: All right, so in terms of that, of course, the theory of those findings were on the basis of a lot of consensus in the middle of different opinions between the different experts was one consensus being, in effect, the rate of return is very low in terms of RMD, and that is the theory of your evidence here, so am I right to assume that really you are not saying anything different in that regard pertaining to the proposed new areas. Effectively, it is the same?

MR BLAKE: Yes, that is correct.

[60] In answer to the Chair, Mr Blake also accepted that he did not consider the intensification targets in the Higher Order Documents were relevant to his brief.

[61] Mr Blake accepted that in areas where there has been intensification in Christchurch from in-fill smaller units etc., there had been no drop in value. In some areas, such as Merivale or Riccarton, he said there had been an increase in value, in part as a result of the increased density opportunities.

[62] Finally, in answer to the Chair, he stated:⁴¹

SJH: Now, I just spoke to you about RMD and acceptance of it being low yielding and somewhat unpredictable for delivering on intensification and in our decision we referenced that and then said, “Given those factors, we find on the evidence it is better to take a prudently generous rather than a barely sufficient approach to the provision of RMD zoning.” Would you take issue with that?

MR BLAKE: No.

SJH: So, in other words, if Christchurch is to meet its intensification targets we probably need more, not less areas of RMD because of the low yield.

MR BLAKE: Yes.

[63] We also heard from Mr Brian Norton, on behalf of CCC, relating to stormwater. His evidence was to the obvious effect that intensification on residential sites will create more impervious surfaces which will generate more stormwater run-off. Mr Norton said this can adversely affect CCC’s ability to maintain the required level of service by causing more frequent and severe flooding, erosion and contamination of natural water bodies.

[64] He particularly identified some areas of Linwood. He noted that parts of the RMD areas in Linwood, as notified, were within the 200-year flood plain as mapped by the CCC’s current flood modelling results. He considered the cumulative filling and development of properties

⁴¹ Transcript, page 50, lines 24–37.

that have at least 50 per cent of their land affected by flooding will have adverse effects on other low-lying private properties. He therefore opposed a long list of properties being rezoned.⁴²

[65] In his supplementary evidence, Mr Norton set out the process when a resource consent is lodged for development of new residential structures within the FMA. That is something we have already dealt with and are aware of.

[66] In answers to the Panel, Mr Norton accepted that the map he used was based on the most recent flood model and that it may not align exactly with the FMA area maps. We received no evidence of this new modelling and it was unexplained.

[67] Ms Dawson questioned Mr Norton about previous Living 3 Zones rolled over in RMD that seemed to be in a similar situation to the Linwood areas he identified. He stated that the reason was that the flooding “may be confined mostly to roads where may be possibly filling of areas along roading may not actually affect other low lying properties.”⁴³ It was then put to him that from the maps it did not look like that and he responded:⁴⁴

I think there are flooding areas in the originally proposed RMD areas but I feel that they could mitigate the effects of that.

[68] Then, Ms Dawson asked:⁴⁵

MS DAWSON: Do you think there are differences between how the flooding would occur and could be mitigated in these new RMD areas compared with the ones that are - - -

MR NORTON: Just specifically the Linwood area is the only one where I do not believe – I think there is a reasonable chance that there could be recommendations for decline of resource consents in those areas based on the effects of filling.

MS DAWSON: But like right across St Albans, for example, Papanui, where there are clearly areas of dots on the maps you feel that they could be dealt with through mitigation in a way that Linwood could not?

MR NORTON: I think there are areas where there could be requirements that would restrict development. I think anywhere where there is the flood management area there is the potential that development will need to be restricted somehow.

⁴² Evidence in chief of Brian Norton on behalf of the Council at 4.12.

⁴³ Transcript, page 17, line 24.

⁴⁴ Transcript, page 17, line 37.

⁴⁵ Transcript, page 17, line 40 to page 18, line 11.

[69] Then he was questioned by Judge Hassan:⁴⁶

JUDGE HASSAN: I have got a difficulty with your evidence now in terms of whether or not it is inconsistent with your evidence then. Part of that difficulty is in the vagueness of your answers. So in your answer to Ms Dawson around existing areas of RMD and the potential for decline which you acknowledged. Do you think that is a significant potential of that particular RMD zoning or an insignificant proportion of it?

MR NORTON: Significant meaning could it happen at all?

JUDGE HASSAN: Well significant in the sense of the Council being able to deliver on the Regional Policy Statement and the Strategic Objectives around intensification. Do you think it would have a significant consequence for being able to deliver on that?

MR NORTON: Probably not.

JUDGE HASSAN: But you do not know, because you have not done the work, have you?

MR NORTON: It would be quite an undertaking to do flood modelling for the number of scenarios required.

JUDGE HASSAN: And if we take Linwood, your answers indicated that they related to developer expectations, do you recall that answer, that developers, when they see up-zoning would think they could develop?

MR NORTON: Yes.

JUDGE HASSAN: It was not related in any specific sense to your analysis of that particular area and its proclivity for flooding, was it?

MR NORTON: No.

JUDGE HASSAN: And in that sense your analysis there is no more precise than it is for the other areas, is it?

MR NORTON: No.

[70] He was then questioned by the Chair:⁴⁷

SJH: There are a number of notified RMD zones we heard about earlier with flooding overloads?

MR NORTON: Yes.

SJH: Your map differs from the decision map?

MR NORTON: My map is?

⁴⁶ Transcript, page 20, lines 1–41.

⁴⁷ Transcript, page 21, lines 3–40.

SJH: Your map differs from the decision map?

MR NORTON: I have not compared them.

SJH: Should you have compared them?

MR NORTON: If the question were whether or not a property is affected by flooding, I would say no. If there is an importance in a consistency between the FMA map and RMD map, I would say yes.

SJH: In terms of [para 1.5 of your evidence in chief], should you have compared them?

MR NORTON: I suppose.

SJH: Have you done a specific comparison for all of those earlier areas that are RMD with the overlay where no comments like you are making now was made, with the Linwood property by property?

MR NORTON: The scope of my original RMD evidence did not cover the effects of filling in flood areas.

SJH: Have you compared those properties with the Linwood properties?

MR NORTON: Not specifically, no.

SJH: Can you say are they different or not in flooding terms, and the potential for flooding?

MR NORTON: I am specifically aware of ponding areas in Linwood which I believe would be difficult to mitigate.

[71] The first witness for HNZN was Mr Philip Osborne, an economist who had given evidence at previous hearings. By and large, he based his evidence on that earlier evidence but applied it more specifically to the HNZN properties involved in this hearing. He concluded:⁴⁸

- 11.1 The ability for Christchurch to produce an efficient and affordable place to live is based on its ability to intensify residential development into the existing urban area. This objective is a clear direction of the Strategic Directions and other higher order documents and needs to be coupled with a clear message to the market regarding the potential redevelopment capacity that exists in appropriate locations.
- 11.2 The provision of intensified residential activity is not only necessary for residential amenity and accessibility but for the commercial viability and competitiveness of the centres themselves.
- 11.3 When considering the potential shortfall represented, in part, by the provision of RMD in Christchurch it is important to recognise the potential costs of a housing market that does not function well. Increased private costs are coupled with less efficient and effective public infrastructure as well as falling levels of competitiveness.

⁴⁸ Evidence in Chief, Philip Osborne, 11.1 – 11.5.

- 11.4 It is my economic opinion that the provision of greater capacity of RMD, and the removal of the Lower Height Limit Overlay as sought by the Housing New Zealand in Papanui, Linwood and Hornby represents an appropriate means by which to meet the objectives of the plan due to:
- (a) The potential inability for the market to supply sufficient capacity and diversity under the current pRDP provisions;
 - (b) The inappropriate application of, and controls to HNZ properties;
 - (c) The provision of greater residential diversity and density around KACs;
 - (d) Provides increased certainty regarding the long-term urban form outcome;
 - (e) Provides greater confidence and certainty within the market regarding the effectiveness of intensification;
 - (f) Reduces the potential for pressure to development additional greenfield sites; and
 - (g) Increases the provision of a diverse range of affordable and social housing options.
- 11.5 It is my expert opinion that the relief sought by Housing New Zealand will better achieve the objectives of intensified and appropriate residential development.

[72] In his highlights package he stated:⁴⁹

The RMD represents an opportunity for Christchurch to provide sufficient enabled capacity to the market to meet future residential demand in an efficient and effective manner and at a level that provides both resident and development choice at a viable level.

[73] In that package he considered there was sufficient reason for concern, noting that the economist for the CCC in the earlier hearing, Dr Fairgray, considered that between 57 and 70 per cent of the targeted intensification needed to come within Christchurch City. He noted the Crown expert had a higher figure of 90 per cent.

[74] Mr Osborne went on to say:⁵⁰

A further issue of concern is the ability for the Plan to meet long term residential demand requirements. Limiting intensified residential development in appropriate and efficient locations has the potential to undermine the ability for intensification in the future. Low density development around centres has the potential to increase

⁴⁹ Transcript, page 87.

⁵⁰ Transcript, page 89, line 7 - 21

improvements, improvement values, thereby reducing long term development viability still further.

That is to say that by allowing some development in an area it has the potential to take away opportunities for denser developments later on. This coupled with the real potential for an overall shortfall of viable capacity is likely to put increasing pressure on greenfield locations for residential development. **This is likely to have significant infrastructure implications for Christchurch city potentially increasing the cost of living and reducing economic efficiency.** [Our emphasis]

[75] Mr Osborne referred to the evidence of Mr Blake and responded as follows:⁵¹

The evidence presented for Council by Mr William Blake outlines some of the very real issues that relate to enabled versus viable capacity within the market. While I agree with the commercial factors outlined by Mr Blake regarding the development potential I disagree that zoning does not play a fundamental role in this viability.

Zoning essentially changes the value of activity that can occur in a given location thereby changing the value of the land itself and having listened to Mr Blake this morning I would agree that part of that, the relationship between the zoning and the demand is important, however there is, in the market, there is more than simply a recognised demand. There is also a speculative or an expected rise in price. We see a lot of land banking and things like that where the value of land has been pushed up in anticipation of growth rather than the current demand being actually in the market itself.

[76] He was cross-examined extensively by Mr Winchester, but we do not consider that affected his overall conclusions, and it is evidence that we accept.

[77] Mr Osborne was questioned by Dr Mitchell regarding Mr Blake's evidence:⁵²

DR MITCHELL: ... Mr Blake in his paragraphs 4.9 through 4.11 give the example of residential property in Hornby saying it has got a \$450,000 nominal value, \$25,000 to move the house off, 600 square metres of land meaning that the effective cost of development of the land is \$792 per square metre, if you just accept that those numbers are correct. He then says that is the equivalent land cost of land in Fendalton or places like that and as a consequence his conclusion on that is therefore the highest and best use of the land in Hornby would remain – would be remaining as a single family home. Do you have any comment on that?

[MR OSBORNE]: I disagree with that. The highest and best use for the piece of land, if you were to rezone that medium density as we have talked about and I believe that Mr Blake agreed, if there is demand for that type of product then the value of that land will go up, and in terms of the value of the land going up, that would reflect the fact that the use that is now on it is in fact higher and better for that piece of land. So the fact that an activity drives land values is exactly what we are talking about in terms of that, and the better the activity, typically, as long as it is appropriate, it drives those values up and it reflects to have better use.

⁵¹ Transcript, page 89, line 31–46.

⁵² Transcript, page 97, line 2–24.

[78] Ms Dawson questioned him about the difficulties confronting the Eastgate KAC:⁵³

MS DAWSON: ... with the Linwood KAC or Eastgate, it is a relatively confined KAC compared with some of the other bigger ones we have been looking at, and we have had evidence around the socioeconomic profile of that area and as in all areas the low percentage of uptake of more intensive development around about it, but if that wider area was zoned RMD, and at some level of realistic uptake of more intensive development, in that community and for that centre, to what extent would that actually make a difference to the economic viability or the economic strength of Linwood KAC?

[MR OSBORNE]: I think that is a very good question, because it is quite a unique centre in the way that it retains spend especially and I think that has been talked about earlier this morning, that there is a considerable amount of leakage from that and that in itself is a reflection of the quality of the offer that is there. That quality of offer is driven essentially by demand. It is a vicious cycle as it were. Low demand, low quality, and therefore people do choose to shop elsewhere. The propensity for that to actually improve is driven in part not only by decisions that the retailers in the commercial space make in terms of improving that quality, but by the amount of dollars that go into that centre. And even if you are capturing a small amount from a larger pool, you are more likely to get those fundamental shifts. So if you have more population around that area, and even if the same small proportion of that increase is spending there, you are likely to get the quality shift that will in fact entice other people back in, which is what Eastgate essentially needs. It needs the retention of that spend; it needs the retention of the employment to actually fulfil its role in the community.

[79] In relation to the comparison between RMD and RSTD, he accepted that he had not looked at a comparison between the two, but continued:⁵⁴

MR OSBORNE...but I probably could make comment on the fact that some of the things that are hoping to occur are the agglomeration of sites and so forth in order to make medium density actually viable in this. And I believe under the transitory zone those sorts of heights were not facilitated or provided for, and so the restriction of those heights are likely to go beyond simply just the capacity difference between the two zones, but in fact impact on the viability of development itself and impacting on the viability of development itself, it is likely that a proportion of that zoning will not actually occur or is less likely to occur. I mean we have heard already that the chances of medium density are quite small in terms of their percentage, but that would reduce still further for the transitory zone because a lot of those properties would not be viable without the height.

MS DAWSON: And was that similar to the answer I think you gave to Mr Winchester so I think I wrote it down. You were answering there in relation to the height restriction was similarly that it would limit both the capacity but also tipping over to a more viability of the redevelopment.

MR OSBORNE: Absolutely, yes.

⁵³ Transcript, page 97, line 32 to page 98, line 17.

⁵⁴ Transcript, page 98, line 36 to page 99, line 14.

[80] Ms Rennie was an urban designer who gave evidence on behalf of HNZN.

[81] Her evidence was that HNZN sought to ensure sufficient RMD capacity to allow for a range of housing choices, increased density of development and the ability to integrate those developments into the community.

[82] Ms Rennie considered, in relation to Linwood East, that the opportunity for residential intensification and comprehensive redevelopment within walking distance of a commercial centre that is also within 3 kilometres of the central city and a range of public transport options cannot be underestimated, particularly in the context of Objective 3.3.1(a) of the Strategic Directions Chapter.

[83] Overall, she considered the policy and rule framework outlined for RMD is appropriate in addressing both existing neighbourhood character and amenity issues in the context of intensification, and in delivering the quality of development anticipated with respect to Policy 14.1.1.2(c).

[84] In relation to Linwood South and the additional properties sought for inclusion, she appreciated there may be perceived safety concerns in relation to pedestrian connection with Eastgate, but she considered that improvements could be made to the route or alternative connections could be provided to support the wider Linwood South community. She said the additional properties requested on Mackworth Street are consistent with those that have been included in the notified RMD proposal and do not possess any specific characteristics or qualities that would warrant their exclusion.⁵⁵ She repeated her comments around Policy 14.1.1.2(c) that she made in relation to Linwood East.

[85] Finally, she considered the 8 metre limit in the lower height limit overlay would result in very little difference between the RMD and RSTD zones.

[86] When asked a question from Ms Dawson regarding the efficacy of built form standards:⁵⁶

MS DAWSON: How confident are you that the built form standards and the urban consent controls are sufficient to address any moderate to even long term

⁵⁵ Transcript, page 104, lines 9–13.

⁵⁶ Transcript, page 113, lines 7–24.

impacts that there may or may not be on neighbours as a result of the change over that period of time.

MS RENNIE: I am confident that the activity status, the rule package and the assessment matters combined provide a reasonably rigorous package to assess applications that come forward in the RMD zone. I acknowledge that obviously one or two units will not necessarily trigger RDA but they will still be required to consider the built form standards.

The built form standards have been refined over time following the L3/L4 Plan change, and obviously through the Stage 1 hearing there has been consideration of those built form standards. They cover a range of urban design issues from contextual issues through to relationship between properties in relation to the impacts on the street scene, I am confident that the suite of rules in assessment matters enables the ability to achieve a good urban design outcome.

[87] Ms Huria questioned her about the effect of living next to higher properties if you were in a one storey home.⁵⁷

MS HURIA: ... do you factor into your thinking on these matters what it might be like to be living in a one storey home that you raised your family beside an 11 metre high, intensive dwelling?

[MS] RENNIE: Yes, I think about that a lot actually, and one of the challenges we have in many of our areas that we are talking about is the housing stock is often one storey in height. **We need to remember that that is not the baseline situation, but that house can be two storeys. It can be ... two storeys in terms of height, so we need to balance those considerations against other provisions and other considerations in thinking about character and amenity.**

The built form standards are the way that we manage those situations where we do have a contrast between a one storey house on one side of the fence and potentially three storey units on the other side of the fence.

[our emphasis]

[88] Finally Ms Styles, a planner, gave evidence on behalf of HNZC. She identified the resource management issue with reference to this proposal as a need for provision of housing in terms of capacity, intensification and choice. She pointed out this issue is clearly stated in the Higher Order Documents and within Strategic Objective 3.3.1.

[89] She considered the areas notified as additional were required to meet the Higher Order Documents and to meet the needs for residential household growth set out in the CRDP Strategic Objectives.

⁵⁷ Transcript, page 114, lines 23–42.

[90] In the course of cross-examination by Ms Scott, the witness was asked how she had identified that the notified RMD areas and HNZC's additional RMD areas were consistent with those statutory documents:⁵⁸

MS STYLES: It is my opinion, having read those documents and looked at these areas, that they are consistent with the intent of those provisions.

MS SCOTT: Where are your calculations in terms of the numbers?

MS STYLES: That is not a comment about numbers, that is about the intent of those documents to achieve greater capacity for growth.

[91] In answer to Ms Dawson, Ms Styles confirmed the evidence given by Ms Rennie in relation to built form standards, the rules package, consenting requirements etc., as follows:⁵⁹

MS STYLES: I believe that they are a comprehensive package, not just of rules but also to direct the process so that together the rules as a package provide for effects being sites, so privacy overlooking sunlight et cetera. They deal with the effects of a development on its area in terms of the way it relates to the street and the wider context, and they also through the activity status of being restricted discretionary, allow a level of assessment, possibly negotiation or discussions, and ultimately the ability to decline an application if it was seen to be creating such detrimental impacts on neighbours or the environment.

[92] Judge Hassan asked her questions relating to the strategic directions:⁶⁰

JUDGE HASSAN: So, then if we look at 3.3.7 which is Strategic Objective 3.3.7, it comes into the equation under the objective, does it not? The objective that we referred to, objective 14.1.1 references this objective, in its first Roman numeral where it says "an increased supply of housing that will enable a wide range of housing types, sizes and densities in a manner consistent with two named objectives, one of which is 3.3.7".

Now, the Council cross-examination on this objective has tended to focus, I think from memory, on B and F, is that right? Is it H? You had a question on H and you had a question on, I think, B. Do you recall those from Ms Scott?

MS STYLES: I recall H, I am not sure that she referred B.

JUDGE HASSAN: So, just looking up a bit from H though, is D relevant?

MS STYLES: Very much so.

JUDGE HASSAN: Why?

⁵⁸ Transcript, page 124, line 37–43.

⁵⁹ Transcript, page 126, lines 30–38.

⁶⁰ Transcript, page 128, lines 1–33.

MS STYLES: Because that is about providing housing development opportunities specifically around key activity centres which is exactly what we are looking at here.

JUDGE HASSAN: What about E, is that relevant?

MS STYLES: Yes.

JUDGE HASSAN: In the same way, is it?

MS STYLES: Correct.

[93] In relation to Linwood, we prefer the evidence of the HNZN witnesses to that of the CCC.

[94] Dealing first with Mr Norton, some of the areas in Linwood identified as RMD do not appear on the hazard maps or are mapped as FMA. It is said to be reliant upon new modelling of which we have received no evidence. We understand Mr Norton's final answer to the Chair to be that he accepted that the hazard rules deal with the situation we are concerned with. In any event, in closing for the Natural Hazards Stage 1 hearing, the CCC's legal submissions stated:⁶¹

It is submitted that the evidence has demonstrated that the models which underpin the approach to flood hazard mapping and the application of related controls in the pRDP are appropriate and fit for purpose.

[95] We have heard no evidence in this hearing to suggest that submission, which we accepted, was incorrect. We accept it again. We acknowledge the Council submission in closing that in our Decision 10: Residential — Stage 1 we relaxed built form standards. The Council said this led them to look at flooding issues again. While that is correct, we are satisfied that the various flooding provisions adequately guard against the issues raised by Mr Norton.

[96] We agree with Ms Oliver's position that merely satisfying the criteria within 14.1.1.2(a) is not sufficient in itself. There are clearly wider considerations to take into account. That fact is made clear by reference to the Higher Order Documents. Our concern is that the CCC witnesses and Mr Winchester in re-examination focused only on some of those.

[97] Clearly, the starting point is the Strategic Directions Objective 3.3.1(a). We note that that objective requires all other objectives in the chapter to be expressed and achieved in a

⁶¹ Closing submissions for CCC (Chapter 5: Natural Hazards), 18 March 2015, at paragraph 6.3.

manner consistent with that in Objective 3.3.2. We also note that all objectives and policies in all chapters of the plan are to be expressed and achieved in a manner consistent with the objectives in Chapter 3: Strategic Directions.

[98] Objective 3.3.4 sets out the targets, while 3.3.7 is an objective relating to urban growth, form and design. We do not consider that the various subheadings within that objective are matters to be read in isolation. They are all important, and where relevant, carry equal weight. The CCC witnesses and Mr Winchester seem to have ignored clauses (d) and (e), which are just as relevant as the matters referred to, that seems to support the position of CCC.

[99] We were somewhat surprised by Ms Oliver's evidence that a social impact assessment needed to be carried out for Linwood before any rezoning took place. This was slightly contradictory with her recommendation of RMD for other parts of the city in any event. The first reason is we would have expected the CCC to be familiar with the requirements of the residents of the area, particularly as it was described by a number of witnesses as a deprived area. Secondly, there is no evidence to show that Linwood is somehow unique within the Christchurch urban area in regard to demographics. There are undoubtedly other deprived areas as well. Thirdly, Ms Oliver herself accepted that given the demographics of the area there was a need for smaller housing choices. Overall, we consider the approach taken by CCC does not give enough weight to the need set out in 3.3.4(b) for a range of housing opportunities:

... to meet the diverse and changing population and housing needs of Christchurch residents, including:

- (i) a choice in housing types, density and locations; ...

[100] We also do not accept Ms Schröder's evidence where she identifies areas as appropriate for RMD but is hesitant to support rezoning because of the settled current stock of housing. For that she relied on Mr Blake's evidence. However, as noted earlier, he did not take issue with our statement, "Given those factors, we find on the evidence that it is better to take a prudently generous, rather than a barely sufficient, approach to the provision of RMD zoning." He also accepted that if Christchurch was to meet its intensification arguments there was probably a need to zone more RMD rather than less, because of the low yield. Frankly, that undermines Ms Schröder's evidence and we do not accept the hesitancy she displayed as being justified.

[101] Before concluding this matter, it is appropriate we consider the community submissions we received in relation to Linwood. We note that none of those submitters called expert evidence to support their case.

[102] The first was Mr Davies on behalf of the Hagley/Ferrymead Community Board (RMD104, RMD-FS16). His Board's concern was that it was a sprawling suburb and that there are already some more densely populated areas for a range of reasons, with single young individuals with a lot of house sharing and flatting. This led to social problems. It was his Board's view that increasing the density of housing could see a potential for these social problems to be "enhanced". We presume he meant increased. He stated that there were fears that the intensification of Eastgate could lead to a ghetto-like situation, and because there was little home ownership in the area, developers would have an opportunity to capitalise on the rezoning. He also expressed concerns about infrastructure and referred us to page 33 of our Stage 1 decision (presumably to [102]) relating to what we had been told by Ms O'Brien, that even if an infrastructure upgrade for a certain area was not in the upgrade programme, the CCC would still look to programme it "if the District Plan identified further intensification there" and to "programme the upgrade accordingly to meet those growth pressures".⁶² It appeared he had concerns that the Council would not meet those obligations or, alternatively, if they did other areas may miss out.

[103] In answer to questions from the Panel he accepted that good urban design was an important response to the risk from what he described as a "ghetto". In explaining to Judge Hassan what he meant by that, he stated it was a higher intensity of poverty which would lead to social problems such as drug abuse and domestic abuse.

[104] In answer to the Chair, he accepted that those were issues for his community. He also recognised that his community needs assistance. Finally:⁶³

SJH: Well I understand that but the two go hand in hand because the higher order documents tell us we must give effect to that. I am just wondering though that if this was done properly and the Council would have controls because it is restricted discretionary activity so three units or more, and given what you heard this morning that it is not going to happen overnight it is over a considerable period of time, could it not be a benefit to your community?

⁶² Decision 10: Residential — Stage 1 at [102].

⁶³ Transcript, page 134, line 45 to page 135, line 10.

MR DAVIES: As I stated I think that yes, I think that if the development is [done] well, if there was good urban design, if we saw money put in to cater for that but I also do not hear evidence of that being an essential to development.

[105] Next, Ms Penno gave evidence on behalf of a friend, Ms Beecroft, who was overseas. Ms Beecroft (RMD78) was a freehold homeowner in the suburb, and had been a resident for 20 years. She did not think the suburb was up to absorbing the effects of rezoning and the types of development that would ensue with RMD. She considered it would cause adverse effects in Linwood, although recognising that some development was needed in Linwood. In answer to the Panel Ms Penno, on her behalf, stated:⁶⁴

I do not think I am misrepresenting her to say yes, I think she would agree with that. Her main concern is quality of those multi-unit dwellings.

[106] We are quite satisfied in the evidence we heard in this chapter, and earlier, that the Eastgate KAC is the one that requires the most assistance in Christchurch. The areas that we required to be notified were originally included, but taken out by Councillors. While we have received more information regarding Papanui which would explain the reasoning for this, we do not have that benefit for Linwood. We are well satisfied that not only the KAC, but the surrounding areas, represent a deprived area that requires support from the Plan. It has also been conceded that it requires different housing stock, a greater choice of housing stock, and modernised, warm, insulated and dry houses. These include the need for a greater number of small houses.

[107] We noted above the KAC criteria on its own is not enough, but if one considers the Strategic Directions and the Higher Order Documents that informed and gave rise to those Strategic Directions, we are quite satisfied that they all require that there is additional RMD needed in Christchurch, with a particular need in this area. We are satisfied in this particular area that if it is carried out in accordance with the objectives, policies and rules, and with the height limits we will turn to, it gives a significant opportunity for the rejuvenation of the area. We note that any significant development will be RDA, which will give the Council control to ensure the requisite quality is met. We consider that activity status ought to allay the community concerns expressed by the submitters.⁶⁵

⁶⁴ Transcript, page 140, lines 43–45.

⁶⁵ We also heard from Philip Ma'ama'a Faletanoai-Evalu (RMD124) and Christian Jordan (RMD91), who expressed similar concerns.

[108] We have rejected the evidence of the Council witnesses opposing RMD in this area, and accepted the HNZC evidence. On the basis of the evidence, and for reasons that we set out later in relation to scope at [127]–[140], we rezone all the areas as notified, in addition to those areas also sought by HNZC in its submission (also noting that this decision will amend our Decision 10: Residential — Stage 1, which was to zone the sites Residential Suburban Density Transition).⁶⁶

Hornby

[109] The Council's opening legal submissions supported RMD zoning for the notified areas, with four exceptions as follows:⁶⁷

- (i) Hornby North West — Moffett Street
- (ii) Hornby West — Parker Street, Foremans Road and Steele Street
- (iii) Hornby South East — Brynley Street
- (iv) Hornby South East — Trevor Street, Amyes Road and Blankney Street

[110] In closing legal submissions, the Council re-confirmed its position in submissions.⁶⁸ However, the revised planning maps attached to the closing legal submissions still continued to show the notified properties on Brynley Street as being retained, as well as additional areas on Brynley Street being proposed.⁶⁹ It also showed the notified areas in Trevor Street and Amyes being retained, but recommended deleting RMD for the sites fronting on to Blankney Street.

[111] Ms Oliver was questioned by Ms Dawson about the inconsistency in the evidence:⁷⁰

MS DAWSON: All right. So now just one other question about the Hornby, the Amyes Road, Brynley Street area where on, I mean, I think on one of your plans you show that you do recommend most of the notified rezoning in that area, plus some more. And although you have commented that it is a bit sporadic, it is just

⁶⁶ 75, 77, 77A, 77B, 77C and 79 Mackworth Street, Linwood

⁶⁷ Opening submissions for the Council at 5.1.

⁶⁸ Closing legal submissions at 3.1

⁶⁹ As sought in submissions from Harrison (10), Sun (72) and Lau (77)

⁷⁰ Transcript, page 71, line 4

separated out from the RSDT, and there could be a lot more there in time, are you still recommending that that be a start as you have shown on your plans?

MS OLIVER: Yes. I admit my evidence might be slightly misleading. I can support both approaches. I could support – I do think they are appropriate but it is the wider block. So you could either rezone them as a catalyst to a way of fixing up the boundary or the urban form in this area.

MS DAWSON: Yes.

MS OLIVER: So that would hopefully encourage a future plan change or urban regeneration plan. I don't know, whatever potential in this area, yes, or don't rezone it and just wait for a future plan change to look at it as a more consolidated block.

[112] We heard evidence from Mr Perry (RMD17) who resided at 524/4 Springston-Rolleston Road. He was a trustee in respect of the ownership of 72 and 72A Amyes Road. He opposed RMD on the grounds of traffic congestion; poor standards of maintenance and low architectural merit of existing multi-unit dwellings in the area or nearby affected areas; and he gave examples of responsible and attractive single-level development in the affected area. He considered there would be loss of amenity and light to existing households. He also considered it would impact on the value of his properties and the rents he received from them.

[113] He also called evidence from a real estate agent, Mr Robert Paton. His evidence was to the effect that RMD zoning would lead to very significant loss of value of Mr Perry's properties. Mr Paton claimed to be an expert witness. He had no expertise in any relevant area. He accepted the views he expressed were essentially a lay opinion. His evidence was of little assistance to the Panel.

[114] We also received evidence from Mr Houlston. He spoke to his submissions, speaking to problems he considered existed where intensification takes place, such as upsurge in crime, alcohol and drug fuelled violence, and graffiti. He also spoke of noise pollution, restrictions of sunlight and increasing difficulties of traffic. He said this was especially so as he was near Hornby Mall. He also expressed concerns as to the effect of climate change.

[115] Turning to the merits of what is proposed, we accept the Council's evidence and agree to deleting the notified areas on Moffett Street, Foremans Road, Steele Street and Parker Street.

[116] We find that the rezoning of the nine sites as notified on Brynley Street, along with most of the sites recommended by Ms Oliver (36, 38, 40, 42, 44, 46, 48, 50, 52 and 56 Brynley Street) will not create an anomalous pocket. This is particularly the case when combined with the additional sites proposed in Amyes Road and Trevor Street which all surround Branston Intermediate School (we will address Blankney Street shortly). For the reasons that we set out later in this decision, we do not consider that there are issues as to scope or natural justice. We do note for those additional sites on Brynley Street that were not notified as RMD, but which we proposed to rezone, this decision amends Decision 10: Residential — Stage 1 which zoned the sites Residential Suburban.

[117] We do not consider that, at this stage, the addition of 60 and 66 Brynley Street is appropriate. This would create an unusual zoning pattern along Brynley Street to the southeast of its intersection with Trevor Street, albeit that the character is one with multi-units. Under the current circumstances we decline the submissions of John Sun (RMD72) and Ki Lung Lau (RMD77). However, that is not to be taken that this area should not come under closer inspection in the future as to appropriateness of zoning RMD along that block.

[118] We agree to re-zoning the sites as notified along Amyes Road. These sites span both sides of the road and we consider their inclusion appropriate. However, as recommended in the planning maps in the Revised Version attached to Council's closing submissions, we agree that rezoning the pocket of RMD proposed along Blankney Street at this stage would create an inconsistent urban form in that area. Similar to our assessment in relation to Brynley Street, this does not mean that a wider review of RMD in that area at a later date might consider that more extensive RMD zoning along Blankney Street is appropriate.

[119] In summary, in relation to the Amyes/Blankney/Brynley/Trevor Street area, we concur with the revised zone maps attached to Council's closing legal submissions, except for the recommended rezoning of 60 and 66 Brynley Street, which we do not agree to.

[120] HNZA sought additional zoning of RMD at 23, 25, 27, and 29 Amuri Street, and 24, 26, 28, 30, 32, 34, 34A, 36, 38, 40, 42, 44, 46, 48, 50, 50A and 52 Gilberthorpes Road. The Council agreed to these areas in principle, and they are included in the Council's revised maps attached to its closing legal submission as an accepted addition to RMD. On the basis of that agreement, we also find RMD to be appropriate. For the reasons that we set out later in this decision, we

do not consider that there are issues as to scope or natural justice. We note that this will require us to replace the zoning maps that were decided in Decision 10: Residential — Stage 1.

[121] In relation to those remaining areas notified in Hornby, we agree that that RMD is appropriate and so rezone them.

Height limits for RMD covering previous Living 1 and 2 zones

[122] This matter arose in the context of an application to the Panel for a supplementary decision to Chapter 14: Residential — Stage 1.

[123] In that hearing the Council had sought a height limit of 8 metres for previous Living 1 and 2 zones, as well as central Riccarton. In this hearing they sought that same provision, but accepted if agglomeration of sites gave rise to a 1500m² site, the height limit could be 11 metres.

[124] In the course of that hearing, discussions took place and those provisions were accepted and agreed between CCC, HNZN and the Crown. It is covered by our supplementary decision.⁷¹

[125] There is no basis to apply different rules for the Papanui North, Linwood and Hornby areas, and those general height limit rules will apply here too. What it means is that there is also a significant incentive for developers to agglomerate land, which everyone agrees leads to a better urban design outcome.

Scope issues

[126] As noted earlier, HNZN before our direction for notification had taken place, approached the Council and then the Panel to add in some additional land for RMD zoning. At that request we did so, and no scope issues arise.

[127] However, in the lead up to, and during the course of the hearing, HNZN requested that we rezone as RMD two small areas in Linwood and in Hornby. The area in Linwood related

⁷¹ Decision 31: Residential — Stage 1: supplementary maps decision.

to six HNZC properties in Mackworth Street. In Hornby it related to 21 properties in Amuri Street and Gilberthorpes Road. Similarly, the same issue arises in relation to 10 sites on Brynley Street sought in the submission of Brett Harrison (RMD10).

[128] The Council raised questions of scope in regard to this, which was not addressed in closing by counsel for HNZC or any other submitter. HNZC has since been granted leave to file a supplementary closing.⁷² This reiterated a number of factors: that they were immediately adjacent to notified areas in Hornby and Linwood; met the criteria of Policy 14.1.1.2; were supported as being appropriate for RMD by the Council; did not possess any specific characteristics from an urban design point of view that prevented rezoning; were confirmed by the Council's infrastructure experts as not being subject to any impediments in terms of infrastructure; and being confirmed by Mr Norton as appropriate for rezoning from a stormwater perspective.

[129] While the Council supported the rezoning of these properties as RMD on the merits, they questioned whether there was scope for the Panel to consider the matter. They pointed out that HNZC approached the Panel for additional areas to be notified (that did not include these two areas), and this was acceded to and, in due course, notified. The Council took the view that there was a risk that people potentially affected by the proposal could be denied an effective opportunity to participate in the plan change process.

[130] The parties were in agreement that the case offering the most assistance was that of Kós J in *Palmerston North City Council v Motor Machinists Limited*.⁷³ In that decision Kós J endorsed the two-step approach taken by William Young J in *Clearwater Resort Limited v Christchurch City Council*.⁷⁴ There, the Judge stated:⁷⁵

On my preferred approach:-

1. A submission can only fairly be regarded as “on” a variation if it is addressed to the extent to which the variation changes the pre-existing status quo.
2. But if the effect of regarding a submission as “on” a variation would be to permit a planning instrument to be appreciably amended without real opportunity for participation by those potentially affected, this is a powerful

⁷² Memorandum of counsel for the Council, 28 July 2016.

⁷³ *Palmerston North City Council v Motor Machinists Limited* [2013] NZHC 1290.

⁷⁴ *Clearwater Resort Limited v Christchurch City Council* HC Christchurch AP34/02, 14 March 2003.

⁷⁵ At [66].

consideration against any argument that the submission is truly “on” the variation.

[131] Kós J elaborated on this by suggesting questions that may assist in determining the issue:⁷⁶

- (i) whether the submission raised matters that should have been addressed in the s 32 evaluation (if so then it is not likely to fall within the ambit of the plan change); and
- (ii) whether the management regime for a particular resource (here, a specific lot) is altered by the plan change. If it is not then a submission seeking a new management regime may not be “on” the plan change.

[132] Although the s 32 report specifically listed the sites for evaluation as notified, HNZN submitted that the assessment carried out is equally relevant to some areas directly adjacent to the notified areas, in that:⁷⁷

- (a) Meet the locational criteria set out in Policy 14.1.1.2(a) and (b);
- (b) Are incidental extensions of zoning; and
- (c) Would not require substantial changes to the section 32 evaluation.

[133] HNZN then referred again to *Motor Machinists*, and Kós J’s statement:⁷⁸

... the Clearwater approach does not exclude altogether zoning extension by submission. Incidental or consequential extensions of zoning changes proposed in a plan change are permissible, provided that no substantial further s 32 analysis is required to inform affected persons of the comparative merits of that change.

[134] We agree with the HNZN submission that the small increase of the RMD zoning covering HNZN properties in Linwood and Hornby would not require substantial further analysis to inform the merits of the change. We are satisfied the contents of the s 32 report apply equally to these HNZN sites which meet all criteria in Policy 14.1.1.2.

⁷⁶ *Motor Machinists* at [81].

⁷⁷ Supplementary closing submissions for HNZN at 11.

⁷⁸ At [81].

[135] We note that the land is immediately adjacent to the notified areas and meet the locational requirements of Policy 14.1.1.2. We are satisfied that this meets the first limb of the test as it addresses the extent to which the pCRDP changes the status quo.

[136] Further, in *Motor Machinists*, Kós J stated:⁷⁹

Plainly, there is less risk of offending the second limb in the event that the further zoning change is merely consequential or incidental...

[137] HNZN submitted that the inclusion of these two small HNZN sites was consequential and incidental. It also noted that there was significant media coverage of RMD hearings, including the front page of the Press for two consecutive days, and also that the Panel has, without exception, accepted late submissions to accommodate the process of this Plan.

[138] HNZN said it was important to address concerns of scope and context. It had already submitted that, under the *Motor Machinists* principles, the matters were within scope, but went on to note that the OIC does not limit the Panel to the notified proposal, and submissions received in terms of the scope of the decision it may make. The OIC allows us to make changes to a proposal that we consider appropriate, unless it is outside the scope of the proposal “in a material way”.⁸⁰ HNZN submitted that the small additional areas could not be said to be outside scope “in a material way”.

[139] For the purpose of rezoning the sites in Hornby that were the subject of Mr Harrison’s submission, although he did not file closing submissions, we consider that the same legal tests apply to that land.

[140] We are satisfied that matters we have decided regarding additional zoning are within scope. Even if they were not, we are satisfied that they are not outside the scope of the notified proposal “in a material way”.

⁷⁹ At [83].

⁸⁰ OIC, cl 13(4).

SECTION 32AA EVALUATION

[141] Except where we have made amendments to the notified proposal after the consideration of evidence that we heard, we consider that the s 32 material and report provided by the Council was sound. We have considered the costs and associated benefits arising from the provision of additional areas, in particular the evidence of Messrs Blake and Osborne. We have had due regard to the efficiency and effectiveness of rezoning additional areas to Residential Medium Density, in particular in relation to achievement of intensification targets as set out in the Higher Order Documents and Strategic Objectives.

[142] We find that the zoning of areas identified in our decision as RMD is the most appropriate for achieving the objectives of the Plan, in particular Strategic Objectives 3.3.1, 3.3.4 and 3.3.7. In addition, the areas are appropriate given the uncontested policies of the plan, in particular Policies 14.1.1.2 and 14.1.4.2.

[143] In relation to the application of rules providing for a lower height limit in upzoned areas, and the ability to increase that from 8 metres to 11 metres where certain criteria are met, we adopt the evaluation set out in Decision 31 at [9]–[18].

[144] We are satisfied that the provisions are appropriate given our duties under s 32AA, and properly give effect to the Higher Order Documents.

CONCLUSION AND DIRECTIONS

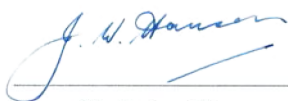
[145] In reaching our conclusion to add further Residential Medium Density areas as set out in Schedule 1, we have considered all submissions and further submissions made on the proposal, and taken into account the further legal submissions of the Council, the Crown and HNZC and the matters traversed at the further hearing. Based on our evidential findings set out in this decision, we are satisfied that the additional areas are the most appropriate for achieving the objectives of the CRDP and Higher Order Documents, and are best suited to enable the recovery of greater Christchurch.

[146] We will issue a separate decision with the planning maps.

[147] We direct the Council as follows:

- (a) The Council is to amend the planning maps in the manner set out in Schedule 1, and file the maps with the Independent Secretariat by *5 p.m., 21 September 2016*.
- (b) Any application for minor corrections is to be made within 10 working days from the date of this decision.

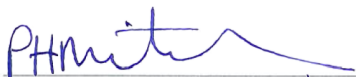
For the Hearings Panel:



Hon Sir John Hansen
Chair



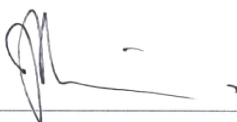
Environment Judge John Hassan
Deputy Chair



Dr Phil Mitchell
Panel Member



Ms Sarah Dawson
Panel Member



Ms Jane Huria
Panel Member

SCHEDULE 1**Decision on zoning**

Map	Description	Notified zoning in additional proposal	Decision on zoning	Submitters
24	Area described as South Papanui	Residential Medium Density	Retain zoning as notified in Residential Stage 1 – Residential Suburban Density Transition in areas bordering St James Park, and Residential Suburban for the remaining sites.	
	Areas described as North Papanui	Residential Medium Density	Residential Medium Density	
32, 33, 39, 40	Area described as Linwood	Residential Medium Density	Residential Medium Density	
	Additional sites sought to be zoned at 75, 77, 77A, 77B, 77C and 79 Mackworth Street, Linwood	n/a	Revisit zoning in Decision 10 and rezone from Residential Suburban Density Transition to Residential Medium Density	RMD126: Housing New Zealand Corporation
36, 37	Areas described as southeast Hornby	Residential Medium Density	Residential Medium Density, except those sites with frontage onto Blankney Street, which retain the zoning as notified in Residential Stage 1 – Residential Suburban	
	Areas described as northwest and west Hornby	Residential Medium Density	Residential Medium Density, except those sites identified on the west side of Parker Street and on Foremans Road and Steele Street; and those sites identified on Moffett Street and the western side of Gilberthorpes Road which retain the zoning as notified in Stage 1 – Residential Suburban.	
	36, 38, 40, 42, 44, 46, 48, 50, 52 and 56 Brynley Street, Hornby	n/a	Revisit zoning in Decision 10 and rezone from Residential Suburban to Residential Medium Density	RMD10: Harrison
	23, 25, 27, and 29 Amuri Street, and 24, 26, 28, 30, 32, 34, 34A, 36, 38, 40, 42, 44, 46, 48, 50, 50A and 52 Gilberthorpes Road, Hornby	n/a	Revisit zoning in Decision 10 and rezone from Residential Suburban to Residential Medium Density	RMD126: Housing New Zealand Corporation

SCHEDULE 2

Table of submitters heard

This list has been prepared from the index of appearances recorded in the transcript, and from the evidence and submitter statements shown on the Independent Hearing Panel's website.

Submitter Name	No.	Person	Expertise or role if witness	Filed/Appeared
Christchurch City Council		W Blake	Valuer	Filed/Appeared
		TJ Wright	Transport engineer	Filed
		BM O'Brien	Planning engineer	Filed
		E Jolly	Urban designer	Filed/Appeared
		RB Norton	Planning engineer	Filed/Appeared
		JFJ Schroder	Urban designer	Filed/Appeared
		S Oliver	Planner	Filed/Appeared
Housing New Zealand Corporation	RMD126 RMD-FS1	SAL Styles	Planner	Filed/Appeared
		PM Osborne	Economist	Filed/Appeared
		JM Rennie	Urban designer	Filed/Appeared
Robert Perry	RMD17	RJ Perry		Filed/Appeared
		RS Paton		Filed/Appeared
AT&BI Peddie Family Trust	RMD53	B Peddie		Appeared
Shirley/Papanui Community Board	RMD61	M Davidson		Filed/Appeared
Ross Houliston	RMD63	R Houliston		Filed/Appeared
Graeme Keeley	RMD70	GM Keeley		Filed/Appeared
E A McIver-Keeley	RMD71	EA McIver-Keeley		Filed
Cath Christie	RMD76	C Christie		Filed
Gina Beecroft	RMD78	G Beecroft		Filed
		L Penno		Appeared
Rory & Susan Dawber	RMD82	S and R Dawber		Filed
		A and G Hall		Filed
		K M Liddell		Filed/Appeared
Christopher Winefield & Phillipa Tucker	RMD89	PK Tucker		Filed/Appeared
		CS Winefield		Filed
		Dr M Williams		Filed/Appeared
Christian Jordan	RMD-91	C Jordan		Appeared
Rebecca Brinkhurst	RMD-94	R Brinkhurst		Filed
Hagley Ferrymead Community Board	RMD-104	S Templeton		Filed
		J Davies		Appeared
Stephen & Mary Connor	RMD-112	S Connor		Filed
P M Falentanoai	RMD-124	PM Faletanoai		Filed/Appeared
Margaret Howley	RMD-130	MA Howley		Filed/Appeared
K N Hampton	RMD-FS29	KN Hampton		Appeared
Camilla Cockerton	RMD-FS31	Dr C Cockerton		Appeared

Details of submitter No: 814 - Jo Appleyard

Submitter:	Jo Appleyard
Submitter Address:	Level 5, PwC Centre 60 Cashel Street , New Zealand, 8140
Organisation:	Carter Group Limited
Behalf of:	Carter Group Limited

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 16/05/2023

First name: Jo

Last name: Appleyard

Organisation: Carter Group Limited

Preferred method of contact

Postal address:

Email:

Daytime Phone:

Would you like to present your submission in person at a hearing?

☐ Yes

Additional requirements for hearing:

Person of interest declaration: I am

*

Explain the grounds for saying you come within category (a) or (b) above:

Note to person making further submission:

- A further submission can only support or oppose an original submission listed in the summary. It is not an opportunity to make a fresh submission on matters not raised in the submission.
- A copy of your further submission must be served on the original submitter within 5 working days of making the further submission to the Council

Attached Documents

Name
PC14 Submission - Carter Group Limited 3463-6014-0323

Form 5

**SUBMISSION ON PUBLICLY NOTIFIED PROPOSAL FOR POLICY STATEMENT OR
PLAN, CHANGE OR VARIATION**

Clause 6 of Schedule 1, Resource Management Act 1991

To Christchurch City Council

Name of submitter: Carter Group Limited (*Carter Group*)

- 1 This is a submission on the proposed plan change 14 (*PC14*) to the Christchurch District Plan (the *District Plan*).
- 2 Carter Group could not gain an advantage in trade competition through this submission.
- 3 Carter Group's submission relates to the whole of PC14. The specific relief sought by Carter Group is set out at **Appendix 1** and the key points elaborated on below.
- 4 Carter Group wishes to be heard in support of the submission.
- 5 If others make a similar submission, Carter Group will consider presenting a joint case with them at a hearing.

PROPOSED CHANGES TO THE RESIDENTIAL ZONE CHAPTERS

- 6 By way of general feedback, Carter Group considers that PC14 fails to enable intensification, residential activity and building heights in the manner envisaged by the NPS-UD and Resource Management Act 1991.
- 7 More specifically, to the extent that greater provision for building heights and/or residential activity has been provided for throughout the City by way of the proposed changes, this is countered by the corresponding amendments to policy provisions, rules, activity status, and assessment matters which have the effect of introducing greater time, cost and uncertainty to projects.
- 8 In Carter Group's views, such changes undermine the intensification sought by the RMA and NPS-UD and they are not otherwise necessary or appropriate to promote intensification in a manner consistent with the stated purpose of PC14. Moreover, such changes are inconsistent with strategic directions in Chapter 3, and objective 3.3.2 in particular which requires (with our emphasis):

3.3.2 Objective - Clarity of language and efficiency

a. The District Plan, through its preparation, change, interpretation and implementation:

i. Minimises:

A. transaction costs and reliance on resource consent processes; and

B. the number, extent, and prescriptiveness of development controls and design standards in the rules, in order to encourage innovation and choice; and

C. the requirements for notification and written approval; and

ii. Sets objectives and policies that clearly state the outcomes intended; and

iii. Uses clear, concise language so that the District Plan is easy to understand and use.

- 9 In simple terms, the additional regulatory controls proposed are not enabling.
- 10 In Carter Group's views, greater use should be made of permitted or controlled activity status; and caution should be exercised in the drafting of policies and assessment criteria to ensure such provisions are clear, certain and are ultimately enabling and supportive of intensification.

PROPOSED CHANGES TO THE COMMERCIAL ZONE CHAPTER

- 11 In general terms, the proposed changes to commercial zones fail to 'enable' intensification in the manner envisaged by the NPS-UD, and policy 3 especially. Again, such changes are also inconsistent with strategic objective 3.3.2.
- 12 To the extent that intensification is provided for by PC14 (e.g. increased building heights), this is countered by the corresponding amendments to policy provisions, rules, activity status, and assessment matters which have the effect of 'disenabling' or further constraining development and adding time, cost and uncertainty to projects.
- 13 Such changes undermine the intensification sought by the NPS-UD and they are not otherwise necessary or appropriate to promote intensification in a manner consistent with the stated purpose of PC14.
- 14 In simple terms, the additional regulatory controls proposed are not enabling.
- 15 In Carter Group's views, greater use should be made of permitted or controlled activity status; and caution should be exercised in the drafting of policies and assessment criteria to ensure such provisions are clear, certain and are ultimately enabling and supportive of intensification.

Avonhead mall

- 16 Given the extent of intensification provided for in the residential catchment surrounding Avonhead Mall and the absence of other commercial centres and

activity in this catchment, a corresponding level of intensification at Avonhead mall is appropriate.

- 17 Such intensification could occur without escalating the status of Avonhead in the commercial centres hierarchy (to a TCZ) by reclassifying the centre as a Local Centre (large) rather than Local Centre (small). Carter Group seek that Avonhead mall is recognised as a Local Centre (large).

QUALIFYING MATTERS

- 18 Firstly, Carter Group considers that the introduction of a number of the qualifying matters in PC14 as notified is legally wrong, and falls outside of the scope of what is allowed under the RMA to be included in an intensification planning instrument like PC14:

- 18.1 Section 77I of the RMA only grants Council's the power to impose qualifying matters over 'relevant residential zones'. A number of qualifying matters have been identified over zones which are not 'relevant residential zones', including industrial, specific purpose, open space, and rural zones.

- 18.2 Section 77O of the RMA grants Council's the power to impose qualifying matters over urban non-residential zones only to the extent necessary to accommodate a qualifying matter.

- 18.3 A recent Environment Court¹ case has considered the issue of qualifying matters and found that these must only relate to making the intensified density standards themselves less enabling. It is not a mechanism that enables further constraint to the status quo. Such an amendment to the District Plan would be ultra vires.

- 19 Secondly, Carter Group consider that in a number of cases, PC14 unnecessarily and inappropriately makes building height or density requirements less enabling, where operative provisions in the district plan already adequately accommodate qualifying matters. Those provisions provide scope to evaluate the appropriate height or density of buildings in the context of the qualifying matter and as such, additional regulatory controls or constraints that are less enabling are not necessary or appropriate. For example:

- 19.1 Heritage items and their settings are already addressed by provisions in chapter 9.3 that provide sufficient scope through resource consent processes to constrain building height or density, where that is warranted.

- 19.2 Natural hazards (including Flood hazard management areas, Coastal Hazard Management Areas, Slope instability management areas) are adequately addressed in chapter 5, within a framework that seeks to avoid or manage

¹ *Waikanae Land Company Limited v Heritage New Zealand Pouhere Taonga* [2023] NZEnvC 56.

hazard risks. That framework also provides scope to reduce density where appropriate.

19.3 Waterbody setbacks manage riparian margins and built form, earthworks and other activities in these margins, irrespective of the height or density of development.

- 20 Carter Group also opposes the Low Public Transport Accessibility overlay and qualifying matter as basis for dis-enabling building height or density. To the extent that deficiencies in accessibility to public transport may exist for parts of the City, this can be remedied over time to meet demands, through additional public investment, technological solutions, ride sharing (such as Uber Pool) and other initiatives. In the same way that the built form and density of communities is anticipated to change over time in response to the NPS-UD, it follows that community services and facilities (including public transport) will also change, and on this basis, the current provision of public transport should not hinder density and development capacity over the longer term.

Heritage items and settings

- 21 Carter Group owns land at 32 Armagh Street, known as the former Girls High Site (the *Site*). That land is partly covered by a heritage setting (heritage setting number 287) and includes a heritage item (the 'Blue Cottage' – heritage item number 390). The extent of the Site, and the heritage setting and item are shown below:



Figure 1: Site shown in yellow, approximate location of heritage setting shown in orange, and item location indicated by a red cross.

- 22 The District Plan statement of significance for the building notes, among other things, its historical significance as a c.1875 colonial cottage and its architectural significance due to the 'authenticity of its exterior and retention of some of its original interior detailing'. However, the building is in a poor state of repair with evident damage to its exterior and, as noted in the statement of significance, has had original architectural features removed over time. The heritage setting for the building is of no apparent significance in its own right – constituting a gravelled car park.
- 23 Accounting for these attributes, the building and setting are considered to be of little to no heritage value.
- 24 The scope of PC13 is broad and presents a timely opportunity to review the extent of the schedule of heritage items. Such a review is especially relevant in instances where additional information on individual items has become available following the District Plan Review. The provision of such information is integral to the need to carefully weigh costs and benefits of any proposed regulation (such as scheduling) under s 32 RMA.

25 For the reasons described above, the Blue Cottage's heritage status is considerably diminished and can no longer be considered significant. This building and its setting should no longer be included on the Schedule.

26 Carter Group therefore seeks that:

26.1 The Blue Cottage (Heritage Item 390) be removed from the Schedule of Significant Historic Heritage in Appendix 9.3.7.2 of the District Plan; and

26.2 Associated Heritage Setting 287 be removed from the same.

Proposed residential heritage areas and new rules relating to heritage

27 PC14 identified 11 new heritage areas into the District Plan (which have been proposed through plan change 13 (*PC13*)), with associated objectives, policies and rules. PC14 otherwise introduces a number of new rules for built development in the vicinity of heritage items.

28 Carter Group hold significant concerns over the introduction of these heritage areas and additional heritage related controls in general.

29 In regards heritage areas, the Site is located in the "Inner City West HA6" residential heritage area. As is clear from the figure above, the majority of the Site (and we would argue a large proportion of the heritage area itself) holds no heritage values whatsoever. It is therefore perplexing why these areas have been identified in this new overlay.

30 Carter Group further note that the Heritage Report and Site Record Forms for 'HA6 Inner City West' prepared by Dr Ann McEwan (which forms part of the proposed sub-chapter 9.3 provisions of PC14) records the 32 Armagh Street as a vacant lot with its contribution to the heritage area being 'intrusive'. The Blue Cottage is recorded as being located on 325 Montreal Street with its contribution to the heritage area being 'defining'. However, the proposed Site Contributions Map (also forming part of the proposed sub-chapter 9.3 provisions of PC14) identifies the whole site, including the vacant lot on 32 Armagh Street, as having a 'defining' contribution. This is wrong and internally inconsistent.

31 Carter Group also question the identified contribution of other sites within the "Inner City West HA6" residential heritage area, as the basis for then justifying the identification of a residential heritage area. By way of example, the YMCA Christchurch site occupies a substantial area and is assessed as making a 'defining' contribution to the proposed "Inner City West HA6" residential heritage area, despite featuring modern and partially-constructed multi-level commercial buildings of no apparent heritage merit. Other sites within the heritage area are also of questionable merit in terms of their contribution.

32 Carter Group are concerned about these errors, and the risk that errors such as this might be systemic throughout PC14. Given the strict regulations on development PC13 proposes, it is essential to ensure the provisions are accurate and justified. The heritage listings and corresponding rules within the District Plan currently

recognise and provide for the protection of historic heritage from inappropriate subdivision, use and development.

- 33 A number of the proposed heritage areas overlap with character areas already identified in the District Plan. It is not entirely clear why both of these overlays are required to protect historic heritage. The addition of a residential heritage area overlay will add unnecessary complexity and duplication in the interpretation of the District Plan.
- 34 Carter Group note that through the hearings on the proposed Christchurch District Plan, the Independent Hearings Panel determined that there was no basis to retain rules controlling development on sites adjacent to heritage items or settings in order to satisfy section 6(f) of the RMA. For the same reasons, it follows that the proposed provisions for Residential Heritage Areas, and the related 'Interface Sites' is not warranted. Similarly, there is no basis to impose more restrictive rules or less enabling built form standards on sites that adjoin or are in the vicinity of heritage items.
- 35 The Site's identification within a heritage area and the imposition of additional heritage-related rules or controls on development (beyond those otherwise set out in Chapter 9) is strongly opposed by the Carter Group, who seek that:
 - 35.1 the heritage areas in general (maps and associated provisions) are deleted; or
 - 35.2 the proposed "Inner City West HA6" residential heritage area is removed from PC14; or
 - 35.3 at the very least, the Site be removed from the proposed "Inner City West HA6" residential heritage area; and
 - 35.4 all heritage related rules or constraints on built form, that do not relate to listed heritage items and settings and which are not otherwise contained within sub-chapter 9.3 are deleted.

Significant and other trees

- 36 The Site already contains listed individual significant trees (T12 and T13) in the District Plan. The District Plan already provides a set of provisions for the protection of such trees.
- 37 PC14 proposes to introduce trees identified as 'qualifying matters'. It is understood that for a tree to be a 'qualifying matter' it must be assessed at over 100 years in age. It is not clear why this is also required in addition to its original listing in the District Plan. These provisions are not efficient or effective and the operative provisions managing development in the vicinity of listed trees are considered appropriate, effective and efficient.
- 38 T12 has been identified as a 'qualifying matter' tree. The assessment included in the section 32 report is brief and does not justify the inclusion of this tree as a

qualifying matter tree. Qualifying matters, given their restrictions on development rights of private property, should be thoroughly tested and assessed.

- 39 Carter Group also opposes the identification of two scheduled trees on the Site. Carter Group do not agree that the trees are of such significance as to warrant their listing and protection, particularly given that their retention significantly constrain the development capacity of the site. In Carter Group's views, these significant costs outweigh any benefits of scheduling. The listing of the 2 scheduled trees at 32 Armagh Street is inappropriate and should be deleted.

The New Regent Street heritage setting

- 40 Carter Group oppose the extent of the heritage setting for New Regent Street (being heritage setting 336 associated with heritage item 404 in Appendix 9.3.7.2 schedule).
- 41 Carter Group oppose the identification of this heritage setting to the northern most edge of Armagh Street and consider the setting should end at the southern most edge of Armagh Street, being where New Regent Street meets Armagh Street. Among other reasons, Carter Group consider that the modern buildings fronting Armagh Street at either end of New Regent Street or the Armagh Street road reserve have no apparent heritage values that warrant a heritage setting.
- 42 There is no basis for why this heritage setting extends as far as it does.

Central City Heritage Interface

- 43 Carter Group have interests in the land bounded by Oxford Terrace, Manchester Street, Armagh Street, and Colombo Street as shown below:



Figure 2: Approximate outline of site shown in yellow

- 44 Part of this site is subject to the proposed 'Central City Heritage Interface' overlay. This overlay is strongly opposed by the Carter Group. Carter Group considers there is no basis or justification for such an overlay over the Site. Among other reasons, Carter Group notes that the site has no identified heritage values and is surrounded by roads, that provide an adequate interface to and separation from other sites in the area, including those which may have heritage value.
- 45 It is also unclear why there are no objectives or policies introduced by PC14 into the Heritage Chapter of the plan in respect of these heritage interface sites. This gives very little direction to plan users as to their utility and/or relevance.
- 46 On this basis, Carter Group therefore seek:
- 46.1 the heritage interface overlays in general (maps and any associated provisions) are removed from PC13; or
 - 46.2 the Central City Heritage Interface relating to New Regent Street is removed; or
 - 46.3 at the very least, the Central City Heritage Interface is removed from the above site; and
 - 46.4 all heritage related rules or constraints on built form, that do not relate to listed heritage items and settings and which are not otherwise contained within sub-chapter 9.3 are deleted.

Tsunami Management Area

- 47 Carter Group opposes the introduction of the Tsunami Management Area (*TMA*) as notified in PC14 as a qualifying matter and seeks that these provisions be deleted in their entirety.
- 48 Carter Group consider the extent of the overlay is excessive and not appropriately commensurate with risk. The TMA appears to be based off a 2019 report by NIWA (the *NIWA Report*) 1 in 500 year tsunami event with 1.06m² sea level rise by 2120. This modelled scenario is too conservative in light of the serious development restrictions the overlay places on private property.
- 49 Carter Group are not aware of any other tier 1 local authority using a 1:500 year tsunami risk as a qualifying matter. The modelled scenario is inconsistent with the standard coastal risk approaches throughout the country:

Canterbury Regional Policy Statement

- 49.1 In the Canterbury Regional Policy Statement (*CRPS*) 'high hazard areas' (albeit they do not relate to tsunami's but rather coastal inundation and erosion) at (1) also refers to a 1:500 year event for flooding (being the equivalent of 0.2%AEP) where depths are greater than one metre.

² We note that the section 32 report incorrectly records this as being 1.6m at [6.16.2].

- 49.2 From our review of the NIWA Report, it appears the TMA notified includes all areas where inundation might occur from the tsunami scenario, where that is greater than 0m. In other words, land has been included in the TMA where depth will be far less than one metre in a 1:500 year event. It is difficult to see how the TMA is being justified in these areas.
- 49.3 Given the purpose of the TMA is to mitigate risk to life of people in the event of a tsunami, consideration should have been given to at which point that risk materialises. It is not appropriate to simply take the area from the NIWA report and convert this into an overlay without analysing the appropriateness of its extent any further.

The Greater Christchurch Partnership

- 49.4 The proposed TMA is larger than the Tsunami Inundation area identified by the Greater Christchurch Partnership as part of its consultation on the Greater Christchurch Spatial Plan (the *draft Spatial Plan*). The draft Spatial Plan maps include a map showing the Canterbury Coastal Natural Hazards. It is not clear why the TMA has not been mapped in a manner consistent with this map.

The tsunami evacuation area

- 49.5 The TMA is also similar to the Canterbury Tsunami Evacuation Zones. The commentary to these zones is as follows:

"Tsunami evacuation zones are areas that we recommend people evacuate from as a precaution after they feel a long or strong earthquake, or in an official tsunami advisory or warning. They encompass many different possible tsunami scenarios.

The area that would be flooded in any particular tsunami depends on many factors, including:

- the size of the earthquake*
- precisely how the earthquake fault moved*
- the direction the tsunami is coming from*
- the tide level when the largest waves arrive.*

Every tsunami will be different and we can never say for sure exactly which areas within a zone will be flooded. There is no one tsunami that would flood an entire zone.

We consider many different tsunami scenario models when drawing the tsunami evacuation zones. The inland boundary of the zones is based on several 'worst-case' scenarios – very rare tsunamis that we might expect once every 2500 years."

[emphasis added]

49.6 Environment Canterbury themselves recognise that:³

"... the tsunami evacuation zones are not appropriate for property-specific land use planning. Land use planning considers the sustainability of development in an area as well as life safety and wellbeing issues, whereas tsunami evacuation zones are fundamentally about life safety. For this reason, as explained above, the zones are generally conservative, and the yellow zone in particular represents an extreme event that we would only expect in the order of every 2500 years, which is beyond most land use planning time frames."

[emphasis added]

49.7 This further demonstrates the inappropriately conservative nature of the TMA.

The NIWA Report

49.8 The NIWA Report on which the TMA is based also recognises that the maps are highly conservative and caveats many of its own findings:

"Maps of the inundation extents should not be used at scales finer than 1:25,000. The overview maps are intended as a guide only and should not be used for interpreting inundation."

49.9 It is further noted the report was prepared with the intention of informing the Land drainage recovery program, and not specifically for the purposes of being applied as a qualifying matter to restrict development.

50 The costs of imposing such strict restrictions on development over such a conservative area significantly outweighs the benefits of reducing the risk of harm to people. Risk and development constraints need to be proportionate and appropriate.

51 Carter Group seeks that the TMA, and related provisions, be deleted in their entirety.

FINANCIAL CONTRIBUTIONS POLICY

52 The proposed tree canopy cover and financial contributions provisions are unworkable and unreasonable.

53 The provisions are difficult to understand and create considerable uncertainty. For example:

53.1 If trees are retained over and above the 20% cover threshold will a financial credit be provided to the applicant?

³ Review of tsunami evacuation zones for Christchurch City, Report No. R19/125, prepared by Helen Jack dated November 2019.

- 53.2 It is not clear who would be qualified to undertake the assessment of the canopy cover.
- 53.3 The proposed definitions of PC14 introduce the definition of a 'hedge' with specific reference to the tree canopy cover and financial contributions provisions, yet those provisions do not utilise that term.
- 53.4 If a stormwater basin is heavily planted in native shrubs, should this receive a credit as plants (and not just trees) also provide for carbon sequestration?
- 53.5 How will the timing of assessment work in relation to consenting processes? For greenfield subdivisions for example, landscape plans are often not completed until after resource consent is issued.
- 54 The canopy cover provisions would be difficult to enforce. If canopy cover is determined as acceptable at the time of resource consent and 10 years or 15 years later one or some of those trees are cut down, who monitors and enforces that requirement? Does Council have the staff resources to maintain that level of monitoring across wide swathes of the city?
- 55 Councils increasingly seek a reduction in reserve areas within greenfield subdivisions, on the basis of ongoing maintenance costs for the Council. It would be very difficult to achieve a 20% of net site area coverage in most greenfield subdivisions, noting that those reserve areas are also required for other purposes such as playground and open grass for play areas, that are incompatible with extensive tree canopy cover.
- 56 The provisions require 20% of the net site area adjacent to road corridors to contain tree cover. Accommodating tree cover typically necessitates wider road corridors. Wider road corridors reduces land available for housing, in direct conflict with the existing District Plan provisions stipulating a minimum density of 15 hh/ha must be achieved for greenfield subdivision areas, and more generally the NPS-UD.
- 57 The cost implications of not achieving tree cover are considerable and, given Carter Group does not consider the 20% cover is achievable, will add further to development costs that are then passed onto purchasers.
- 58 The implications of this proposed policy are significant from an economic perspective and must be adequately justified by the Council. As it stands, Carter Group do not consider the Council has done this and therefore the proposed financial contributions policy should be deleted in its entirety.

THE ZONING OF PARTICULAR SITES

- 59 Carter Group has interests at 332 Oxford Terrace, being the former Star and Garter Hotel site which was previously recognised in the Christchurch City Plan, by way of scheduling. The site has never had residential activity on it, it has remained undeveloped since the late 1990's and is likely to remain vacant pending an economically viable and efficient development opportunity for the land.

- 60 Whilst residential development in some form is likely for the site, provision for complementary commercial activities (food and beverage activities, small scale retail activity, community activity, etc at ground floor level) is desirable in order to support residents on the site and in the surrounding area and activate the site's three road frontages.
- 61 Accordingly, a mixed use zoning is necessary in order to facilitate mixed use development entailing residential and other activity, which would otherwise be precluded or highly uncertain under the proposed High Density Residential Zoning.
- 62 Accounting for the above, Carter Group consider Commercial Central City Mixed Use zoning is appropriate for the site and this should be amended on the planning maps.

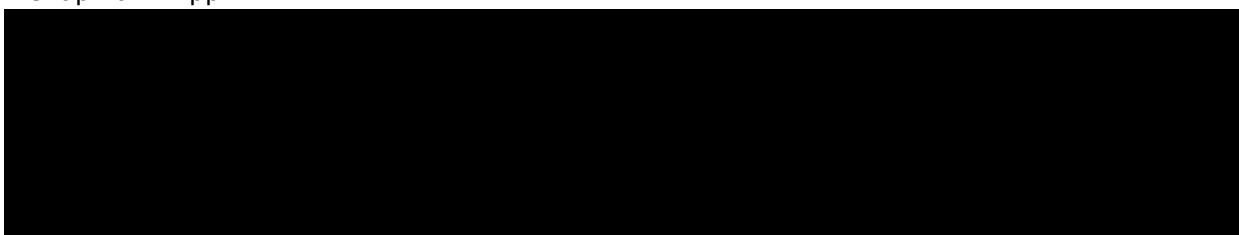
Signed for and on behalf of Carter Group Limited by its solicitors and authorised agents
Chapman Tripp



Jo Appleyard
Partner
12 May 2023

Address for service of submitter:

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APPENDIX 1

No.	Provision	Position	Submission	Relief Sought
Chapter 1 Introduction				
1.	General feedback – 1.3.4.2	Neutral	PC14 proposes explanatory text regarding the potential infrastructure constraints for development that is enabled by the District Plan and PC14. The submitter considers this text is ultimately helpful to readers of the District Plan but is concerned at this possibility eventuating.	Retain as notified

No.	Provision	Position	Submission	Relief Sought
Chapter 2 Abbreviations and definitions				
1.	Definition - Accessory building	Oppose	<p>PC14 unnecessarily provides a distinct definition of this term for the Medium Density Residential and High Density Residential zones. This will provide conflict between zones, confusion to users of the plan, and unintended consequences including a likelihood of unnecessary and costly resource consent applications.</p> <p>For example, attached accessory buildings may require consent where they would otherwise be permitted in other zones (e.g. attached garages, solar heating devices, etc).</p>	Retain status quo.

No.	Provision	Position	Submission	Relief Sought
2.	Definition of 'Alteration'	Oppose	The definition has the effect of meaning that any change, modification or addition to a heritage item, heritage setting or heritage fabric, or a building in a heritage area will constitute an 'alteration' and trigger corresponding rules and consent requirements, irrespective of whether it impacts on heritage fabric. This will create unnecessary, costly and inefficient consent requirements, and provide no benefits in respect of heritage.	Retain status quo.
3.	Definition - Building	Oppose	PC14 unnecessarily provides a distinct definition of this term for the Medium Density Residential and High Density Residential zones. This will provide conflict between zones, confusion to users of the plan, and unintended consequences including a likelihood of unnecessary and costly resource consent applications (e.g. for swimming pools, decks, balconies, etc).	Retain status quo.
4.	Definition - Building Base	Oppose	This definition is opposed to the extent that it relates to the constraint of building heights, in a manner that is inconsistent with the NPS-UD and is not otherwise necessary or appropriate for the purposes of promoting intensification.	Delete

No.	Provision	Position	Submission	Relief Sought
5.	Definition - Building Tower	Oppose	This definition is opposed to the extent that it relates to the constraint of building heights, in a manner that is inconsistent with the NPS-UD and is not otherwise necessary or appropriate for the purposes of promoting intensification.	Delete
6.	Definition - Building Coverage	Oppose in part	The definition refers to 'building footprint' however that term is not coloured/underlined so as to refer to the corresponding definition.	Amend such that the term 'building footprint' is marked with reference to the corresponding definition of this term.
7.	Definition - Building Footprint	Oppose in part	The definition is not clear, insofar that it refers to refers to 'any section of any of those buildings that extends out beyond the ground floor level limits of the building and overhangs the ground'.	Amend to provide greater clarity.
8.	Definition of 'Contributory building'	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Regardless, the proposed definition is vague and provides little certainty as to whether buildings would or would not constitute a contributory building.	Delete.
9.	Definition – Coverage	Oppose	PC14 unnecessarily provides a distinct definition of this term for the Medium Density Residential and High Density Residential zones. This will provide conflict	Retain status quo.

No.	Provision	Position	Submission	Relief Sought
			between zones, confusion to users of the plan, and unintended consequences including a likelihood of unnecessary and costly resource consent applications.	
10.	Definition of 'Defining building'	Oppose	<p>Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission.</p> <p>Regardless, the proposed definition is vague and provides little certainty as to whether buildings would or would not constitute a defining building.</p>	Delete.
11.	Definition of 'Demolition'	Oppose	The amended definition has the effect of meaning that any destruction of a non-substantial part of a building constitutes 'demolition' and triggers corresponding rules and consent requirements. This will create unnecessary, costly and inefficient consent requirements for inconsequential partial demolition work, create conflict with the definition of 'alteration', and provide no benefits in respect of heritage.	Retain status quo.
12.	Definition – Development site	Support	The proposed definition sensibly enables sites to be defined and assessed for the purposes of compliance, notwithstanding that they may not fall within the mandatory definition of 'site' under the National Planning Standards.	Retain as notified.

No.	Provision	Position	Submission	Relief Sought
13.	Definition – Dripline	Oppose	This definition is deleted, evidently, on the basis that it will be replaced by a new definition of 'Tree protection zone radius'. The dripline definition is preferred on the basis that it is more readily understood.	Retain status quo.
14.	Definition – Fine grain	Oppose	The definition is highly subjective, lacks clarity and specificity, and is open to conflicting interpretation.	Delete.
15.	Definition – Ground level	Oppose	PC14 unnecessarily provides a distinct definition of this term for the Medium Density Residential and High Density Residential zones. This will provide conflict between zones, confusion to users of the plan, and unintended consequences including a likelihood of unnecessary and costly resource consent applications.	Retain status quo.
16.	Definition – Gust Equivalent Mean (GEM)	Oppose	The definition is highly subjective, lacks clarity and specificity, and is open to conflicting interpretation.	Delete.
17.	Definition – Habitable room	Oppose	The definition is highly subjective, lacks clarity and specificity, and is open to conflicting interpretation insofar that it refers to 'a similarly occupied room'.	Delete.

No.	Provision	Position	Submission	Relief Sought
18.	Definition – Heat island	Oppose	The definition is highly subjective, lacks clarity and specificity, and is open to conflicting interpretation.	Delete.
19.	Definition – Hedge	Oppose	The definition is highly subjective, lacks clarity and specificity, and is open to conflicting interpretation.	Delete.
20.	Definition – Height	Oppose	PC14 unnecessarily provides a distinct definition of this term for the Medium Density Residential and High Density Residential zones. This will provide conflict between zones, confusion to users of the plan, and unintended consequences including a likelihood of unnecessary and costly resource consent applications.	Retain status quo.
21.	Definition of 'Heritage setting'	Oppose	The amended definition removes the wording that a setting ' <i>together with the associated heritage item, has met the significance threshold</i> ' and instead states that ' <i>Heritage settings have not been assessed as meeting the significance threshold for scheduling</i> '. The submitter considers that heritage settings that do not meet the significance threshold for scheduling should not be listed, with associated regulatory requirements.	Retain status quo.

No.	Provision	Position	Submission	Relief Sought
22.	Definition of 'Heritage Building Code works'	Supports	The amended definition provides greater clarity and certainty, and sensibly provides for insulation and glazing upgrades.	Retain as proposed.
23.	Definition – Human scale	Oppose	The definition is highly subjective, lacks clarity and specificity, and is open to conflicting interpretation.	Delete
24.	Definition of 'Intrusive building or site'	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Regardless, the proposed definition is vague and provides little certainty as to whether buildings or sites would or would not be intrusive.	Delete.
25.	Definition of 'Neutral building or site'	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Regardless, the proposed definition is vague and provides little certainty as to whether buildings or sites would or would not be categorised as neutral.	Delete.
26.	Definition – Outdoor living space	Support	The definition provides greater clarity and certainty than the status quo.	Retain as notified.

No.	Provision	Position	Submission	Relief Sought
27.	Definition – Pedestrian access	Oppose	The definition (insofar as it refers to a 'dedicated pathway') precludes other forms of pedestrian access or shared spaces that adequately serve the same purpose.	Amend definition as follows: A dedicated pathway that provides access for pedestrians from the street to a residential unit and to any parking area for that residential unit
28.	Definition – Perimeter block development	Oppose	The definition is highly subjective, lacks clarity and specificity, and is open to conflicting interpretation.	Delete
29.	Definition of 'Reconstruction'	Supports	The amended definition provides greater clarity and certainty, and sensibly provides for additional forms of reconstruction.	Retain as proposed.
30.	Definition of 'Relocation'	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. As such, the submitter opposes the definition of relocation insofar that it relates to heritage areas. Further, the submitter opposes the deletion of the exclusions in (a) and (b) that otherwise sensibly exclude temporary relocation or realignment works.	Retain status quo.
31.	Definition of 'Repairs'	Supports	The amended definition provides greater clarity and certainty, and sensibly provides for additional forms of repairs.	Retain as proposed.

No.	Provision	Position	Submission	Relief Sought
32.	Definition – Residential unit	Oppose	PC14 unnecessarily provides a distinct definition of this term for the Medium Density Residential and High Density Residential zones. This will provide conflict between zones, confusion to users of the plan, and unintended consequences including a likelihood of unnecessary and costly resource consent applications.	Retain status quo.
33.	Definition of 'Restoration'	Supports	The amended definition provides greater clarity and certainty.	Retain as proposed.
34.	Definition – Site	Oppose	<p>PC14 unnecessarily provides a distinct definition of this term for the Medium Density Residential and High Density Residential zones. This will provide conflict between zones, confusion to users of the plan, and unintended consequences including a likelihood of unnecessary and costly resource consent applications.</p> <p>As noted above, the submitter supports the definition 'development site' and the use of this term in relevant rules.</p>	Retain status quo.
35.	Definition – Tree	Oppose	The definition is highly subjective, lacks clarity and specificity, and is open to conflicting interpretation.	Delete or alternatively amend to specify a potential height of at least 3m.

No.	Provision	Position	Submission	Relief Sought
			Furthermore, the definition is unreasonably restrictive insofar that it specifies a minimum potential height of 5m.	
36.	Definition – Tree canopy cover	Oppose	The definition is very broad and relies on tree cover achieving expected growth over a 20 year time frame. It is unclear how the Council intends to cover the cost of enforcement over a 20+ year time frame for all new developments.	Delete
37.	Definition – Tree protection zone radius	Oppose	The definition is complex and is open to conflicting interpretation. The definition of 'dripline' is preferred.	Delete

No.	Provision	Position	Submission	Relief Sought
Chapter 3 Strategic Directions				
1.	Clause 3.1(v) Introduction	Support	The additional text appropriately recognises the need to ' <i>Facilitate an increase in the supply of housing, and provide for a wide range of housing types and locations, to give effect to the [relevant statutory] provisions enabling development...</i> '.	Retain as notified.
2.	Objective 3.3.2	Support	The objective is appropriate to ensure the effective and efficient preparation, change,	Retain as notified.

No.	Provision	Position	Submission	Relief Sought
			interpretation and implementation of the District Plan.	
3.	Objective 3.3.7	Oppose	The proposed wording in clauses (a)(i)-(iv) of this objective seeks to define a 'well-functioning urban environment' in a way that does not necessarily reflect, and risks narrowly framing, policy 1 of the NPS-UD. Whilst some aspects of these clauses are appropriate, others are not.	<p>Amend by deleting the test following the words 'into the future' as follows:</p> <p><i>3.3.7 Objective – Well-functioning urban environment</i></p> <p><i>a. A well-functioning urban environment that enables all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future; including by recognising and providing for;</i></p> <p><i>i. Within commercial and residential zones</i></p> <p>...</p> <p><i>iv. The benefits of urban environments that support reductions in greenhouse gas emissions; and are resilient to the current and future effects of climate change.</i></p>
4.	Objective 3.3.8(viii)	Oppose	The proposed wording in clauses (viii) is not consistent with the requirements of NPS-UD policy 1. As worded, the proposed policy may require outcomes that are not practicable and are not required by NPS-UD policy 1.	<p>Amend as follows:</p> <p><i>viii. Has good Improves overall accessibility <u>for all and connectivity (including through opportunities for walking, cycling and public transport)</u> for people between housing, jobs, community services, natural spaces, and open spaces <u>including by way of public or active transport</u>, transport (including opportunities for walking, cycling and public transport) and services; and</i></p>

No.	Provision	Position	Submission	Relief Sought
5.	Objective 3.3.10(ii)(E)	Oppose	<p>Consistent with its submissions on sub chapter 6.10A, the submitter considers the provisions relating to tree canopy cover and financial contributions in their entirety are unworkable and onerous.</p> <p>The submitter further notes, that if the Council are wanting to enhance and grow the City's biodiversity and amenity this should also go hand in hand with Council agreeing to accept larger and more frequent recreational reserve areas. Over the past 5 – 7 years Council have pushed back against numerous developer proposals to increase reserve areas which would assist in meeting these proposed objectives.</p>	Delete.

No.	Provision	Position	Submission	Relief Sought
Chapter 5 Natural Hazards				
1.	Policy 5.2.2.5.1– Managing development in Qualifying Matter Coastal Hazard	Oppose	The requirement in the policy to 'avoid' intensification is inconsistent with objectives 5.2.2.1.1 and 5.2.2.1.2 to avoid unacceptable risk and otherwise manage activities to address natural hazard risks. It is also inconsistent with policy 5.2.2.2.1(e) and (f) which seeks to manage such risks	Delete.

No.	Provision	Position	Submission	Relief Sought
	Management Areas		<p>through the management of filling and building floor levels.</p> <p>Whilst site specific assessments provide a pathway for such development to occur, such a process is costly and uncertain, and equates risk with flood depth (rather than for example, floor level, building resilience, flood water velocity or duration, etc).</p> <p>Accounting for the above, the Coastal Hazard Management Areas should be subject to an equivalent regime to flood management areas, which provides for development (including intensification) as a permitted activity, subject to compliance with specified minimum floor levels.</p>	
2.	Policy 5.2.2.5.2– Managing development within Qualifying Matter Tsunami Management Area	Oppose	Consistent with the reasoning set out in the covering submission, the TMA is unreasonably conservative. Aside from the spatial extent of the TMA being opposed, the ‘avoidance’ directive in the policy is opposed for the same reasons expressed above in regards Policy 5.2.2.5.1.	Delete.
3.	Rules 5.4A	Oppose	For the reasons expressed above in regards Policy 5.2.2.5.1 and Policy 5.2.2.5.2 these rules are considered unreasonable, costly,	Delete.

No.	Provision	Position	Submission	Relief Sought
			inefficient, ineffective, and inappropriate. To the extent that flood hazards or high flood hazards exist, the operative FMA and HFHMA provisions are considered appropriate.	

No.	Provision	Position	Submission	Relief Sought
Chapter 6 General Rules & Procedures, Sub Chapter 6.1A Qualifying Matters				
1.	6.1A.1, Table 1 Qualifying Matters	Oppose	<p>Whilst the rationale for qualifying matters expressed in 6.1A.1(a) and (b) is acknowledged, a number of the matters identified in Table 1 are not warranted, accounting for the relevant matters in sections 77I or 77O.</p> <p>Among other reasons, a number of qualifying matters are considered to be less enabling of development to more than the extent necessary to accommodate the identified qualifying matters; and/or such matters have not been adequately evaluated and justified accounting for the costs imposed and the limitations on development capacity that is otherwise sought by the NPS-UD.</p> <p>The submitter is particularly concerned with qualifying matters relating to:</p>	Delete or otherwise amend Table 1 and the extent of Qualifying Matters in a manner consistent with the relief sought by the submitter on other provisions in PC14.

No.	Provision	Position	Submission	Relief Sought
			<p>(a) Heritage areas, items and their settings – noting the operative District Plan provisions relating to heritage adequately provide for such matters.</p> <p>(b) Natural hazards – noting operative District Plan provisions and the submission points above regarding proposed amendments to chapter 5.</p> <p>(c) Residential zones</p> <p>(d) Commercial zones</p>	

No.	Provision	Position	Submission	Relief Sought
Chapter 6 General Rules & Procedures, Sub Chapter 6.10A Tree Canopy Cover and Financial Contributions				
1.	General/all	Oppose	The provisions in their entirety concerning tree canopy cover and financial contributions (including related definitions and amendments to strategic objectives) are unworkable and onerous.	Delete all of the financial contributions draft provisions in their entirety.
2.	6.10A.1	Oppose	The provision begs the question: If trees are retained over and above the 20% cover threshold will a financial credit be provided to the applicant?	
3.	6.10A.1c	Oppose	Greenfield subdivision does not generally cause the loss of tree canopy cover, there is generally a net gain in	

No.	Provision	Position	Submission	Relief Sought
			<p>canopy cover as such subdivision is typically over open paddocks.</p> <p>Furthermore, Council itself has been responsible for a reduced canopy cover through the adoption of policies of density, road widths, off-sets from infrastructure, reduction in reserves to vest, all based around maintenance obligations and council budgets.</p>	
4.	6.10A.1d	Oppose	<p>There is currently no "Urban Forest Plan" setting out the Council target. Therefore, how is anyone expected to know if this is even realistic?</p> <p>This section also refers to financial contributions to cover the cost of tree pits construction within road corridors. This should exclude Greenfield sites where developers are already required as part of their subdivision consent to include street trees within new road corridors.</p>	
5.	Objective 6.10A.2.1	Oppose	<p>For the reasons expressed in the submission points above, the objective is generally opposed.</p> <p>Otherwise, the objective fails to account for the particular characteristics of residential activity, its location or other contextual matters that may make this objective unachievable or inappropriate. For example, residential activities within multi-level apartment buildings in the core of the Central City could not practicably '[maintain] <i>existing trees and/or</i> [plant] <i>new trees as part of the development</i>', as required by the objective.</p>	

No.	Provision	Position	Submission	Relief Sought
6.	Policy 6.10A.2.1.1	Oppose	For the same reasons expressed in regards Objective 6.10A.2.1 and otherwise noting the practical difficulties of monitoring and enforcing the tree canopy percentages over time, this policy is opposed.	
7.	Policy 6.10A.2.1.2	Oppose	<p>For the same reasons expressed in regards to the submission points above, the policy is opposed.</p> <p>Among other things, the maintenance of required tree canopy is impractical to monitor and enforce and requiring financial contributions from those who do not meet the requirements but not from those who may provide the canopy and subsequently remove it. This policy is inequitable and unworkable.</p>	
8.	Policy 6.10A.2.1.3	Oppose	<p>The requirements for tree planting (in terms of location, soil volume, etc) are unnecessarily and unreasonably prescriptive and remove property owners' reasonable freedom and choice to landscape their properties as they choose. Moreover, such requirements are difficult to monitor and enforce on an ongoing basis (e.g. as new owners or tenants choose to re-landscape) and are unnecessary accounting for the control or discretion in regards to these matters where trees are expressly required through resource consent processes.</p> <p>Consent notices in respect of tree planting are an unreasonable and onerous requirement, and are considered impracticable for enforcing residential landscaping which is commonly and regularly altered to reflect changing needs and preferences over time. Consent notices are likely to be overlooked or ignored,</p>	

No.	Provision	Position	Submission	Relief Sought
			<p>or impose costly and inefficient regulatory processes to retrospectively address landscaping works in breach of consent notices.</p> <p>Policies relating to trees in road reserve are unnecessary, noting that such trees can be adequately managed by Council in its capacity as road controlling authority.</p>	
9.	6.10A.3	Oppose	The provisions in this section are generally opposed. Further, clause (c) is considered unclear, insofar as providing 'guidance' on tree species and other 'requirements' and whether these external documents will essentially be imposed as rules.	
10.	6.10A.4	Oppose	The rules are opposed in their entirety for the reasons expressed above.	
11.	6.10A.4(a)	Oppose	The explanatory note setting out the application of the rules is arbitrary, unclear and open to interpretation. Among other concerns, it requires a judgement of whether subdivision or development is 'able to contain a ground floor residential unit' irrespective of whether that is proposed, commercially viable, or otherwise.	
12.	6.10.A.4.1	Oppose	<p>The rules are opposed in their entirety for the reasons expressed above and noting they are arbitrary, unclear and open to interpretation.</p> <p>Among other concerns, the rules apply to 'any residential development except for extensions or accessory buildings...', which might capture non-built</p>	

No.	Provision	Position	Submission	Relief Sought
			improvements (as residential development), such as hard or soft landscaping works, internal alterations, first floor additions, etc.	
13.	6.10.A.4.2	Oppose	<p>The rules are opposed in their entirety for the reasons expressed above and noting they are arbitrary, unclear and open to interpretation and debate. Aside from the monetary costs imposed by the rule, the administration of the rule imposes significant costs insofar as it requires an independent registered valuation.</p> <p>The rules are clearly in conflict with strategic objective 3.3.2.</p>	
14.	6.10.A.4.2.3	Oppose	<p>Consent notices in respect of tree planting are an unreasonable and onerous requirement, and are considered impracticable for enforcing residential landscaping which is commonly and regularly altered to reflect changing needs and preferences over time.</p> <p>Consent notices are likely to be overlooked or ignored, or impose costly and inefficient regulatory processes to retrospectively address landscaping works in breach of consent notices.</p>	

No.	Provision	Position	Submission	Relief Sought
Chapter 7 Transport				
1.	General/all	Oppose	The proposed provisions in their entirety concerning transport are onerous and	

No.	Provision	Position	Submission	Relief Sought
			unnecessary and are not necessary for the purposes of implementing the NPS-UD or the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021.	Delete the proposed provisions to the Transport Chapter in their entirety.
2.	Policy 7.2.1.2 (xi) High trip generating activities	Oppose	Requiring the reduction of greenhouse gas emissions from vehicular trips associated with all high trip generating activities is not necessary, practicable or appropriate. Requirements for cycle parking and end of trip facilities, removal of minimum parking requirements, and non-statutory measures such as improved walking/cycling/PT facilities otherwise adequately reduce greenhouse gas emissions from vehicular trips.	
3.	Policy 7.2.1.9 Pedestrian Access	Oppose	The requirements of the policy are onerous, subjective and otherwise unnecessary accounting for the existing provisions in the plan concerning pedestrian access and urban design matters. The submitter is also concerned that requiring all pedestrian access to be of a width and grade suitable for all users, may not be appropriate or practicable in all cases.	
4.	Rule 7.4.3.7(b)	Oppose	For the reasons expressed in regards policy 7.2.1.9, the requirements for pedestrian access in this rule are opposed.	

No.	Provision	Position	Submission	Relief Sought
	Access Design			
5.	Rule 7.4.3.7(d) Access Design	Oppose	The requirement for either an audio and visual warning device or visibility splay for all sites on the same side of the road as a major cycle route in all zones, irrespective of the nature of the activity or its vehicle generation is unnecessary and onerous.	
6.	Rule 7.4.3.8 Vehicle Crossings And Rule 7.4.3.13 Co-location of Vehicle Crossings	Oppose	The requirements in 7.4.3.13 (as referred to in rule 7.4.3.8) are unnecessary, onerous and impractical. Among other concerns, the submitter notes that the rule creates a 'first in first served' situation for vehicle crossings which in greenfield residential areas may be problematic where adjoining sites are designed and / or obtain building consent, resource consents and / or vehicle crossing permits at a similar time with no knowledge of adjacent crossing positions.	
7.	Rule 7.4.4.18(a)(v ii) and advice note vii in Table 1 Assessment matters for	Oppose	For the reasons expressed in regards Policy 7.2.1.2 (xi) above, this assessment matter is opposed. Aside from those reasons, the submitter also considers it impractical from a commercial, monitoring and enforcement perspective to require ' <i>measures to be implemented and maintained over the lifetime of the activity</i> '.	

No.	Provision	Position	Submission	Relief Sought
	high trip generators			
8.	Rule 7.4.4.27 Assessment matters for pedestrian access	Oppose	For the reasons expressed in regards Policy 7.2.1.9 and Rule 7.4.3.7(b) above, this assessment matter is opposed.	
9.	Rule 7.4.4.28 Assessment matters for vehicle crossing co location	Oppose	For the reasons expressed in regards Rule 7.4.3.8 above, this assessment matter is opposed.	
10.	Table 7.5.2.1 – Minimum numbers of cycle parks required	Oppose	Increased requirements for cycle parking for social housing and residential units are opposed on the basis that the requirements are prescriptive and inflexible, and any additional cycle parking needs are best determined by the developer accounting for the needs of future residents, or informally provided as required. The proposed amendments will add unnecessary development costs, or onerous consenting requirements and will likely reduce development capacity.	

No.	Provision	Position	Submission	Relief Sought
11.	Table 7.5.3.1 – Minimum numbers of loading spaces required	Oppose	<p>Requirements for on-site loading for residential activities are opposed on the basis that the requirements are prescriptive and inflexible, and any loading needs are best determined by the developer accounting for the needs of future residents, or informally provided as required (including through on-street loading facilities).</p> <p>Requiring on-site loading (where car parking is not otherwise required and loading is not presently required) will reduce development capacity and/or significantly increase the costs of development, accounting for the corresponding requirements for on-site access (and other requirements, such as on site turning, vehicle crossing constraints, etc) to facilitate on site loading. Informal loading, or temporary or permanent loading on-street is more effective, efficient and appropriate.</p> <p>The proposed amendments will otherwise add unnecessary development costs, or onerous consenting requirements.</p>	
12.	Appendix 7.5.7 Access design and gradient	Oppose	<p>The amended requirements for access are unnecessary and will result in unreasonable development costs, reduced development capacity, and/or onerous consenting requirements.</p>	

No.	Provision	Position	Submission	Relief Sought
Chapter 8 Subdivision, Development and Earthworks				
1.	8.1 Introduction	Oppose in part	To the extent that additional wording is proposed that specifically refers to 'development' a definition or further clarification of what this term relates to is necessary. In the absence of such clarification, the term is unclear and open to interpretation	Delete, or provide a definition or explanation of the term 'development'.
2.	8.2.2.2 Policy Allotments	Support	The amendments are pragmatic and support the provision of increased development capacity or alternative forms of housing supply and associated changes in tenure.	Retain.
3.	Policy 8.2.2.7 Urban density	Support	The amendments are pragmatic and support the provision of increased development capacity, whilst sensibly recognising constraints to achievement of minimum yields and other development constraints.	Retain.
4.	Objective 8.2.3 Infrastructure and transport	Support	The objective sensibly provides for engineering solutions that do not affect the 'existing' capacity of the wastewater system, without prescriptively limiting what those solutions may entail.	Retain.

No.	Provision	Position	Submission	Relief Sought
5.	Policy 8.2.3.1 Infrastructure constraints	Oppose in part	To the extent that additional wording is proposed that specifically refers to 'development' a definition or further clarification of what this term relates to is necessary. In the absence of such clarification, the term is unclear and open to interpretation	Delete, or provide a definition or explanation of the term 'development'.
6.	Policy 8.2.3.2 Availability of infrastructure	Oppose in part	To the extent that additional wording is proposed that specifically refers to 'development' a definition or further clarification of what this term relates to is necessary. In the absence of such clarification, the term is unclear and open to interpretation. Clause (g) is otherwise supported for the same reasons expressed in respect of objective 8.2.3 above.	Delete, or provide a definition or explanation of the term 'development'.
7.	Objective 8.2.6 and policies 8.2.6.1-8.2.6.3 Urban tree canopy cover	Oppose	For the reasons expressed in further detail in the submitter's submissions on subchapter 6.10A, these provisions are opposed in their entirety.	Delete
8.	Rule 8.3.1 (e) and (f)	Oppose	For the reasons expressed in further detail in the submitter's submissions on subchapter	Delete

No.	Provision	Position	Submission	Relief Sought
	Urban tree canopy cover		6.10A, these provisions are opposed in their entirety.	
9.	Rule 8.3.3 (b) financial contributions	Oppose	For the reasons expressed in further detail in the submitter's submissions on subchapter 6.10A, these provisions are opposed in their entirety.	Delete
10.	Rule 8.3.7 consent notice	Oppose	For the reasons expressed in further detail in the submitter's submissions on subchapter 6.10A, these provisions are opposed in their entirety.	Delete
11.	Rule 8.4.1.1 Notification	Support	The amended notification requirements are supported, accounting for the directions in the EHS Act.	Retain as notified.
12.	Rule 8.5	Support	The provisions are generally supported, to the extent that they are consistent with the submitters other submission points.	Retain as notified.
13.	Rule 8.6.1 Table 1 – Minimum net site areas - residential	Oppose in part	<p>Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission.</p> <p>Further, the proposed 450m2 minimum net site area is opposed on the basis that it conflicts with the objectives in the NPS-UD and District Plan to provide for the most intensive and efficient scale and form of development within Central City areas.</p>	Delete.

No.	Provision	Position	Submission	Relief Sought
14.	Rule 8.6.1 Tables 2 – 5 Minimum net site areas – other zones	Support	The amendments proposed to Tables 2-5 are supported.	Retain the changes as proposed to Rule 8.6.1 Tables 2 – 5.
15.	Rule 8.7.12 Tree canopy assessment matters	Oppose	For the reasons expressed in further detail in the submitter's submissions on subchapter 6.10A, these provisions are opposed in their entirety.	Delete.
16.	8.9 Rules- Earthworks	Support	The amended provisions in rule 8.9 are generally appropriate.	Retain as notified.

No.	Provision	Position	Submission	Relief Sought
Chapter 9 Natural and Cultural Heritage, Sub Chapter 9.3 Historic Heritage				
1.	Policy 9.3.2.2.2 Identification, assessment and scheduling of heritage areas	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission.	Delete.

No.	Provision	Position	Submission	Relief Sought
2.	Policy 9.3.2.2.3 - Management of scheduled historic heritage	Oppose	<p>Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission.</p> <p>The amendments to clause (b) of this policy are also opposed. The operative wording within this policy sensibly recognises that Significant (Group 2) heritage items are potentially capable of accommodating a greater degree of change than Highly Significant (Group 1) heritage items.</p>	Retain status quo.
3.	Policy 9.3.2.2.5 Ongoing use of scheduled historic heritage	Oppose	<p>Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, the changes to this policy are opposed.</p>	Retain status quo.
4.	Policy 9.3.2.2.8- Demolition of scheduled historic heritage	Oppose	<p>Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, the changes to clause (a) of this policy are opposed.</p> <p>In addition, the changes to clause (a)(ii) are opposed insofar that they introduce a new 'test' for evaluating the demolition of historic heritage that presents an unreasonable and inappropriate threshold that materially changes and undermines the policy. By way</p>	Retain status quo.

No.	Provision	Position	Submission	Relief Sought
			of example, the proposed wording may preclude the demolition of heritage items that are significantly (physically) compromised, on the basis of one or more (non-physical) heritage values (e.g. historical/social or cultural/spiritual value) remaining.	
5.	Rule 9.3.3 How to interpret and apply the rules	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, the changes to this rule, insofar that they relate to heritage areas are opposed.	Delete all references to heritage areas.
6.	9.3.4 Rules-Historic heritage	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, changes to this rule, insofar as they relate to heritage areas are opposed.	Delete all references to heritage areas within rule 9.3.4, including (and in particular) rules RD6-RD8.
7.	Matters of discretion 9.3.6.1(a)	Oppose	The submitter opposes the deletion of clause (a), given that damage incurred as a result of the Canterbury earthquakes of 2010 and 2011 including the costs of repair and reconstruction, remains a relevant matter for consideration.	Retain status quo for 9.3.6.1(a).
8.	Matters of discretion 9.3.6.1(p)	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated	Delete proposed 9.3.6.1(p).

No.	Provision	Position	Submission	Relief Sought
			in the covering submission. Accordingly, the matters under clause (p) are opposed.	
9.	Matters of discretion 9.3.6.4	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, the matters in rule 9.3.6.4 are opposed.	Delete proposed rule 9.3.6.4.
10.	Matters of discretion 9.3.6.5	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, the matters in rule 9.3.6.5 are opposed.	Delete proposed rule 9.3.6.5.
11.	Matters of discretion 9.3.6.6	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, the matters in rule 9.3.6.6 are opposed.	Delete proposed rule 9.3.6.6.
12.	Appendix 9.3.7.2 Schedule of Significant Historic	Oppose	For the reasons stated in the covering submission, the listing of the item and setting at 32 Armagh Street (and 325 Montreal Street) is inappropriate. Accordingly, this listing should be deleted.	Delete Heritage Item 390 and Heritage Setting 287 regarding 32 Armagh Street from Appendix 9.3.7.2.

No.	Provision	Position	Submission	Relief Sought
	Heritage Items			
13.	Appendix 9.3.7.3 Schedule of Significant Historic Heritage Areas	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, the changes to this schedule are opposed.	Retain status quo.
14.	Appendix 9.3.7.4 Heritage item and heritage setting exemptions	Oppose	The exemptions provided in Appendix 9.3.7.4 are an important tool for incentivising the adaptive reuse and ongoing protection of heritage items. As such, the amendments proposed to this appendix which reduce the extent of exemptions is inconsistent with the Plan's objectives in relation to heritage and section 6 of the Act.	Retain the status quo.
15.	Appendix 9.3.7.7 – Residential Heritage Areas - Aerial Maps	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, Appendix 9.3.7.7 should be deleted.	Delete.
16.	Appendix 9.3.7.8 – Residential Heritage	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated	Delete.

No.	Provision	Position	Submission	Relief Sought
	Areas – Site Contributions Maps		in the covering submission. Accordingly, Appendix 9.3.7.8 should be deleted.	
17.	Appendix 9.3.7.9 – Residential Heritage Areas – Interface Sites and Character Area Overlay Maps	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, Appendix 9.3.7.9 should be deleted.	Delete.

No.	Provision	Position	Submission	Relief Sought
Chapter 9 Natural and Cultural Heritage, Sub Chapter 9.4 Significant and Other Trees				
1.	General / all Including: 9.4.1 (c) Introduction; Policy 9.4.2.2.3 Tree Protection; 9.4.3(a) & (f) how to	Oppose.	The submitter opposes the identification of selected scheduled trees as qualifying matters. The operative provisions relating to scheduled trees provide sufficient protection for such trees (including development buffers) and the presence of trees need not preclude more intensive forms of development.	Delete.

No.	Provision	Position	Submission	Relief Sought
	interpret and apply the rules; and 9.4.4. Rules			
2.	Appendix 9.4.7.1 Schedules of significant trees	Oppose in part	<p>Two scheduled trees are identified for the property at 32 Armagh Street. The submitted does not agree that the trees are of such significance as to warrant their listing and protection, particularly given that their retention significantly constrain the development capacity of the site. In the submitter's views, these significant costs outweigh any benefits of scheduling.</p> <p>For these reasons, the listing of the 2 scheduled trees at 32 Armagh Street is inappropriate and should be deleted.</p>	Amend Appendix 9.4.7.1, so as to delete the scheduling of the common lime and variegated sycamore trees at 32 Armagh Street.

No.	Provision	Position	Submission	Relief Sought
Chapter 13.6 SP School				
1.	Policy 13.6.2.1.2 Effects on neighbourhoods	Support	The amended wording of this policy heading better reflects the provisions in the NPS-UD and is supported.	Adopt.

No.	Provision	Position	Submission	Relief Sought
2.	13.6.4.1.3 Restricted discretionary activities	Support	The amended wording within the table (insofar as it refers to 'Effects on...') better reflects the provisions in the NPS-UD and is supported.	Adopt.
3.	13.6.4.1.3 RD5	Support in part	The proposed rule is generally supported, however restricted discretionary status is not 'enabling' and accounting for the development intensity envisaged by the NPS-UD in high density residential areas, the submitter considers controlled activity status for this provision is more appropriate.	Amend rule 13.6.4.1.3 RD5, such that it is a controlled activity standard.
4.	13.6.4.2 (a)	Oppose	<p>This rule states that built form standards do not apply to those parts of school sites occupied by heritage items and settings, with development otherwise controlled by Chapter 9.3 Historic Heritage.</p> <p>The submitter considers that the built form standards remain a relevant basis for establishing permitted built form, given that the heritage provisions in chapter 9.3 will otherwise provide a framework for determining whether that built form is appropriate in the context of relevant heritage values.</p> <p>In the absence of built form standards applying (as is proposed), users of the Plan will have considerable uncertainty as to what</p>	Delete.

No.	Provision	Position	Submission	Relief Sought
			built form may or may not be appropriate to the site and locality generally.	
5.	13.6.4.2.1 Maximum site coverage	Oppose in part	The submitter opposes the amendments to the rule, to the extent that it will impose greater constraints on building site coverage than the status quo. This will limit development capacity in a manner that is inconsistent with the NPS-UD.	Retain the status quo, insofar that the amendments propose greater constraints on building site coverage than the status quo.
6.	13.6.4.2.2 Height in relation to boundary	Oppose in part	The submitter opposes the amendments to the rule, to the extent that it will impose greater constraints on building height in relation to boundaries than the status quo. This will limit development capacity in a manner that is inconsistent with the NPS-UD.	Retain the status quo, insofar that the amendments propose greater constraints on building height in relation to boundaries than the status quo.
7.	13.6.4.2.3 Minimum building setback from road boundaries	Oppose in part	The submitter opposes the amendments to the rule, to the extent that it will impose greater building setbacks from road boundaries than the status quo. This will limit development capacity in a manner that is inconsistent with the NPS-UD.	Retain the status quo, insofar that the amendments propose greater building setbacks from road boundaries than the status quo.
8.	13.6.4.2.4 Minimum building setback from internal boundaries	Oppose in part	The submitter opposes the amendments to the rule, to the extent that it will impose greater building setbacks from internal boundaries and/or constraints on building length, relative to the status quo. This will	Retain the status quo, insofar that the amendments propose greater building setbacks from internal boundaries and/or constraints on building length, relative to the status quo.

No.	Provision	Position	Submission	Relief Sought
	and maximum building length		limit development capacity in a manner that is inconsistent with the NPS-UD.	
9.	13.6.4.2.5 Maximum building height	Support	The amendments better enable development capacity and are supported.	Adopt.
10.	13.6.4.2.6 Landscaping	Oppose	The submitter opposes this new rule, noting it will limit development capacity in a manner that is inconsistent with the NPS-UD.	Delete.
11.	13.6.5.1 Effects on the neighbourhood	Oppose	The submitter opposes the proposed amendments to the assessment matter, noting it will impose additional constraints on and uncertainty for developments, and in doing so will limit development capacity in a manner that is inconsistent with the NPS-UD.	Delete.

No.	Provision	Position	Submission	Relief Sought
Chapter 14 Residential				

No.	Provision	Position	Submission	Relief Sought
Objectives & Policies				
1.	Objective 14.2.1	Support	The amendments to the objective are appropriate and better reflect the provisions of the NPS-UD.	Adopt.
2.	Policy 14.2.1.1	Support	The amendments to the policy are appropriate and better reflect the provisions of the NPS-UD. They otherwise appropriately remove unnecessarily prescriptive references to minimum densities for different zones.	Adopt.
3.	Policy 14.2.1.2	Support	The deletion of the policy is supported.	Adopt
4.	Policy 14.2.1.2	Support	The deletion of the policy is supported, accounting for the changes proposed in response to the NPS-UD and Amendment Act.	Adopt
5.	Policy 14.2.1.3	Support	The deletion of the policy is supported, accounting for the changes proposed in response to the NPS-UD and Amendment Act.	Adopt
6.	Policy 14.2.3.6	Support	The proposed policy is supported, accounting for the directives within the NPS-UD and Amendment Act.	Adopt

No.	Provision	Position	Submission	Relief Sought
7.	Policy 14.2.3.7	Oppose	The proposed policy is opposed, insofar as it states that increased buildings heights should 'only' be provided for where the matters listed in i-v. of the policy are achieved. Such requirements are not required by or consistent with the NPS-UD and Amendment Act.	Delete.
8.	Objective 14.2.5	Support	The proposed policy is supported, accounting for the directives within the NPS-UD and Amendment Act.	Adopt.
9.	Policy 14.2.5.1	Oppose	The proposed policy is opposed, insofar as it stipulates site layout and building design requirements that are not otherwise required by, or are inconsistent with, the NPS-UD and Amendment Act.	Delete.
10.	Policy 14.2.5.2	Support	The proposed amendments to the policy are supported, accounting for the directives within the NPS-UD and Amendment Act.	Adopt.
11.	Policy 14.2.5.3	Oppose	The proposed policy is opposed, insofar as it stipulates site layout and building and landscaping design requirements that are not otherwise required by, or are inconsistent with, the NPS-UD and Amendment Act.	Delete.

No.	Provision	Position	Submission	Relief Sought
12.	Policy 14.2.5.4	Oppose	The proposed policy is opposed, insofar as it stipulates on site waste and recycling requirements that are not otherwise required by, or are inconsistent with, the NPS-UD and Amendment Act.	Delete.
13.	Policy 14.2.5.5	Oppose	<p>The proposed policy is opposed, insofar as it stipulates wind management requirements that are not otherwise required by, or are inconsistent with, the NPS-UD and Amendment Act.</p> <p>The submitter is particularly concerned at the cost and practical implications of providing assessments in accordance with this policy, noting the highly specialised expertise required (with associated cost, availability and time implications).</p> <p>The submitter is also concerned at the potentially subjective nature of aspects of the policy.</p>	Delete.
14.	Policy 14.2.5.6	Support	The proposed amendments to the policy are supported, accounting for the directives within the NPS-UD and Amendment Act.	Adopt.
15.	Objective 14.2.6	Support	The proposed objective is supported, accounting for the directives within the NPS-UD and Amendment Act.	Adopt.

No.	Provision	Position	Submission	Relief Sought
16.	Policy 14.2.6.2	Support	The proposed policy is supported, accounting for the directives within the NPS-UD and Amendment Act.	Adopt.
17.	Objective 14.2.7	Support	The proposed objective is supported, accounting for the directives within the NPS-UD and Amendment Act.	Adopt.
18.	Policy 14.2.7.1	Support	The proposed policy is supported, accounting for the directives within the NPS-UD and Amendment Act.	Adopt.
19.	Policy 14.2.7.2	Support	The proposed policy is supported, accounting for the directives within the NPS-UD and Amendment Act.	Adopt.
20.	Policy 14.2.7.3	Support	The proposed policy is supported, accounting for the directives within the NPS-UD and Amendment Act.	Adopt.
21.	Policy 14.2.7.4	Support in part	The proposed policy is generally supported, accounting for the directives within the NPS-UD and Amendment Act. However, the submitter is concerned as to the potentially inappropriate constraints on development resulting from the words 'and restrict development to solely within...'. The proposed policy is generally supported, accounting for the directives within the NPS-UD and Amendment Act. However, the	Amend to delete the words ',and restrict development to solely within,'.
22.	Policy 14.2.7.5	Support	The proposed policy is generally supported, accounting for the directives within the NPS-UD and Amendment Act. However, the	Amend to delete the words ',and restrict development to solely within,'.

No.	Provision	Position	Submission	Relief Sought
			submitter is concerned as to the potentially inappropriate constraints on development resulting from the words 'and restrict development to solely within...'. 	
23.	Policy 14.2.7.6	Support	The proposed policy is supported, accounting for the directives within the NPS-UD and Amendment Act.	Adopt.
24.	Objective 14.2.8	Support	The proposed objective is supported, accounting for the directives within the NPS-UD and Amendment Act.	Adopt.
Rules Introduction				
1.	14.3 (f)	Oppose	For the reasons set out in their submission on sub chapter 6.1A, the submitter opposes the extent of qualifying matters listed and seeks that this rule be amended in a manner consistent with the relief sought on that chapter.	Delete, in a manner consistent with the submission on chapter 6.1A.
RS and RSDT Zones				
1.	Rule 14.5.3.1.3 Area-specific restricted discretionary activities	Oppose.	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, Rule 14.5.3.1.3 should be deleted.	Delete.

No.	Provision	Position	Submission	Relief Sought
2.	Rule 14.4.2.2 Tree and garden planting	Oppose	The proposed amendments incorporating tree planting rules are opposed for the reasons expressed in regards Chapter 6.10A.	Delete.
RMD Zones				
1.	Rule 14.5	Oppose	<p>The submitter generally opposes any/all amendments to the RMD zone provisions, to the extent that these conflict with or are less enabling than the mandatory MDRS and/or impose additional constraints relative to the status quo.</p> <p>In the submitter's view, such requirements are not otherwise required by, or are inconsistent with, the NPS-UD and Amendment Act.</p> <p>Specific provisions of concern are further noted in the submission points below.</p>	Delete all new or amended provisions, to the extent that they conflict with or are less enabling than the mandatory MDRS and/or impose additional constraints relative to the status quo.
2.	Rule 14.5.2 Built form standards	Oppose	<p>Proposed new built form standards or amendments to existing standards are opposed to the extent that they conflict with or are less enabling than the mandatory MDRS and/or impose additional constraints relative to the status quo.</p> <p>Specific amendments requiring deletion include:</p>	Delete all new or amended provisions, to the extent that they conflict with or are less enabling than the mandatory MDRS and/or impose additional constraints relative to the status quo.

No.	Provision	Position	Submission	Relief Sought
			<p>Rule 14.5.2.2 (c)-(e) – landscaping & tree canopy</p> <p>Rule 14.5.2.9 - fences</p> <p>Rule 14.5.2.12 – ground floor habitable room</p> <p>Rule 14.5.2.13 – service, storage & waste spaces</p> <p>Rule 14.5.2.15 – garaging and carport location</p> <p>Rule 14.5.2.17 – location of mechanical ventilation</p> <p>Rule 14.5.2.18 – City Spine Transport corridor</p>	
3.	Rule 14.5.2.4 (c) Site coverage	Support	The exemption for eaves and roof overhangs is supported.	Adopt.
4.	Rule 14.5.3.1.3 Area-specific restricted discretionary	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, Rule 14.5.3.1.3 RD15 should be deleted.	Delete.

No.	Provision	Position	Submission	Relief Sought
	activities RD15			
5.	Rule 14.5.3.2 Area-specific built form standards	Oppose	<p>Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, Rule 14.5.3.2 should be deleted, insofar that this concerns heritage areas. This includes:</p> <p>Rule 14.5.3.2.3 Building Height</p> <p>Rule 14.5.3.2.7 Residential units per site</p> <p>14.5.3.2.8 Setbacks</p> <p>14.5.3.2.9 Building coverage</p> <p>14.5.3.2.10 Outdoor living space per unit</p>	<p>Delete the following rules, insofar that they refer to Heritage areas:</p> <p>Rule 14.5.3.2.3 Building Height</p> <p>Rule 14.5.3.2.7 Residential units per site</p> <p>14.5.3.2.8 Setbacks</p> <p>14.5.3.2.9 Building coverage</p> <p>14.5.3.2.10 Outdoor living space per unit</p>
High Density Residential Zone Provisions				
1.	Rule 14.6	Oppose	<p>The submitter generally opposes any/all amendments to the High Density Residential zone provisions, to the extent that these conflict with or are less enabling than the mandatory MDRS, the directives in NPS-UD policy 3, and/or impose additional constraints relative to the status quo.</p> <p>In the submitter's view, such requirements are not otherwise required by, or are</p>	<p>Delete all new or amended provisions, to the extent that they conflict with or are less enabling than the mandatory MDRS and/or impose additional constraints relative to the status quo.</p>

No.	Provision	Position	Submission	Relief Sought
			<p>inconsistent with, the NPS-UD and Amendment Act.</p> <p>Specific provisions of concern are further noted in the submission points below.</p>	
2.	Rule 14.6.1.3	Oppose	<p>Rules 14.6.1.3 RD6-RD23 entail requirements that are onerous, inefficient and ineffective and which will limit development capacity. Such requirements are not otherwise required by, or are inconsistent with, the NPS-UD and Amendment Act.</p> <p>A number of these standards are complex or unclear and do not accord with the requirements of objective 3.3.2.</p> <p>As restricted discretionary activities, these standards are not enabling of development, as required by the Amendment Act. If such standards are found to be appropriate, they should be imposed as controlled activity standards.</p>	Delete, to the extent that the proposed amendments conflict with or are less enabling than the mandatory MDRS.
3.	Rule 14.6.2.1 Building height	Oppose, in part	Whilst provision for increased building height is supported, a 14m building height is inadequate for a high density residential zone within the central city, where Policy 3 (c) of the NPS-UD directs that development of up to six stories is to be 'enabled'.	Amend, so as to provide for a 23m maximum building height.

No.	Provision	Position	Submission	Relief Sought
			In order to 'enable' development of up to six stories a height limit of 23m as a permitted activity is required for this zone.	
4.	Rule 14.6.2.2 height in relation to boundary And Appendix 14.16.2	Oppose	<p>The submitter opposes the height in relation to boundary QM and submits that only the angles and heights that must be included from Schedule 3A, Part 2, Density Standards (12) Height in Relation to Boundary of the Housing Supply Act be included in the District Plan.</p> <p>The QM/ appendix compromises the enablement of development and does not reduce regulatory constraints and increase housing supply as required through the Amendment Act and the NPS-UD.</p>	Amend Rule 14.6.2.2 and Appendix 14.16.2, to align with Schedule 3A, Part 2, Density Standards (12) Height in Relation to Boundary of the Amendment Act.
5.	Rule 14.6.2.5 Building separation	Oppose	The requirements of this rule are not required by and are inconsistent with, the NPS-UD and Amendment Act.	Delete.
6.	Rule 14.6.2.6 Fencing and screening	Oppose	The requirements of this rule are not required by and are inconsistent with, the NPS-UD and Amendment Act.	Delete.
7.	Rule 14.6.2.7 Landscaping and tree canopy cover	Oppose	The requirements of this rule are not required by and are inconsistent with, the NPS-UD and Amendment Act. The requirements will limit development capacity	Delete.

No.	Provision	Position	Submission	Relief Sought
			and are otherwise opposed for the reasons expressed in the submission on chapter 6.10A.	
8.	14.6.2.12 Building Coverage	Oppose	<p>50% site coverage is not appropriate in the HRZ Zone given that there are currently no building coverage limitations in the Residential Central City Zone. This rule is more restrictive than the current operative provisions. There should be no site coverage limit in the HRZ.</p> <p>The rule compromises the extent to which planning provisions enable development and does not reduce regulatory constraints and increase housing supply as required through the Amendment Act and the NPS-UD.</p>	Delete.
9.	<p>Rule 14.15.3(a) impacts on neighbouring property</p> <p>Matters of control and discretion</p>	Oppose	<p>The submitter considers that Clause 14.15.3 (a) need simplifying and amending to ensure it appropriately addresses the rules to which it relates. The rule is headed 'impacts on neighbouring properties' yet many of the matters do not relate to effects on neighbouring properties. The long list of matters is not in accordance with the enabling provisions of the NPS-UD.</p> <p>The extent of discretion compromises the extent to which planning provisions enable development and does not reduce regulatory constraints and increase housing supply as</p>	<p>Amend rule 14.15.3(a) as follows:</p> <p><i>a. Whether the increased height, or reduced setbacks, or recession plane intrusion would result in buildings that do not compromise the amenity of adjacent properties planned urban built character, taking into account. The following matters of discretion apply...</i></p> <p>[i.e. delete the balance of clause (a)]</p>

No.	Provision	Position	Submission	Relief Sought
			required through the Amendment Act and the NPS-UD.	

No.	Provision	Position	Submission	Relief Sought
Chapter 15 Commercial				
Chapter 15 objectives & policies:				
1.	General feedback re policies	Oppose	PC14 fails to include policy provisions that explicitly implement the NPS-UD directives in Policy 3 in regards to building height and provide clear expectations in regards to the heights of buildings, particularly in the central city.	Insert a new and explicit policy in regards to anticipated building heights, consistent with NPS-UD policy 3.
2.	Policy 15.2.2.1 (Role of Centres)	Support with amendment	<p>Amendments anticipating 'high' rather than 'medium' density housing in and around town centre and local centre zones are generally supported.</p> <p>In respect of Table 15.1, Avonhead Mall is identified as a 'small' Local Centre, which has corresponding implications in respect of development potential. In respect of building height especially, such centres are constrained to 12m building height which is equivalent to the height permitted in surrounding residential zones and limits the</p>	Amend Table 15.1 to reclassify Avonhead as a Local Centre (<u>large</u>), rather than Local Centre (small).

No.	Provision	Position	Submission	Relief Sought
			<p>potential/practical intensification of this commercially zoned land resource.</p> <p>Given the extent of intensification provided for in the surrounding residential catchment (and likely increase in population as a consequence) and the absence of other commercial centres and activity in this catchment, a corresponding level of intensification at Avonhead mall is appropriate.</p> <p>Such intensification could occur without escalating the status of Avonhead in the commercial centres hierarchy (to a TCZ) by reclassifying the centre as a Local Centre (large).</p>	
3.	Objective 15.2.3 (Office parks & mixed use areas)	Support	The wording of this provision is generally supported.	Adopt.
4.	Policy 15.2.3.2 (Mixed use areas)	Support	The wording of this provision is generally supported.	Adopt.

No.	Provision	Position	Submission	Relief Sought
5.	Objective 15.2.4 (urban form, scale & design outcomes)	Support with amendment	<p>With the exception of clauses (a)(iv) and (vi) the wording is supported.</p> <p>In respect of clause (a)(iv) and (vi) the requirement for individual developments to 'manage adverse effects... that contribute to climate change' and 'support a reduction in greenhouse gas emissions' is uncertain and difficult to apply/administer for individual applications.</p> <p>Whilst such objectives are commendable, they should be directed at broader patterns of development rather than individual applications.</p>	<p>Amend clause (a)(iv) and (vi) as follows:</p> <p><i>iv. manages adverse effects (including reverse sensitivity effects) on the site and surrounding environment, including effects that contribute to climate change; and</i></p> <p><i>... vi. Promotes a zoning and development framework that supports a reduction in greenhouse gas emissions.</i></p>
6.	Policy 15.2.4.1 (Scale & form of development)	Oppose in part	<p>The proposed amendments to clause (a) of this policy introduce wording that is unclear, subjective and inappropriate. Clause (a) also seeks to constrain building heights and form within the central city in a manner that is inconsistent with the NPS-UD and the Amendment Act.</p> <p>Clause (b) of the policy is supported.</p>	<p>Delete the amendments to clause (a) of the policy.</p> <p>Adopt the amendments to clause (b) of the policy.</p>
7.	Policy 15.2.4.2 (Design of new development)	Oppose in part	<p>Clause (a) of this policy 'requires' new development to meet the various requirements listed in sub-clauses (i)-(x). Accordingly, it is important that those requirements are appropriately framed in terms of the outcomes sought, the certainty</p>	<p>Amend clause (a) of the policy as follows:</p> <p><i>a. Require new development to be well-designed and laid out by:</i></p> <p>...</p>

No.	Provision	Position	Submission	Relief Sought
			<p>they provide and the extent to which they support the purpose of PC14 to 'enable a greater scale and density of residential and business development in urban areas'.</p> <p>Against this context, the proposed amendments to this policy are opposed on the basis that they are uncertain, unreasonable, and/or do not support the purpose of PC14.</p> <p>Proposed amendments to the balance of the policy are supported.</p>	<p>viii. achieving a visually <u>appealing attractive</u> setting when viewed from the street and other public spaces, <u>that embodies a human scale and fine grain</u>, while managing effects on adjoining environments;</p> <p>[delete proposed clauses x-xv.]</p> <p>Retain the balance of the policy and amendments as proposed.</p>
8.	<p>Policy 15.2.5.1</p> <p>(Cathedrals in the Central City)</p>	Oppose in part	<p>This policy seeks to 'Provide for the individual design, form and function of new spiritual facilities and associated buildings at 100 Cathedral Square and 136 Barbadoes Street'.</p> <p>The policy is appropriate, but PC14 should amend the wording to recognise the establishment of a new cathedral for the Catholic Diocese of Christchurch in the city block bounded by Colombo / Armagh / Manchester Streets and Oxford Terrace (not 136 Barbadoes Street).</p> <p>Given that the purpose of PC14 is to support intensification, amendments to the policy to support the establishment of the new cathedral (and its design, form and function</p>	<p>Amend policy 15.2.5.1 as follows:</p> <p>a. Provide for the individual design, form and function of new spiritual facilities and associated buildings at 100 Cathedral Square, and 136 Barbadoes Street, <u>and within the city block bounded by Colombo Street, Armagh Street, Manchester Street and Oxford Terrace</u> that:</p>

No.	Provision	Position	Submission	Relief Sought
			requirements) on its central city site is appropriate.	
9.	Policy 15.2.6.3 (Amenity)	Oppose in part	The proposed wording in clause (a)(ii) is opposed, insofar that this relates to constraints on built form which limit development capacity in a manner that is inconsistent with the NPS-UD and Amendment Act.	Delete the proposed amendments in clause (a)(ii).
10.	Policy 15.2.6.4 (Residential intensification)	Oppose in part	<p>Whilst <i>some</i> of the proposed additions to this policy concern matters that may be relevant considerations for new residential developments (e.g. as assessment matters), <i>requiring</i> such matters within the policy potentially escalates their importance and may impose a 'policy barrier' to applications where the provision these requirements is not appropriate, necessary, or practicable.</p> <p>And, as set out in other submission points, a number of these matters are considered unnecessary and inappropriate, for the purposes of promoting intensification.</p> <p>Accordingly, the proposed additions to the sub-clauses within the policy should be deleted.</p>	Delete the proposed amendments in clauses (a)(vi)-(viii).
11.	Policy 15.2.6.5	Oppose	As set out in other submission points, controls on wind generation are opposed due to the difficulties of evaluating such	Delete.

No.	Provision	Position	Submission	Relief Sought
	(Pedestrian focus)		<p>effects with certainty and the practical limitations on obtaining such assessments. Moreover, changes to wind generation and the pedestrian environment are a necessary tradeoff contemplated by the NPS-UD, insofar as it directs maximum intensification of central city environments.</p> <p>The proposed amendment is otherwise unnecessary and inappropriate, for the purposes of promoting intensification.</p> <p>Accordingly, the proposed addition to the policy should be deleted.</p>	
12.	Policy 15.2.7.1 (Diversity of activities)	Support	The policy is an enabling policy encouraging a diversity of activities and the amendments are supported.	Adopt.
13.	Policy 15.2.8.1 (Usability & adaptability)	Oppose	<p>The proposed addition of subclauses (a)(iv)-(vi) is opposed on the basis that such requirements do not reflect the operational and functional requirements of activities and buildings within the CCMUZ.</p> <p>If such requirements are intended to apply only to new residential developments, then the policy should be drafted to make this explicit (as is the case with policy 15.2.8.2 or clause vi. for example).</p>	<p>Delete subclauses (a)(iv)-(vi) of the policy as follows:</p> <p><i>a. Encourage a built form where the usability and adaptability of sites and buildings are enhanced by:</i></p> <p><i>iv. providing dedicated pedestrian access for each activity within a development, directly accessed from the street or other publicly accessible space;</i></p> <p><i>v. providing sufficient setbacks and glazing at the street frontage; and</i></p>

No.	Provision	Position	Submission	Relief Sought
				vi. where residential activity is located at the ground floor, ensuring the design of development contributes to the activation of the street and other public spaces.
14.	Policy 15.2.8.2 (Amenity & effects)	Support with amendment	<p>With the exception of subclauses (a)(iv) and (vi) and the addition of the word 'including' in the prefacing text, the policy is generally supported.</p> <p>Subclause (a)(v) is opposed on the basis that: 'locating outdoor service space and car parking away from street frontages and entrances to buildings' may not always be practicable or desirable and may establish a policy barrier to activities in such cases.</p> <p>Subclause (a)(viii) is opposed on the basis that urban design assessments impose unnecessary time, cost, and uncertainty for developments and built form standards provide a preferable method for managing development and providing certainty to all parties.</p> <p>The proposed amendments are otherwise unnecessary and inappropriate, for the purposes of promoting intensification.</p> <p>Accordingly, the proposed additions to the policy should be deleted.</p>	Delete subclauses (a)(v) and (viii) of the policy.
Chapter 15 – Commercial Local Centre Zone Provisions:				

No.	Provision	Position	Submission	Relief Sought
1.	Rule 15.5.1.1 P21 (LCZ- activity standards for residential activity)	Oppose	<p>The proposed amendments introduce additional design standards (re: outdoor living space, glazing and outlook space requirements).</p> <p>Such changes are not necessary or appropriate for the purposes of promoting intensification and they impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty.</p> <p>Accordingly, these amendments should be deleted.</p>	Retain the status quo in respect of Rule 15.5.1.1 P21.
2.	Rule 15.5.1.3 RD1 (LCZ- RDA consent requirements)	Oppose	<p>For the reasons set out above in respect of Rule P21, the amendments to rule RD1 (which specify a requirement for consent for a breach of the proposed additional rules in P21) are also opposed.</p> <p>As stated above, such changes are not necessary or appropriate for the purposes of promoting intensification and they impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty.</p> <p>Accordingly, these amendments should be deleted.</p>	Retain the status quo in respect of Rule 15.5.1.3 RD1.

No.	Provision	Position	Submission	Relief Sought
3.	Rule 15.5.2.2 (LCZ- Building height)	Support	The proposed amendments to this rule support the purpose of PC14 in respect of intensification and are supported.	Retain the amendments as proposed.
4.	Rule 15.5.2.5 (LCZ- Height in relation to boundary)	Support	The proposed amendments to this rule support the purpose of PC14 in respect of intensification and are supported.	Retain the amendments as proposed.
Chapter 15 – Commercial Central City Zone Provisions:				
1.	Rule 15.11.1.1 P13 (CCZ residential activity)	Oppose	Proposed changes to clauses (e) and (f) regarding minimum outdoor living space requirements and new clauses (h) and (i) regarding outlook space are opposed. Such rules amount to greater regulatory constraint on residential development and are therefore not enabling of intensification. Accordingly, such changes should be deleted.	Delete.
2.	Rule 15.11.1.2 C1 Controlled activities	Oppose in part	The submitter supports certification as a method and considers its application should not be limited to buildings 28m or less in height, or those compliant with rules 15.11.2.3 (sunlight and outlook for the street) or 15.11.2.12 (road wall height),	Amend Rule 15.11.1.2 C1 as follows: <i>a. Any new building, external alteration to any existing building, or the use of any part of a site not occupied by a building, for an activity listed in Rule 15.101.1.1 P1 to P17, which is:</i>

No.	Provision	Position	Submission	Relief Sought
			<p>given that such buildings will trigger restricted discretionary activity status in respect of those rules and provide Council with discretion to consider the corresponding assessment matters. To the extent that the urban design outcomes are otherwise achieved, this can still be assessed and certified by an independent urban design expert.</p>	<p>i. within the Central City Core area 28m or less in height; and</p> <p>ii. visible from a publicly owned and accessible space; and</p> <p>iii. meets the following built form standards:</p> <p>A. Rule 15.11.2.3 Sunlight and outlook for the street; and/or</p> <p>B. Rule 15.11.2.12 Maximum road wall height;</p> <p>iv. iii. is certified by a qualified expert on a Council approved list as meeting each of the urban design provisions/ outcomes...</p>
3.	<p>Rule 15.11.1.3 RD5</p> <p>(CCZ- RDA consent requirement)</p>	Oppose	<p>For the reasons set out below in respect of the corresponding built form standards that are proposed, the amendments to rule RD5 are also opposed, noting these specify a requirement for consent for a breach of the following new rules:</p> <ul style="list-style-type: none"> A. Maximum building height B. Upper floor setbacks C. Tower dimension, site coverage and separation D. Wind <p>As stated below, such changes are not necessary or appropriate for the purposes of promoting intensification and they impose</p>	<p>Retain the status quo in respect of Rule 15.11.1.3 RD5.</p>

No.	Provision	Position	Submission	Relief Sought
			<p>additional consenting requirements with associated implications in terms of time, cost, and uncertainty.</p> <p>Accordingly, these amendments should be deleted.</p>	
4.	<p>Rule 15.11.1.3 RD11</p> <p>(CCZ- RDA consent requirement)</p>	Oppose	<p>For the reasons set out below in further detail in respect of the building height built form standard (Rule 15.11.2.11 Building Height), this rule is opposed and should be deleted.</p>	Delete.
5.	<p>Rule 15.11.1.4 D1</p> <p>(CCZ- DA consent requirement)</p>	Oppose	<p>Retaining discretionary status for a breach of building height and road wall height is at odds with the NPS-UD and the purpose of PC14 and accordingly this rule should be deleted.</p> <p>Building height and road wall height should be provided for as a permitted activity noting the control/discretion of building design that is otherwise afforded by the urban design rule (C1 and RD1).</p>	Delete Rule 15.11.1.4 D1 in its entirety.
6.	<p>Rule 15.11.2.3 Sunlight and</p>	Support	<p>The proposed amendments to this rule support the purpose of PC14 in respect of intensification and are supported.</p>	Adopt.

No.	Provision	Position	Submission	Relief Sought
	outlook for the street			
7.	Rule 15.11.2.9 Sunlight and outlook at the boundary with a residential zone	Support	The proposed amendments to this rule support the purpose of PC14 in respect of intensification and are supported.	Adopt.
8.	Rule 15.11.2.11 Building Height	Oppose	<p>The height limits in this rule are opposed in their entirety by the submitter.</p> <p>Among other reasons:</p> <ul style="list-style-type: none"> The rules are fundamentally inconsistent with the requirements in policy 3 of the NPS-UD to '<i>enable... building heights and density of built form to realise as much development capacity as possible, to maximise benefits of intensification</i>'. Policy 3 was drafted specifically for New Zealand's Tier 1 cities – all of which feature heritage sites and buildings – indicating such built form is envisaged alongside these features. 	Delete rule 15.11.2.11 in its entirety.

No.	Provision	Position	Submission	Relief Sought
			<ul style="list-style-type: none"> • The variable height limits for different parts of the city are arbitrary, inconsistent and inequitable. • To the extent that variable height limits are proposed in response to heritage values/features, this incorrectly assumes that building height and high density built form is inherently incompatible with heritage values. Such a conclusion is at odds with the evidence of successful intensive inner city development in international cities alongside heritage features of considerably greater significance. Vibrant central cities (as sought by objectives in chapters 3 and 15) inherently feature heritage items alongside substantial modern buildings, and to rely on heritage features as a basis for limiting built form and height is narrow-minded, conservative and myopic. • The heritage interfaces (and associated provisions) are generally opposed for the reasons stated in the covering submission. Among other things, it is noted that the heritage provisions in subchapter 9.3 provide for the management of buildings within heritage settings or alterations to heritage items. 	

No.	Provision	Position	Submission	Relief Sought
			<p>Accordingly, there is no need to separately constrain building height alongside or within heritage settings.</p> <ul style="list-style-type: none"> • The height limits fail to adequately account for planned development currently progressing in parts of the City Centre Zone where lower heights are proposed. This includes the Catholic Cathedral Precinct (which includes the sites with road boundaries on the north side of Armagh Street at 129, 131, 133, 137 and 143 Armagh Street) and the Cathedral Square Height Precinct, where significant development proposals currently being planned entail buildings of a greater height than the proposed rules permit. • The design of tall buildings is otherwise managed by way of the control/discretion afforded by the urban design rule (C1 and RD1). <p>Accounting for the points above and given that the proposed constraints on building heights are not necessary or appropriate for the purposes of promoting intensification, they should be deleted, such that no</p>	

No.	Provision	Position	Submission	Relief Sought
			maximum height limit applies throughout the City Centre Zone.	
9.	Rule 15.11.2.12 (CCZ – road wall height)	Oppose	Retaining a maximum road wall height rule is at odds with the NPS-UD and the purpose of PC14 and accordingly this rule should be deleted. Road wall heights should be unconstrained and provided for as a permitted activity noting the control/discretion of building design that is otherwise afforded by the urban design rule (C1 and RD1).	Delete Rule 15.11.2.12 in its entirety.
10.	Rule 15.11.2.14 (CCZ – building tower setbacks)	Oppose	Imposing new, additional rules regulating the design of buildings in a manner that may not be functional, efficient, economically viable and which may constrain the realisation of central city intensification is at odds with the NPS-UD and the purpose of PC14 and accordingly this rule should be deleted. To the extent that such matters warrant consideration through a consenting framework, the control/discretion of building design that is otherwise afforded by the urban design rule (C1 and RD1) is considered sufficient to address this matter.	Delete Rule 15.11.2.14 in its entirety.
11.	Rule 15.11.2.15	Oppose	Imposing new, additional rules regulating the design of buildings in a manner that may	Delete Rule 15.11.2.15 in its entirety.

No.	Provision	Position	Submission	Relief Sought
	(CCZ – max tower dimension and upper floor site coverage)		<p>not be functional, efficient, economically viable and which may constrain the realisation of central city intensification is at odds with the NPS-UD and the purpose of PC14 and accordingly this rule should be deleted.</p> <p>To the extent that such matters warrant consideration through a consenting framework, the control/discretion of building design that is otherwise afforded by the urban design rule (C1 and RD1) is considered sufficient to address this matter.</p>	
12.	<p>Rule 15.11.2.16</p> <p>(CCZ – building tower separation)</p>	Oppose	<p>Imposing new, additional rules regulating the design of buildings in a manner that may not be functional, efficient, economically viable and which may constrain the realisation of central city intensification is at odds with the NPS-UD and the purpose of PC14 and accordingly this rule should be deleted.</p> <p>To the extent that such matters warrant consideration through a consenting framework, the control/discretion of building design that is otherwise afforded by the urban design rule (C1 and RD1) is considered sufficient to address this matter.</p>	Delete Rule 15.11.2.16 in its entirety.
13.	Rule 15.11.2.17	Oppose	Imposing new, additional rules regulating the design of buildings in a manner that may	Delete Rule 15.11.2.17 in its entirety.

No.	Provision	Position	Submission	Relief Sought
	(CCZ – Wind)		<p>not be functional, efficient, economically viable and which may constrain the realisation of central city intensification is at odds with the NPS-UD and the purpose of PC14 and accordingly this rule should be deleted.</p> <p>As set out in other submission points, controls on wind generation are opposed due to the difficulties of evaluating such effects with certainty and the practical limitations on obtaining such assessments. Moreover, changes to wind generation and the pedestrian environment are a necessary tradeoff contemplated by the NPS-UD, insofar as it directs maximum intensification of central city environments.</p> <p>The proposed rule is otherwise unnecessary and inappropriate for the purposes of promoting intensification and should be deleted.</p>	
Chapter 15 – Commercial Central City Mixed Use Zone Provisions:				
1.	<p>Rule 15.12.1.1 P16</p> <p>(CCMUZ residential activity)</p>	Oppose	<p>The proposed amendments introduce additional design standards (re: street setback, glazing and outlook space requirements).</p> <p>Such changes are not necessary or appropriate for the purposes of promoting intensification and they impose additional</p>	Retain the status quo in respect of Rule 15.12.1.1 P16.

No.	Provision	Position	Submission	Relief Sought
			consenting requirements with associated implications in terms of time, cost, and uncertainty. Accordingly, these amendments should be deleted.	
2.	Rule 15.12.1.2 C1 (CCMUZ - Catholic Cathedral)	Support, with amendment	The proposed rule is supported and appropriately implements policy 15.2.5.1. However, as noted in the submission above on policy 15.2.5.1, the provisions in PC14 should be amended to recognise the establishment of a new cathedral for the Catholic Diocese of Christchurch within the city block bounded by Colombo Street, Armagh Street, Manchester Street and Oxford Terrace. Given that the purpose of PC14 is to support intensification, amendments to the rule to support the establishment of the new cathedral (and its design, form and function requirements) on its chosen central city site is appropriate.	Amend Rule 15.12.1.2 C1 as follows: <i>a. Any building on the site at 136 Barbadoes Street within the city block bounded by Colombo Street, Armagh Street, Manchester Street and Oxford Terrace</i> <i>b...</i>
3.	Rule 15.12.1.3 RD2	Oppose	The changes proposed to this rule are not necessary or appropriate for the purposes of promoting intensification and they impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty.	Retain the status quo in respect of Rule 15.12.1.3 RD5.

No.	Provision	Position	Submission	Relief Sought
	(CCMUZ-RDA consent requirement)		Accordingly, these amendments should be deleted.	
4.	Rule 15.12.1.3 RD4 (CCMUZ-RDA consent requirement)	Oppose	This new rule and its requirement for consent for residential developments within the CCMUZ is not necessary or appropriate for the purposes of promoting intensification and will impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty. Accordingly, these amendments should be deleted.	Delete.
5.	Rule 15.12.1.3 RD5 (CCMUZ-RDA consent requirement)	Oppose	This new rule and its requirement for consent for buildings exceeding 17m height within the CCMUZ is not necessary or appropriate for the purposes of promoting intensification and will impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty. Accordingly, these amendments should be deleted.	Delete.
6.	Rule 15.12.1.3 RD6	Oppose	This new rule and its requirement for consent is not necessary or appropriate for the purposes of promoting intensification and will impose additional consenting	Delete.

No.	Provision	Position	Submission	Relief Sought
	(CCMUZ-RDA consent requirement)		requirements with associated implications in terms of time, cost, and uncertainty. Accordingly, these amendments should be deleted.	
7.	Advice note (at the end of 15.12.1.3)	Oppose	The advice note concerns residential heritage areas. For reasons stated in submissions specifically on residential heritage areas, this advice note is opposed.	Delete.
8.	Rule 15.12.2.1 (CCMUZ – Landscaping & trees)	Oppose in part	Proposed clause (a)(iv) increases landscaping requirements from 5% of the site area to 10%. This change is not necessary or appropriate for the purposes of promoting intensification and will in fact be counter to intensification by diminishing the area of the site available for built form/development. The rule change will also impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty. Accordingly, this amendment should be deleted.	Retain the status quo in clause (a)(iv) – i.e. 5% rather than 10% site landscaping.
9.	Rule 15.12.2.2	Oppose	The variable building heights and maximum building base heights are inadequate and inappropriate for a commercial zone within the central city, accounting for Policy 3(a) and Policy 3 (c) of the NPS-UD directs that	Amend as follows: 15.12.2.2 Maximum building height

No.	Provision	Position	Submission	Relief Sought
	(CCMUZ – building height)		<p>development of up to six stories is to be 'enabled' as a minimum.</p> <p>Accounting for this, the submitter seeks that the rule provide for a permitted maximum building height of at least 32m.</p>	<p><u><i>a. The maximum height of any building shall be 32 metres.</i></u></p> <p><i>b. The maximum height of any building shall be in accordance with the height specified Unless identified on the Central City Maximum Building Height planning map the maximum height of any building shall be 32 metres.</i></p> <p><i>b. The maximum height of any building base shall be 17 metres.</i></p> <p><i>b. Any application arising from this rule shall not be limited or publicly notified</i></p>
10.	<p>Rule 15.12.2.9</p> <p>(CCMUZ – Minimum number of floors)</p>	Oppose	<p>A prescriptive requirement for a minimum number of floors is opposed on the basis that this is not 'enabling' of development or responsive to the functional or operational needs of activities and commercial/market imperatives determining their optimal location.</p> <p>Accordingly, the proposed new rule requirement for a minimum of 3 floors is opposed.</p> <p>This change is not necessary or appropriate for the purposes of enabling intensification and will also impose additional consenting</p>	Delete Rule 15.12.2.9 in its entirety.

No.	Provision	Position	Submission	Relief Sought
			requirements with associated implications in terms of time, cost, and uncertainty. Accordingly, this amendment should be deleted.	
11.	Rule 15.12.2.10 (CCMUZ – building setbacks)	Oppose	Imposing new, additional rules regulating the design of buildings in a manner that may not be functional, efficient, economically viable and which may constrain the realisation of central city intensification is at odds with the NPS-UD and the purpose of PC14 and accordingly this rule should be deleted.	Delete Rule 15.12.2.10 in its entirety.
12.	Rule 15.12.2.11 (CCMUZ – building tower coverage)	Oppose	Imposing new, additional rules regulating the design of buildings in a manner that may not be functional, efficient, economically viable and which may constrain the realisation of central city intensification is at odds with the NPS-UD and the purpose of PC14 and accordingly this rule should be deleted.	Delete Rule 15.12.2.11 in its entirety.
13.	Rule 15.12.2.12 (CCMUZ – glazing)	Oppose	Imposing new, additional rules regulating the design of buildings in a manner that may not be functional, efficient, economically viable and which may constrain the realisation of central city intensification is at odds with the NPS-UD and the purpose of	Delete Rule 15.12.2.12 in its entirety.

No.	Provision	Position	Submission	Relief Sought
			PC14 and accordingly this rule should be deleted.	
Chapter 15 – Commercial Central City (South Frame) Mixed Use Zone Provisions:				
1.	Rule 15.13.1.1 P3 (CC(SF)MUZ commercial services & offices)	Support in part	<p>Given the central location of that part of this zone which is outside the Health and Innovation Precincts and that intensification of such land is likely to be realised by way of office development, the limitations in clause (a)(ii) of this rule limiting the total quantum of office activity are considered inappropriate and counter to the purpose of PC14.</p> <p>Retention of clause (a)(i) of the rule would ensure that any demand for large floor plate offices or larger office tenants is satisfied within the CCB zone.</p> <p>Enabling smaller office tenancies to establish within the CC(SF)MUZ would support, and not otherwise compromise, the intended role of the CCB zone.</p> <p>Noting the above, clause (a)(ii) of this rule should be deleted.</p>	<p>Delete activity standard (a) from Rule 15.13.1.1 P3, as follows:</p> <p><i>a. Outside the Health Precinct and/or the Innovation Precinct:</i></p> <p><i>i. Where office activities or commercial services are proposed on a site, individual tenancies shall not exceed 450m² of GLFA; and</i></p> <p><i>ii. The total area used for office activities and/or commercial services shall not exceed 450m² of GLFA per site, or 450m² of GLFA per 500m² of land area; whichever is greater. This limit may be exceeded where office activities and/or commercial services form part of a mixed-use development comprising residential activities, in which case the office activities and commercial services collectively shall not exceed 50% of the GLFA of the overall development.</i></p>
2.	Rule 15.13.1.1 P13	Oppose	The proposed amendments now require 20m ² (rather than 10m ²) of outdoor living space for residential units with a ground floor habitable space and otherwise	Retain the status quo in respect of Rule 15.13.1.1 P13.

No.	Provision	Position	Submission	Relief Sought
	(CC(SF)MUZ residential activity)		<p>introduce additional design standards (re: glazing and outlook space requirements).</p> <p>Such changes are not necessary or appropriate for the purposes of promoting intensification and they impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty.</p> <p>Accordingly, these amendments should be deleted.</p>	
3.	<p>Rule 15.13.1.3 RD5</p> <p>(CCMUZ-RDA consent requirement)</p>	Oppose	<p>For the reasons set out below in respect of the corresponding built form standards that are proposed, the amendments to rule RD2 are also opposed, noting these specify a requirement for consent for a breach of the following new rules:</p> <ul style="list-style-type: none"> A. Maximum building height B. Minimum number of floors C. Upper floor setbacks, tower dimension and site coverage D. Glazing <p>As stated below, such changes are not necessary or appropriate for the purposes of promoting intensification and they impose additional consenting requirements with</p>	Delete proposed new clauses (j)-(m) in Rule 15.13.1.3 RD5.

No.	Provision	Position	Submission	Relief Sought
			<p>associated implications in terms of time, cost, and uncertainty.</p> <p>Accordingly, these amendments should be deleted.</p>	
4.	<p>Rule 15.13.2.1</p> <p>(CC(SF)MUZ – height)</p>	Oppose	<p>The variable building heights and maximum building base heights are inadequate and inappropriate for a commercial zone within the central city, accounting for Policy 3(a) and Policy 3 (c) of the NPS-UD directs that development of up to six stories is to be 'enabled' as a minimum.</p> <p>Accounting for this, the submitter seeks that the rule provide for a permitted maximum building height of at least 32m.</p>	<p>Delete rule 15.13.2.1 as proposed and replace with the following:</p> <p>15.13.2.1 Building height</p> <p><u>a. The maximum height of any building shall be 32 metres.</u></p> <p><u>b. Any application arising from this rule shall not be limited or publicly notified.</u></p>
5.	<p>Rule 15.13.2.8</p> <p>(CC(SF)MUZ – minimum number of floors)</p>	Oppose	<p>The requirement for a minimum of 3, rather than 2 floors does not reflect the functional or operational requirements of many permitted activities that are expected to establish with the zone.</p> <p>This change is not otherwise necessary or appropriate for the purposes of promoting intensification and will in fact be counter to intensification by limiting more efficient forms of development based on a 3m ground floor height. The rule change will also impose additional consenting</p>	Retain the status quo in respect of Rule 15.13.2.10.

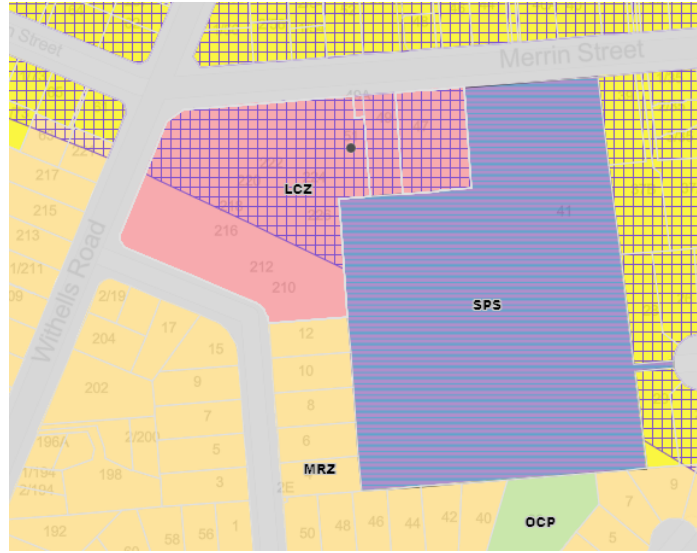
No.	Provision	Position	Submission	Relief Sought
			requirements with associated implications in terms of time, cost, and uncertainty. Accordingly, this amendment should be deleted.	
6.	Rule 15.13.2.10 (CC(SF)MUZ – building tower setbacks)	Oppose	Imposing new, additional rules regulating the design of buildings in a manner that may not be functional, efficient, economically viable and which may constrain the realisation of central city intensification is at odds with the NPS-UD and the purpose of PC14 and accordingly this rule should be deleted.	Delete Rule 15.12.2.10 in its entirety.
7.	Rule 15.13.2.11 (CC(SF)MUZ – building tower site coverage)	Oppose	Imposing new, additional rules regulating the design of buildings in a manner that may not be functional, efficient, economically viable and which may constrain the realisation of central city intensification is at odds with the NPS-UD and the purpose of PC14 and accordingly this rule should be deleted.	Delete Rule 15.12.2.11 in its entirety.
8.	Rule 15.13.2.12 (CC(SF)MUZ – glazing)	Oppose	Imposing new, additional rules regulating the design of buildings in a manner that may not be functional, efficient, economically viable and which may constrain the realisation of central city intensification is at odds with the NPS-UD and the purpose of	Delete Rule 15.12.2.12 in its entirety.

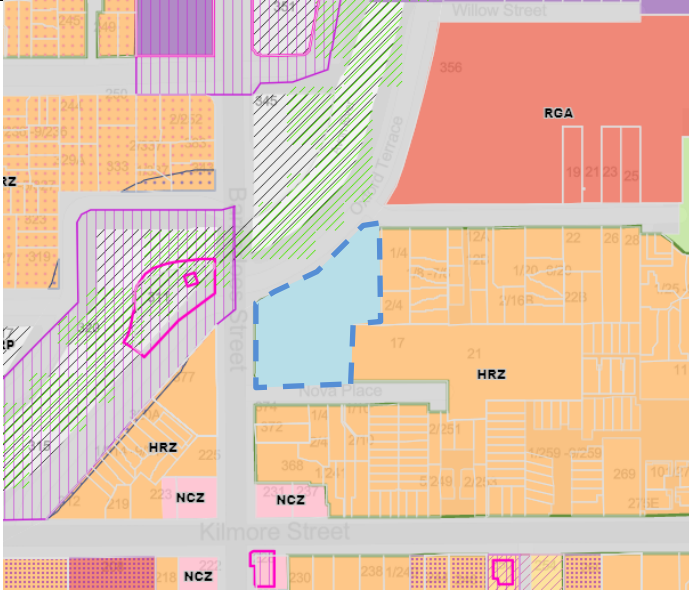
No.	Provision	Position	Submission	Relief Sought
			PC14 and accordingly this rule should be deleted.	
Chapter 15 – Commercial Zones- Matters of Discretion				
1.	Rule 15.14.3.1 (Matters of discretion- building height)	Oppose	<p>The proposed new matters of discretion in clause (b) for applications exceeding the permitted maximum building height are:</p> <ul style="list-style-type: none"> a. Unnecessary, insofar that they introduce matters that are otherwise within the scope of the operative matters . b. Unclear and uncertain. c. Excessively broad in scope. <p>These changes undermine the enablement of building height as directed by the NPS-UD and they are not otherwise necessary or appropriate for the purposes of promoting intensification. The rule change will also impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty.</p> <p>Accordingly, this amendment should be deleted.</p>	Retain the status quo in respect of Rule 15.14.3.1 (and delete the proposed assessment matters in clause (b) in their entirety).
2.	Rule 15.14.3.35	Oppose	The proposed new matters of discretion relate to rules that are otherwise opposed, and as such these should be deleted.	Delete Rule 15.14.3.35 in its entirety.

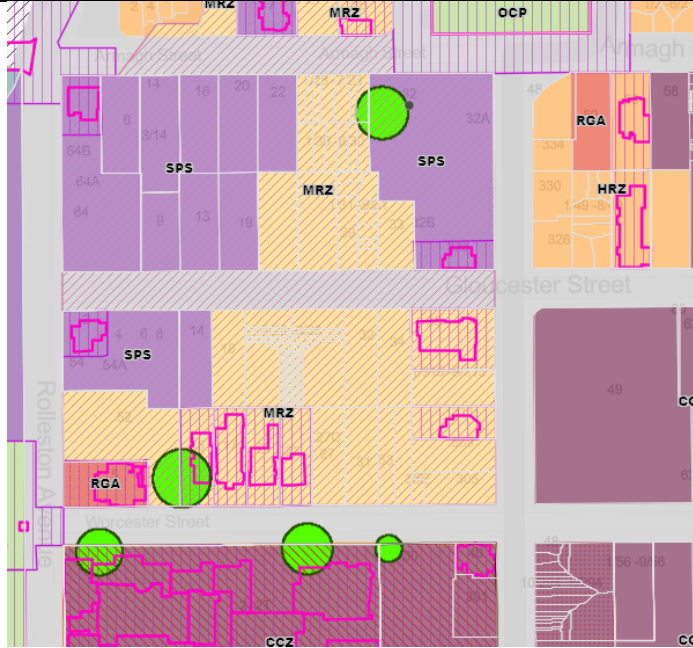
No.	Provision	Position	Submission	Relief Sought
	(Matters of discretion-upper floor setbacks, tower dimension and coverage)		<p>These changes undermine the enablement of building height as directed by the NPS-UD and they are not otherwise necessary or appropriate for the purposes of promoting intensification. The rule change will also impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty.</p> <p>Accordingly, this amendment should be deleted.</p>	
3.	<p>Rule 15.14.3.36</p> <p>(Matters of discretion-Tower Roof Modulation)</p>	Oppose	<p>The proposed new matters of discretion in this rule are unnecessary, insofar that they introduce matters that are otherwise within the scope of the operative matters in Rule 15.14.3.1 clause (a).</p> <p>These changes undermine the enablement of building height as directed by the NPS-UD and they are not otherwise necessary or appropriate for the purposes of promoting intensification. The rule change will also impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty.</p> <p>Accordingly, this amendment should be deleted.</p>	Delete Rule 15.14.3.36 in its entirety.

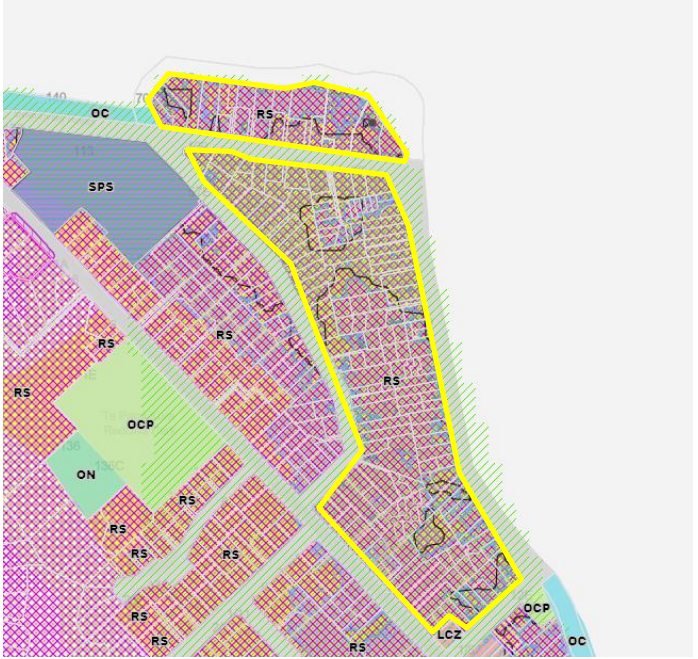
No.	Provision	Position	Submission	Relief Sought
4.	Rule 15.14.3.37 (Matters of discretion- Glazing	Oppose	<p>The proposed new matters of discretion relate to rules that are otherwise opposed, and as such these should be deleted.</p> <p>These changes undermine the enablement of building height as directed by the NPS-UD and they are not otherwise necessary or appropriate for the purposes of promoting intensification. The rule change will also impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty.</p> <p>Accordingly, this amendment should be deleted.</p>	Delete Rule 15.14.3.37 in its entirety.
5.	Rule 15.14.3.38 (Matters of discretion- outlook space)	Oppose	<p>These changes are not necessary or appropriate for the purposes of promoting intensification. The rule change will also impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty.</p> <p>Accordingly, this amendment should be deleted.</p>	Delete Rule 15.14.3.38 in its entirety.
6.	Rule 15.14.3.39 (Matters of discretion- Wind	Oppose	<p>The proposed new matters of discretion relate to rules that are otherwise opposed, and as such these should be deleted.</p> <p>These changes undermine the enablement of building height as directed by the NPS-UD and they are not otherwise necessary or</p>	Delete Rule 15.14.3.39 in its entirety.

No.	Provision	Position	Submission	Relief Sought
			<p>appropriate for the purposes of promoting intensification. The rule change will also impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty.</p> <p>Accordingly, this amendment should be deleted.</p>	
7.	<p>Rule 15.14.5.2</p> <p>(Matters of discretion-Buildings at 136 Barbadoes Street)</p>	Support in part	<p>Consistent with the submission on the corresponding policy (15.2.5.1, which specifically refers to 'Cathedrals in Central City') and rule 15.12.1.2 C1, this provision should be amended to recognise and provide for the establishment of a new cathedral for the Catholic Diocese of Christchurch within the city block bounded by Colombo / Armagh / Manchester Streets and Oxford Terrace.</p> <p>Given that the purpose of PC14 is to support intensification, amendments to the rule to support the establishment of the new cathedral (and its design, form and function requirements) on its central city site is appropriate.</p>	<p>Amend Rule 15.14.5.2 as follows:</p> <p><u>15.14.5.2 The Building of a new Catholic Cathedral Buildings at 136 Barbadoes Street</u></p> <p><i>a. The extent to which the building <u>of a new Catholic Cathedral within the city block bounded by Colombo / Armagh / Manchester Streets and Oxford Terrace...</u></i></p>

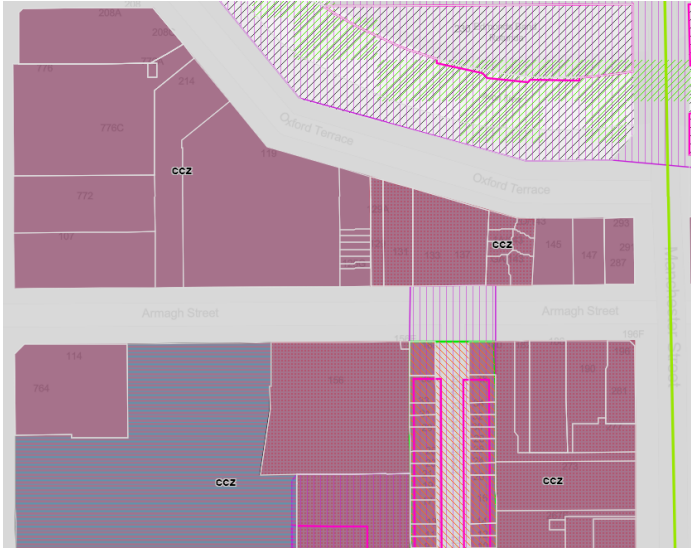
No.	Provision	Position	Submission	Relief Sought
Planning Maps / Rezoning				
1.	Planning maps	Support	For the reasons expressed in the submission above, the submitter supports the LCZ zoning of the properties on the corner of Merrin Street and Withells Road (Avonhead shopping centre). For the avoidance of doubt, the submitter seeks that policy 15.2.2.1 be amended to recognise this as a 'large' LCZ.	Retain the LCZ shown for the Avonhead Shopping Centre on the Withells/Merrin corner as indicated below. 
2.	Planning maps	Oppose in part	For the reasons expressed in the submission above, the submitter considers the property at 332 Oxford Terrace should be rezoned CCMUZ, accounting for the attributes of the land/locality, its historical use, and in order to meet the requirements of the NPS-UD.	Amend the planning maps to rezone the properties at 332 Oxford Terrace as Commercial Central City Mixed Use, as indicated below (in blue outline).

No.	Provision	Position	Submission	Relief Sought
				
3.	Planning maps	Oppose in part	<p>For the reasons expressed in the submission above, the submitter supports the zoning of the land at 32 Armagh Street, but opposes the overlays applying to the land (as indicated in the figure included with this submission point).</p> <p>Specifically, the submitter:</p> <ul style="list-style-type: none"> a. Opposes the heritage setting and heritage item identified on the planning maps; 	<p>Amend the planning maps to remove the following features identified on the planning maps at 32 Armagh Street (as indicated below):</p> <ul style="list-style-type: none"> a. The heritage setting and heritage item; b. 2x scheduled trees (including the qualifying matter tree); c. The residential heritage area overlay applying to the land and surrounding area.

No.	Provision	Position	Submission	Relief Sought
			<p>b. Opposes the 2x scheduled trees (including the qualifying matter tree) identified on the planning maps;</p> <p>c. Opposes the residential heritage area overlay applying to the land and surrounding area.</p>	
4.	Planning maps	Oppose in part	<p>For the reasons expressed in the submission above, the submitter opposes the zoning and overlays applying to the land either side of Beachville Road in Redcliffs (as indicated in the figure included with this submission point).</p> <p>Specifically, the submitter:</p> <p>d. Opposes Residential Suburban zoning, on the basis that the land provides an attractive and</p>	<p>Amend the planning maps in respect of the land identified below to:</p> <ol style="list-style-type: none"> 1. Rezone the land as MRZ. 2. Remove the following overlays: <ol style="list-style-type: none"> a. Low Public Transport Accessibility, b. Coastal Hazard Medium and High Risk Management Area, c. High Floodplain Hazard Management Area,

No.	Provision	Position	Submission	Relief Sought
			<p>appropriate location for medium density development. The attributes of the land are comparable to the MRZ adjacent to The Esplanade in Sumner. Accordingly, the submitter seeks that the land be rezoned MRZ.</p> <p>e. Opposes the Low Public Transport Accessibility overlay, noting this area has convenient access to public transport connections on Main Road. The submitter generally opposes this overlay, noting that any current deficiencies in accessibility to public transport can be remedied over time to meet demands (e.g. through additional public investment, technological solutions, ride sharing such as Uber Pool, etc) and should not be relied on as a basis to disenable development or intensification.</p> <p>f. Opposes the Coastal Hazard Medium and High Risk Management Area, High Floodplain Hazard Management Area and Tsunami Management Area Overlays and Qualifying Matters, generally, and specifically for the land identified. The submitter considers that these overlays and QMs are overly and unreasonably</p>	<p>d. Tsunami Management Area, and</p> <p>e. Sites of Cultural Significance.</p> 

No.	Provision	Position	Submission	Relief Sought
			<p>conservative and they inappropriately preclude or constrain development capacity and intensification that can incorporate measures to avoid or manage natural hazards (minimum floor levels, building resilience measures, etc).</p> <p>g. Opposes the Sites of Cultural Significance overlay to the extent this is relied on as a Qualifying Matter, generally and specifically in relation to the land identified in this submission. Whilst the submitter acknowledges the need to protect or appropriately manage areas or sites of cultural significance, they do not consider this should not preclude or constrain intensification that can incorporate appropriate measures to avoid effects on these sites.</p>	
5.	Planning maps	Oppose in part	<p>For the reasons expressed in the submission above, the submitter supports the zoning of the land bounded by Oxford Terrace, Manchester Street, Armagh Street, and Colombo Street, but opposes a number of overlays applying to the land or adjacent land.</p> <p>Specifically, the submitter:</p>	<p>Amend the planning maps applying to the land bounded by Oxford Terrace, Manchester Street, Armagh Street, and Colombo Street, as follows::</p> <p>a. Delete the extent of the heritage setting for New Regent Street (being heritage setting 336 associated with heritage item 404 in Appendix 9.3.7.2 schedule), so that it ends at the southern most edge of Armagh Street,</p>

No.	Provision	Position	Submission	Relief Sought
			<p>a. Opposes the extent of the heritage setting for New Regent Street (being heritage setting 336 associated with heritage item 404 in Appendix 9.3.7.2 schedule) and considers the setting should end at the southern most edge of Armagh Street, being where New Regent Street meets Armagh Street.</p> <p>b. Opposes the Central City Heritage Interface overlay, where this applies to the to the site.</p>	<p>being where New Regent Street meets Armagh Street.</p> <p>b. Delete the Central City Heritage Interface overlay.</p> 

Details of submitter No: 823 - Jo Appleyard

Submitter:	Jo Appleyard
Submitter Address:	Level 5, PwC Centre 60 Cashel Street, New Zealand, 8140
Organisation:	The Catholic Diocese of Christchurch
Behalf of:	The Catholic Diocese of Christchurch

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 16/05/2023

First name: Jo

Last name: Appleyard

Organisation:

The Catholic Diocese of Christchurch

Preferred method of contact Email

Postal address:

Email:

Daytime Phone:

Would you like to present your submission in person at a hearing?

Yes

Additional requirements for hearing:

Person of interest declaration: I am *

Explain the grounds for saying you come within category (a) or (b) above:

Note to person making further submission:

- A further submission can only support or oppose an original submission listed in the summary. It is not an opportunity to make a fresh submission on matters not raised in the submission.
- A copy of your further submission must be served on the original submitter within 5 working days of making the further submission to the Council

Attached Documents

Name

PC14 Submission - Catholic Diocese 3461-4216-7587 

Form 5

**SUBMISSION ON PUBLICLY NOTIFIED PROPOSAL FOR POLICY STATEMENT OR
PLAN, CHANGE OR VARIATION**

Clause 6 of Schedule 1, Resource Management Act 1991

To Christchurch City Council

Name of submitter: The Catholic Diocese of Christchurch (*the Diocese*)

- 1 This is a submission on the proposed plan change 14 (PC14) to the Christchurch District Plan (the *District Plan*).
- 2 The Diocese could not gain an advantage in trade competition through this submission.
- 3 The Diocese's submission relates to the whole of PC14. The specific relief sought by the Diocese is set out at **Appendix 1** and the key points elaborated on below.
- 4 The Diocese wishes to be heard in support of the submission.
- 5 If others make a similar submission, the Diocese will consider presenting a joint case with them at a hearing.

PROPOSED CHANGES TO THE RESIDENTIAL ZONE CHAPTERS

- 6 By way of general feedback, the Diocese considers that PC14 fails to enable intensification, residential activity and building heights in the manner envisaged by the NPS-UD and Resource Management Act 1991.
- 7 More specifically, to the extent that greater provision for building heights and/or residential activity has been provided for throughout the City by way of the proposed changes, this is countered by the corresponding amendments to policy provisions, rules, activity status, and assessment matters which have the effect of introducing greater time, cost and uncertainty to projects.
- 8 In the Diocese's views, such changes undermine the intensification sought by the RMA and NPS-UD and they are not otherwise necessary or appropriate to promote intensification in a manner consistent with the stated purpose of PC14. Moreover, such changes are inconsistent with strategic directions in Chapter 3, and objective 3.3.2 in particular which requires (with our emphasis):

3.3.2 Objective - Clarity of language and efficiency

a. The District Plan, through its preparation, change, interpretation and implementation:

i. Minimises:

A. transaction costs and reliance on resource consent processes; and

B. the number, extent, and prescriptiveness of development controls and design standards in the rules, in order to encourage innovation and choice; and

C. the requirements for notification and written approval; and

ii. Sets objectives and policies that clearly state the outcomes intended; and

iii. Uses clear, concise language so that the District Plan is easy to understand and use.

- 9 In simple terms, the additional regulatory controls proposed are not enabling.
- 10 In the Diocese's views, greater use should be made of permitted or controlled activity status; and caution should be exercised in the drafting of policies and assessment criteria to ensure such provisions are clear, certain and are ultimately enabling and supportive of intensification.

PROPOSED CHANGES TO THE COMMERCIAL ZONE CHAPTER

- 11 In general terms, the proposed changes to commercial zones fail to 'enable' intensification in the manner envisaged by the NPS-UD, and policy 3 especially. Again, such changes are also inconsistent with strategic objective 3.3.2.
- 12 To the extent that intensification is provided for by PC14 (e.g. increased building heights), this is countered by the corresponding amendments to policy provisions, rules, activity status, and assessment matters which have the effect of 'disenabling' or further constraining development and adding time, cost and uncertainty to projects.
- 13 Such changes undermine the intensification sought by the NPS-UD and they are not otherwise necessary or appropriate to promote intensification in a manner consistent with the stated purpose of PC14.
- 14 In simple terms, the additional regulatory controls proposed are not enabling.
- 15 In the Diocese's views, greater use should be made of permitted or controlled activity status; and caution should be exercised in the drafting of policies and assessment criteria to ensure such provisions are clear, certain and are ultimately enabling and supportive of intensification.

FINANCIAL CONTRIBUTIONS POLICY

- 16 The proposed tree canopy cover and financial contributions provisions are unworkable and unreasonable.
- 17 The provisions are difficult to understand and create considerable uncertainty. For example:

- 17.1 If trees are retained over and above the 20% cover threshold will a financial credit be provided to the applicant?
- 17.2 It is not clear who would be qualified to undertake the assessment of the canopy cover.
- 17.3 The proposed definitions of PC14 introduce the definition of a 'hedge' with specific reference to the tree canopy cover and financial contributions provisions, yet those provisions do not utilise that term.
- 17.4 If a stormwater basin is heavily planted in native shrubs, should this receive a credit as plants (and not just trees) also provide for carbon sequestration?
- 17.5 How will the timing of assessment work in relation to consenting processes? For greenfield subdivisions for example, landscape plans are often not completed until after resource consent is issued.
- 18 The canopy cover provisions would be difficult to enforce. If canopy cover is determined as acceptable at the time of resource consent and 10 years or 15 years later one or some of those trees are cut down, who monitors and enforces that requirement? Does Council have the staff resources to maintain that level of monitoring across wide swathes of the city?
- 19 Councils increasingly seek a reduction in reserve areas within greenfield subdivisions, on the basis of ongoing maintenance costs for the Council. It would be very difficult to achieve a 20% of net site area coverage in most greenfield subdivisions, noting that those reserve areas are also required for other purposes such as playground and open grass for play areas, that are incompatible with extensive tree canopy cover.
- 20 The provisions require 20% of the net site area adjacent to road corridors to contain tree cover. Accommodating tree cover typically necessitates wider road corridors. Wider road corridors reduces land available for housing, in direct conflict with the existing District Plan provisions stipulating a minimum density of 15 hh/ha must be achieved for greenfield subdivision areas, and more generally the NPS-UD.
- 21 The cost implications of not achieving tree cover are considerable and, given the Diocese does not consider the 20% cover is achievable, will add further to development costs that are then passed onto purchasers.
- 22 The implications of this proposed policy are significant from an economic perspective and must be adequately justified by the Council. As it stands, the Diocese do not consider the Council has done this and therefore the proposed financial contributions policy should be deleted in its entirety.

SITE SPECIFIC MATTERS

- 23 The Diocese is considering its options for the location of a new Catholic cathedral to be constructed in Central Christchurch. Currently, the Diocese has three potential sites being considered for this. The Diocese seek a rule be included in PC14 that

would enable the construction of such a cathedral on one of these sites. The proposed wording for this rule is set out in **Appendix 1**.

Armagh Street Site

- 24 The Diocese have interests in the land bounded by Oxford Terrace, Manchester Street, Armagh Street, and Colombo Street as shown below:



Figure 1: Approximate outline of Armagh Street Site shown in yellow

- 25 This location is one of three potential sites for the construction of a new Catholic Cathedral.
- 26 The Diocese support the zoning of this site as City Centre Zone. However, there are a number of aspects of PC14 that the Diocese oppose in respect of the Armagh Street Site:

The New Regent Street heritage setting

- 26.1 The Diocese oppose the extent of the heritage setting for New Regent Street (being heritage setting 336 associated with heritage item 404 in Appendix 9.3.7.2 schedule).
- 26.2 The Diocese oppose the identification of this heritage setting to the northern most edge of Armagh Street and consider the setting should end at the southern most edge of Armagh Street, being where New Regent Street meets Armagh Street. Among other reasons, the Diocese consider that the modern buildings fronting Armagh Street at either end of New Regent Street or the Armagh Street road reserve have no apparent heritage values that warrant a heritage setting.
- 26.3 There is no basis for why this heritage setting extends as far as it does.

Central City Heritage Interface

- 26.4 Part of this site is subject to the proposed 'Central City Heritage Interface' overlay. This overlay is strongly opposed by the Diocese. The Diocese considers there is no basis or justification for such an overlay over the Armagh Street Site. Among other reasons, the Diocese notes that the site has no identified heritage values and is surrounded by roads, that provide an adequate interface to and separation from other sites in the area, including those which may have heritage value.
- 26.5 It is also unclear why there are no objectives or policies introduced into the Historic Heritage chapter of the plan by PC14 in respect of these heritage interface sites. This gives very little direction to plan users as to their utility and/or relevance.
- 26.6 On this basis, the Diocese therefore seek:
- (a) the heritage interface overlays in general (maps and any associated provisions) are removed from PC14; or
 - (b) the Central City Heritage Interface relating to New Regent Street is removed; or
 - (c) at the very least, the Central City Heritage Interface is removed from the above site.

The Barbadoes Street Site

- 27 The Diocese have interests in the land bounded by Ferry Road, Moorhouse Avenue, and Barbadoes Street as shown below:



Figure 2: Approximate outline of Barbadoes Street Site shown in yellow

- 28 This location is one of three potential sites for the construction of a new Catholic Cathedral.
- 29 The Diocese support the underlying zoning of this site as Central City Mixed Use Zone (CCMUZ). However, the Diocese oppose the following with respect to the Barbadoes Street Site:

Incorrect mapping of heritage item

- 29.1 136 Barbadoes Street previously housed the Cathedral of the Blessed Sacrament (the *Cathedral*), a highly significant heritage item (item number 46), before it was demolished pursuant to a section 38 notice issued by the Canterbury Earthquake Recover Authority.
- 29.2 PC14 proposes to remove the Cathedral from the Schedule of Significant Historic Heritage in Appendix 9.3.7.2 of the District Plan. The Diocese support this change on the basis that the Cathedral has now been demolished and the site no longer contains any heritage items or values.

29.3 However, the Cathedral is still showing as a heritage item in the Council's electronic proposed map¹ for PC14 (as well as PC13). The Diocese consider it is likely that this is an administrative error where the removal of the listing in the plan was not properly reflected in the electronic planning maps.

29.4 Given both PC13 and PC14 proposes to remove the heritage listing for the Cathedral, it is no longer appropriate for any of the planning maps to show a heritage item on the site. The Diocese therefore seek that the heritage listing shown at 136 Barbadoes Street is removed from the electronic planning map.

The Manchester Street Site

- 30 The Diocese have interests in the land located at 373 and 375 Manchester Street as shown below:



Figure 3: Approximate outline of Manchester Street Site shown in yellow

- 31 This location is one of three potential sites for the construction of a new Catholic Cathedral.

¹<https://christchurchcity.maps.arcgis.com/apps/webappviewer/index.html?id=ad65227f17a8492aa9191f4c665a3d0a#propertymaps>

- 32 The Diocese oppose the underlying High Density Residential Zone (*HRZ*) and seek that the Manchester Street Site be rezoned CCMUZ. CCMUZ land is located directly opposite the Diocese's site on Manchester Street. Rezoning the Manchester Street Site to CCMUZ will provide for a contiguous enlargement of the current CCMUZ on Manchester Street. There are also other pockets of CCMUZ in the wider vicinity of the Manchester Street Site that are similarly sized and the rezoning would therefore be consistent with the CCMUZ zoning pattern.
- 33 The Diocese wishes to retain the current Specific Purpose (School) zoning that currently sites on the Manchester Street site. The underlying zoning is relevant in the event that the site is redeveloped for other purposes, including for a new Cathedral. A spiritual facility the size of a Cathedral would be a non-complying activity under the HRZ provisions, and for this reason CCMUZ is sought instead.

Signed for and on behalf of the Catholic Diocese of Christchurch by its solicitors and authorised agents Chapman Tripp



Jo Appleyard
Partner
12 May 2023

Address for service of submitter:

The Catholic Diocese of Christchurch
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Chapman Tripp



APPENDIX 1

No.	Provision	Position	Submission	Relief Sought
Chapter 1 Introduction				
1.	General feedback – 1.3.4.2	Neutral	PC14 proposes explanatory text regarding the potential infrastructure constraints for development that is enabled by the District Plan and PC14. The submitter considers this text is ultimately helpful to readers of the District Plan but is concerned at this possibility eventuating.	Retain as notified

No.	Provision	Position	Submission	Relief Sought
Chapter 2 Abbreviations and definitions				
1.	Definition - Accessory building	Oppose	<p>PC14 unnecessarily provides a distinct definition of this term for the Medium Density Residential and High Density Residential zones. This will provide conflict between zones, confusion to users of the plan, and unintended consequences including a likelihood of unnecessary and costly resource consent applications.</p> <p>For example, attached accessory buildings may require consent where they would otherwise be permitted in other zones (e.g.</p>	Retain status quo.

No.	Provision	Position	Submission	Relief Sought
			attached garages, solar heating devices, etc).	
2.	Definition of 'Alteration'	Oppose	The definition has the effect of meaning that any change, modification or addition to a heritage item, heritage setting or heritage fabric, or a building in a heritage area will constitute an 'alteration' and trigger corresponding rules and consent requirements, irrespective of whether it impacts on heritage fabric. This will create unnecessary, costly and inefficient consent requirements, and provide no benefits in respect of heritage.	Retain status quo.
3.	Definition - Building	Oppose	PC14 unnecessarily provides a distinct definition of this term for the Medium Density Residential and High Density Residential zones. This will provide conflict between zones, confusion to users of the plan, and unintended consequences including a likelihood of unnecessary and costly resource consent applications (e.g. for swimming pools, decks, balconies, etc).	Retain status quo.
4.	Definition - Building Base	Oppose	This definition is opposed to the extent that it relates to the constraint of building heights, in a manner that is inconsistent with the NPS-UD and is not otherwise necessary or appropriate for the purposes of promoting intensification.	Delete

No.	Provision	Position	Submission	Relief Sought
5.	Definition - Building Tower	Oppose	This definition is opposed to the extent that it relates to the constraint of building heights, in a manner that is inconsistent with the NPS-UD and is not otherwise necessary or appropriate for the purposes of promoting intensification.	Delete
6.	Definition - Building Coverage	Oppose in part	The definition refers to 'building footprint' however that term is not coloured/underlined so as to refer to the corresponding definition.	Amend such that the term 'building footprint' is marked with reference to the corresponding definition of this term.
7.	Definition - Building Footprint	Oppose in part	The definition is not clear, insofar that it refers to refers to 'any section of any of those buildings that extends out beyond the ground floor level limits of the building and overhangs the ground'.	Amend to provide greater clarity.
8.	Definition of 'Contributory building'	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Regardless, the proposed definition is vague and provides little certainty as to whether buildings would or would not constitute a contributory building.	Delete.
9.	Definition - Coverage	Oppose	PC14 unnecessarily provides a distinct definition of this term for the Medium Density Residential and High Density Residential zones. This will provide conflict	Retain status quo.

No.	Provision	Position	Submission	Relief Sought
			between zones, confusion to users of the plan, and unintended consequences including a likelihood of unnecessary and costly resource consent applications.	
10.	Definition of 'Defining building'	Oppose	<p>Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission.</p> <p>Regardless, the proposed definition is vague and provides little certainty as to whether buildings would or would not constitute a defining building.</p>	Delete.
11.	Definition of 'Demolition'	Oppose	The amended definition has the effect of meaning that any destruction of a non-substantial part of a building constitutes 'demolition' and triggers corresponding rules and consent requirements. This will create unnecessary, costly and inefficient consent requirements for inconsequential partial demolition work, create conflict with the definition of 'alteration', and provide no benefits in respect of heritage.	Retain status quo.
12.	Definition – Development site	Support	The proposed definition sensibly enables sites to be defined and assessed for the purposes of compliance, notwithstanding that they may not fall within the mandatory definition of 'site' under the National Planning Standards.	Retain as notified.

No.	Provision	Position	Submission	Relief Sought
13.	Definition – Dripline	Oppose	This definition is deleted, evidently, on the basis that it will be replaced by a new definition of 'Tree protection zone radius'. The dripline definition is preferred on the basis that it is more readily understood.	Retain status quo.
14.	Definition – Fine grain	Oppose	The definition is highly subjective, lacks clarity and specificity, and is open to conflicting interpretation.	Delete.
15.	Definition – Ground level	Oppose	PC14 unnecessarily provides a distinct definition of this term for the Medium Density Residential and High Density Residential zones. This will provide conflict between zones, confusion to users of the plan, and unintended consequences including a likelihood of unnecessary and costly resource consent applications.	Retain status quo.
16.	Definition – Gust Equivalent Mean (GEM)	Oppose	The definition is highly subjective, lacks clarity and specificity, and is open to conflicting interpretation.	Delete.
17.	Definition – Habitable room	Oppose	The definition is highly subjective, lacks clarity and specificity, and is open to conflicting interpretation insofar that it refers to 'a similarly occupied room'.	Delete.

No.	Provision	Position	Submission	Relief Sought
18.	Definition – Heat island	Oppose	The definition is highly subjective, lacks clarity and specificity, and is open to conflicting interpretation.	Delete.
19.	Definition – Hedge	Oppose	The definition is highly subjective, lacks clarity and specificity, and is open to conflicting interpretation.	Delete.
20.	Definition – Height	Oppose	PC14 unnecessarily provides a distinct definition of this term for the Medium Density Residential and High Density Residential zones. This will provide conflict between zones, confusion to users of the plan, and unintended consequences including a likelihood of unnecessary and costly resource consent applications.	Retain status quo.
21.	Definition of 'Heritage setting'	Oppose	The amended definition removes the wording that a setting ' <i>together with the associated heritage item, has met the significance threshold</i> ' and instead states that ' <i>Heritage settings have not been assessed as meeting the significance threshold for scheduling</i> '. The submitter considers that heritage settings that do not meet the significance threshold for scheduling should not be listed, with associated regulatory requirements.	Retain status quo.

No.	Provision	Position	Submission	Relief Sought
22.	Definition of 'Heritage Building Code works'	Supports	The amended definition provides greater clarity and certainty, and sensibly provides for insulation and glazing upgrades.	Retain as proposed.
23.	Definition – Human scale	Oppose	The definition is highly subjective, lacks clarity and specificity, and is open to conflicting interpretation.	Delete
24.	Definition of 'Intrusive building or site'	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Regardless, the proposed definition is vague and provides little certainty as to whether buildings or sites would or would not be intrusive.	Delete.
25.	Definition of 'Neutral building or site'	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Regardless, the proposed definition is vague and provides little certainty as to whether buildings or sites would or would not be categorised as neutral.	Delete.
26.	Definition – Outdoor living space	Support	The definition provides greater clarity and certainty than the status quo.	Retain as notified.

No.	Provision	Position	Submission	Relief Sought
27.	Definition – Pedestrian access	Oppose	The definition (insofar as it refers to a 'dedicated pathway') precludes other forms of pedestrian access or shared spaces that adequately serve the same purpose.	Amend definition as follows: A dedicated pathway that provides access for pedestrians from the street to a residential unit and to any parking area for that residential unit
28.	Definition – Perimeter block development	Oppose	The definition is highly subjective, lacks clarity and specificity, and is open to conflicting interpretation.	Delete
29.	Definition of 'Reconstruction'	Supports	The amended definition provides greater clarity and certainty, and sensibly provides for additional forms of reconstruction.	Retain as proposed.
30.	Definition of 'Relocation'	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. As such, the submitter opposes the definition of relocation insofar that it relates to heritage areas. Further, the submitter opposes the deletion of the exclusions in (a) and (b) that otherwise sensibly exclude temporary relocation or realignment works.	Retain status quo.
31.	Definition of 'Repairs'	Supports	The amended definition provides greater clarity and certainty, and sensibly provides for additional forms of repairs.	Retain as proposed.

No.	Provision	Position	Submission	Relief Sought
32.	Definition – Residential unit	Oppose	PC14 unnecessarily provides a distinct definition of this term for the Medium Density Residential and High Density Residential zones. This will provide conflict between zones, confusion to users of the plan, and unintended consequences including a likelihood of unnecessary and costly resource consent applications.	Retain status quo.
33.	Definition of 'Restoration'	Supports	The amended definition provides greater clarity and certainty.	Retain as proposed.
34.	Definition – Site	Oppose	<p>PC14 unnecessarily provides a distinct definition of this term for the Medium Density Residential and High Density Residential zones. This will provide conflict between zones, confusion to users of the plan, and unintended consequences including a likelihood of unnecessary and costly resource consent applications.</p> <p>As noted above, the submitter supports the definition 'development site' and the use of this term in relevant rules.</p>	Retain status quo.
35.	Definition – Tree	Oppose	The definition is highly subjective, lacks clarity and specificity, and is open to conflicting interpretation.	Delete or alternatively amend to specify a potential height of at least 3m.

No.	Provision	Position	Submission	Relief Sought
			Furthermore, the definition is unreasonably restrictive insofar that it specifies a minimum potential height of 5m.	
36.	Definition – Tree canopy cover	Oppose	The definition is very broad and relies on tree cover achieving expected growth over a 20 year time frame. It is unclear how the Council intends to cover the cost of enforcement over a 20+ year time frame for all new developments.	Delete
37.	Definition – Tree protection zone radius	Oppose	The definition is complex and is open to conflicting interpretation. The definition of 'dripline' is preferred.	Delete

No.	Provision	Position	Submission	Relief Sought
Chapter 3 Strategic Directions				
1.	Clause 3.1(v) Introduction	Support	The additional text appropriately recognises the need to <i>'Facilitate an increase in the supply of housing, and provide for a wide range of housing types and locations, to give effect to the [relevant statutory] provisions enabling development...'</i>	Retain as notified.

No.	Provision	Position	Submission	Relief Sought
2.	Objective 3.3.2	Support	The objective is appropriate to ensure the effective and efficient preparation, change, interpretation and implementation of the District Plan.	Retain as notified.
3.	Objective 3.3.7	Oppose	The proposed wording in clauses (a)(i)-(iv) of this objective seeks to define a 'well-functioning urban environment' in a way that does not necessarily reflect, and risks narrowly framing, policy 1 of the NPS-UD. Whilst some aspects of these clauses are appropriate, others are not.	Amend by deleting the test following the words 'into the future' as follows: <i>3.3.7 Objective – Well-functioning urban environment</i> <i>a. A well-functioning urban environment that enables all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future; including by recognising and providing for;</i> <i>i. Within commercial and residential zones</i> <i>...</i> <i>iv. The benefits of urban environments that support reductions in greenhouse gas emissions; and are resilient to the current and future effects of climate change.</i>
4.	Objective 3.3.8(viii)	Oppose	The proposed wording in clauses (viii) is not consistent with the requirements of NPS-UD policy 1. As worded, the proposed policy may require outcomes that are not practicable and are not required by NPS-UD policy 1.	Amend as follows: <i>viii. Has good Improves overall accessibility <u>for all and connectivity (including through opportunities for walking, cycling and public transport)</u> for people <u>between housing, jobs, community services, natural spaces, and open spaces including by way of public or active transport, transport (including opportunities</u></i>

No.	Provision	Position	Submission	Relief Sought
				for walking, cycling and public transport) and services; and
5.	Objective 3.3.10(ii)(E)	Oppose	<p>Consistent with its submissions on sub chapter 6.10A, the submitter considers the provisions relating to tree canopy cover and financial contributions in their entirety are unworkable and onerous.</p> <p>The submitter further notes, that if the Council are wanting to enhance and grow the City's biodiversity and amenity this should also go hand in hand with Council agreeing to accept larger and more frequent recreational reserve areas. Over the past 5 – 7 years Council have pushed back against numerous developer proposals to increase reserve areas which would assist in meeting these proposed objectives.</p>	Delete.

No.	Provision	Position	Submission	Relief Sought
Chapter 6 General Rules & Procedures, Sub Chapter 6.1A Qualifying Matters				
1.	6.1A.1, Table 1 Qualifying Matters	Oppose	<p>Whilst the rationale for qualifying matters expressed in 6.1A.1(a) and (b) is acknowledged, a number of the matters identified in Table 1 are not warranted,</p>	Delete or otherwise amend Table 1 and the extent of Qualifying Matters in a manner consistent with the relief sought by the submitter on other provisions in PC14.

No.	Provision	Position	Submission	Relief Sought
			<p>accounting for the relevant matters in sections 77I or 77O.</p> <p>Among other reasons, a number of qualifying matters are considered to be less enabling of development to more than the extent necessary to accommodate the identified qualifying matters; and/or such matters have not been adequately evaluated and justified accounting for the costs imposed and the limitations on development capacity that is otherwise sought by the NPS-UD.</p> <p>The submitter is particularly concerned with qualifying matters relating to:</p> <p>(a) Heritage areas, items and their settings – noting the operative District Plan provisions relating to heritage adequately provide for such matters.</p> <p>(b) Natural hazards – noting operative District Plan provisions and the submission points above regarding proposed amendments to chapter 5.</p> <p>(c) Residential zones</p> <p>(d) Commercial zones</p>	

No.	Provision	Position	Submission	Relief Sought
Chapter 6 General Rules & Procedures, Sub Chapter 6.10A Tree Canopy Cover and Financial Contributions				
1.	General/all	Oppose	The provisions in their entirety concerning tree canopy cover and financial contributions (including related definitions and amendments to strategic objectives) are unworkable and onerous.	Delete all of the financial contributions draft provisions in their entirety.
2.	6.10A.1	Oppose	The provision begs the question: If trees are retained over and above the 20% cover threshold will a financial credit be provided to the applicant?	
3.	6.10A.1c	Oppose	Greenfield subdivision does not generally cause the loss of tree canopy cover, there is generally a net gain in canopy cover as such subdivision is typically over open paddocks. Furthermore, Council itself has been responsible for a reduced canopy cover through the adoption of policies of density, road widths, off-sets from infrastructure, reduction in reserves to vest, all based around maintenance obligations and council budgets.	
4.	6.10A.1d	Oppose	There is currently no "Urban Forest Plan" setting out the Council target. Therefore, how is anyone expected to know if this is even realistic? This section also refers to financial contributions to cover the cost of tree pits construction within road corridors. This should exclude Greenfield sites where developers are already required as part of their	

No.	Provision	Position	Submission	Relief Sought
			subdivision consent to include street trees within new road corridors.	
5.	Objective 6.10A.2.1	Oppose	<p>For the reasons expressed in the submission points above, the objective is generally opposed.</p> <p>Otherwise, the objective fails to account for the particular characteristics of residential activity, its location or other contextual matters that may make this objective unachievable or inappropriate. For example, residential activities within multi-level apartment buildings in the core of the Central City could not practicably '[maintain] <i>existing trees and/or</i> [plant] <i>new trees as part of the development</i>', as required by the objective.</p>	
6.	Policy 6.10A.2.1.1	Oppose	For the same reasons expressed in regards Objective 6.10A.2.1 and otherwise noting the practical difficulties of monitoring and enforcing the tree canopy percentages over time, this policy is opposed.	
7.	Policy 6.10A.2.1.2	Oppose	<p>For the same reasons expressed in regards to the submission points above, the policy is opposed.</p> <p>Among other things, the maintenance of required tree canopy is impractical to monitor and enforce and requiring financial contributions from those who do not meet the requirements but not from those who may provide the canopy and subsequently remove it. This policy is inequitable and unworkable.</p>	

No.	Provision	Position	Submission	Relief Sought
8.	Policy 6.10A.2.1.3	Oppose	<p>The requirements for tree planting (in terms of location, soil volume, etc) are unnecessarily and unreasonably prescriptive and remove property owners' reasonable freedom and choice to landscape their properties as they choose. Moreover, such requirements are difficult to monitor and enforce on an ongoing basis (e.g. as new owners or tenants choose to re-landscape) and are unnecessary accounting for the control or discretion in regards to these matters where trees are expressly required through resource consent processes.</p> <p>Consent notices in respect of tree planting are an unreasonable and onerous requirement, and are considered impracticable for enforcing residential landscaping which is commonly and regularly altered to reflect changing needs and preferences over time. Consent notices are likely to be overlooked or ignored, or impose costly and inefficient regulatory processes to retrospectively address landscaping works in breach of consent notices.</p> <p>Policies relating to trees in road reserve are unnecessary, noting that such trees can be adequately managed by Council in its capacity as road controlling authority.</p>	
9.	6.10A.3	Oppose	<p>The provisions in this section are generally opposed. Further, clause (c) is considered unclear, insofar as providing 'guidance' on tree species and other 'requirements' and whether these external documents will essentially be imposed as rules.</p>	

No.	Provision	Position	Submission	Relief Sought
10.	6.10A.4	Oppose	The rules are opposed in their entirety for the reasons expressed above.	
11.	6.10A.4(a)	Oppose	The explanatory note setting out the application of the rules is arbitrary, unclear and open to interpretation. Among other concerns, it requires a judgement of whether subdivision or development is 'able to contain a ground floor residential unit' irrespective of whether that is proposed, commercially viable, or otherwise.	
12.	6.10.A.4.1	Oppose	The rules are opposed in their entirety for the reasons expressed above and noting they are arbitrary, unclear and open to interpretation. Among other concerns, the rules apply to 'any residential development except for extensions or accessory buildings...', which might capture non-built improvements (as residential development), such as hard or soft landscaping works, internal alterations, first floor additions, etc.	
13.	6.10.A.4.2	Oppose	The rules are opposed in their entirety for the reasons expressed above and noting they are arbitrary, unclear and open to interpretation and debate. Aside from the monetary costs imposed by the rule, the administration of the rule imposes significant costs insofar as it requires an independent registered valuation. The rules are clearly in conflict with strategic objective 3.3.2.	

No.	Provision	Position	Submission	Relief Sought
14.	6.10.A.4.2.3	Oppose	Consent notices in respect of tree planting are an unreasonable and onerous requirement, and are considered impracticable for enforcing residential landscaping which is commonly and regularly altered to reflect changing needs and preferences over time. Consent notices are likely to be overlooked or ignored, or impose costly and inefficient regulatory processes to retrospectively address landscaping works in breach of consent notices.	

No.	Provision	Position	Submission	Relief Sought
Chapter 7 Transport				
1.	General/all	Oppose	The proposed provisions in their entirety concerning transport are onerous and unnecessary and are not necessary for the purposes of implementing the NPS-UD or the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021.	Delete the proposed provisions to the Transport Chapter in their entirety.
2.	Policy 7.2.1.2 (xi) High trip generating activities	Oppose	Requiring the reduction of greenhouse gas emissions from vehicular trips associated with all high trip generating activities is not necessary, practicable or appropriate. Requirements for cycle parking and end of trip facilities, removal of minimum parking	

No.	Provision	Position	Submission	Relief Sought
			requirements, and non-statutory measures such as improved walking/cycling/PT facilities otherwise adequately reduce greenhouse gas emissions from vehicular trips.	
3.	Policy 7.2.1.9 Pedestrian Access	Oppose	The requirements of the policy are onerous, subjective and otherwise unnecessary accounting for the existing provisions in the plan concerning pedestrian access and urban design matters. The submitter is also concerned that requiring all pedestrian access to be of a width and grade suitable for all users, may not be appropriate or practicable in all cases.	
4.	Rule 7.4.3.7(b) Access Design	Oppose	For the reasons expressed in regards policy 7.2.1.9, the requirements for pedestrian access in this rule are opposed.	
5.	Rule 7.4.3.7(d) Access Design	Oppose	The requirement for either an audio and visual warning device or visibility splay for all sites on the same side of the road as a major cycle route in all zones, irrespective of the nature of the activity or its vehicle generation is unnecessary and onerous.	

No.	Provision	Position	Submission	Relief Sought
6.	<p>Rule 7.4.3.8 Vehicle Crossings</p> <p>And</p> <p>Rule 7.4.3.13 Co-location of Vehicle Crossings</p>	Oppose	<p>The requirements in 7.4.3.13 (as referred to in rule 7.4.3.8) are unnecessary, onerous and impractical. Among other concerns, the submitter notes that the rule creates a 'first in first served' situation for vehicle crossings which in greenfield residential areas may be problematic where adjoining sites are designed and / or obtain building consent, resource consents and / or vehicle crossing permits at a similar time with no knowledge of adjacent crossing positions.</p>	
7.	<p>Rule 7.4.4.18(a)(v ii) and advice note vii in Table 1</p> <p>Assessment matters for high trip generators</p>	Oppose	<p>For the reasons expressed in regards Policy 7.2.1.2 (xi) above, this assessment matter is opposed.</p> <p>Aside from those reasons, the submitter also considers it impractical from a commercial, monitoring and enforcement perspective to require '<i>measures to be implemented and maintained over the lifetime of the activity</i>'.</p>	
8.	<p>Rule 7.4.4.27 Assessment matters for pedestrian access</p>	Oppose	<p>For the reasons expressed in regards Policy 7.2.1.9 and Rule 7.4.3.7(b) above, this assessment matter is opposed.</p>	

No.	Provision	Position	Submission	Relief Sought
9.	Rule 7.4.4.28 Assessment matters for vehicle crossing co location	Oppose	For the reasons expressed in regards Rule 7.4.3.8 above, this assessment matter is opposed.	
10.	Table 7.5.2.1 – Minimum numbers of cycle parks required	Oppose	Increased requirements for cycle parking for social housing and residential units are opposed on the basis that the requirements are prescriptive and inflexible, and any additional cycle parking needs are best determined by the developer accounting for the needs of future residents, or informally provided as required. The proposed amendments will add unnecessary development costs, or onerous consenting requirements and will likely reduce development capacity.	
11.	Table 7.5.3.1 – Minimum numbers of loading spaces required	Oppose	Requirements for on-site loading for residential activities are opposed on the basis that the requirements are prescriptive and inflexible, and any loading needs are best determined by the developer accounting for the needs of future residents, or informally provided as required (including through on-street loading facilities). Requiring on-site loading (where car parking is not otherwise required and loading is not	

No.	Provision	Position	Submission	Relief Sought
			<p>presently required) will reduce development capacity and/or significantly increase the costs of development, accounting for the corresponding requirements for on-site access (and other requirements, such as on site turning, vehicle crossing constraints, etc) to facilitate on site loading. Informal loading, or temporary or permanent loading on-street is more effective, efficient and appropriate.</p> <p>The proposed amendments will otherwise add unnecessary development costs, or onerous consenting requirements.</p>	
12.	Appendix 7.5.7 Access design and gradient	Oppose	The amended requirements for access are unnecessary and will result in unreasonable development costs, reduced development capacity, and/or onerous consenting requirements.	

No.	Provision	Position	Submission	Relief Sought
Chapter 8 Subdivision, Development and Earthworks				
1.	8.1 Introduction	Oppose in part	To the extent that additional wording is proposed that specifically refers to 'development' a definition or further clarification of what this term relates to is necessary. In the absence of such	Delete, or provide a definition or explanation of the term 'development'.

No.	Provision	Position	Submission	Relief Sought
			clarification, the term is unclear and open to interpretation	
2.	8.2.2.2 Policy Allotments	Support	The amendments are pragmatic and support the provision of increased development capacity or alternative forms of housing supply and associated changes in tenure.	Retain.
3.	Policy 8.2.2.7 Urban density	Support	The amendments are pragmatic and support the provision of increased development capacity, whilst sensibly recognising constraints to achievement of minimum yields and other development constraints.	Retain.
4.	Objective 8.2.3 Infrastructure and transport	Support	The objective sensibly provides for engineering solutions that do not affect the 'existing' capacity of the wastewater system, without prescriptively limiting what those solutions may entail.	Retain.
5.	Policy 8.2.3.1 Infrastructure constraints	Oppose in part	To the extent that additional wording is proposed that specifically refers to 'development' a definition or further clarification of what this term relates to is necessary. In the absence of such clarification, the term is unclear and open to interpretation	Delete, or provide a definition or explanation of the term 'development'.
6.	Policy 8.2.3.2 Availability of infrastructure	Oppose in part	To the extent that additional wording is proposed that specifically refers to 'development' a definition or further	Delete, or provide a definition or explanation of the term 'development'.

No.	Provision	Position	Submission	Relief Sought
			<p>clarification of what this term relates to is necessary. In the absence of such clarification, the term is unclear and open to interpretation.</p> <p>Clause (g) is otherwise supported for the same reasons expressed in respect of objective 8.2.3 above.</p>	
7.	Objective 8.2.6 and policies 8.2.6.1-8.2.6.3 Urban tree canopy cover	Oppose	For the reasons expressed in further detail in the submitter's submissions on subchapter 6.10A, these provisions are opposed in their entirety.	Delete
8.	Rule 8.3.1 (e) and (f) Urban tree canopy cover	Oppose	For the reasons expressed in further detail in the submitter's submissions on subchapter 6.10A, these provisions are opposed in their entirety.	Delete
9.	Rule 8.3.3 (b) financial contributions	Oppose	For the reasons expressed in further detail in the submitter's submissions on subchapter 6.10A, these provisions are opposed in their entirety.	Delete
10.	Rule 8.3.7 consent notice	Oppose	For the reasons expressed in further detail in the submitter's submissions on subchapter 6.10A, these provisions are opposed in their entirety.	Delete

No.	Provision	Position	Submission	Relief Sought
11.	Rule 8.4.1.1 Notification	Support	The amended notification requirements are supported, accounting for the directions in the EHS Act.	Retain as notified.
12.	Rule 8.5	Support	The provisions are generally supported, to the extent that they are consistent with the submitters other submission points.	Retain as notified.
13.	Rule 8.6.1 Table 1 – Minimum net site areas - residential	Oppose in part	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Further, the proposed 450m2 minimum net site area is opposed on the basis that it conflicts with the objectives in the NPS-UD and District Plan to provide for the most intensive and efficient scale and form of development within Central City areas.	Delete.
14.	Rule 8.6.1 Tables 2 – 5 Minimum net site areas – other zones	Support	The amendments proposed to Tables 2-5 are supported.	Retain the changes as proposed to Rule 8.6.1 Tables 2 – 5.
15.	Rule 8.7.12 Tree canopy assessment matters	Oppose	For the reasons expressed in further detail in the submitter's submissions on subchapter 6.10A, these provisions are opposed in their entirety.	Delete.

No.	Provision	Position	Submission	Relief Sought
16.	8.9 Rules-Earthworks	Support	The amended provisions in rule 8.9 are generally appropriate.	Retain as notified.

No.	Provision	Position	Submission	Relief Sought
Chapter 9 Natural and Cultural Heritage, Sub Chapter 9.3 Historic Heritage				
1.	Policy 9.3.2.2.2 Identification, assessment and scheduling of heritage areas	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission.	Delete.
2.	Policy 9.3.2.2.3 - Management of scheduled historic heritage	Oppose	<p>Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission.</p> <p>The amendments to clause (b) of this policy are also opposed. The operative wording within this policy sensibly recognises that Significant (Group 2) heritage items are potentially capable of accommodating a greater degree of change than Highly Significant (Group 1) heritage items.</p>	Retain status quo.

No.	Provision	Position	Submission	Relief Sought
3.	Policy 9.3.2.2.5 Ongoing use of scheduled historic heritage	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, the changes to this policy are opposed.	Retain status quo.
4.	Policy 9.3.2.2.8- Demolition of scheduled historic heritage	Oppose	<p>Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, the changes to clause (a) of this policy are opposed.</p> <p>In addition, the changes to clause (a)(ii) are opposed insofar that they introduce a new 'test' for evaluating the demolition of historic heritage that presents an unreasonable and inappropriate threshold that materially changes and undermines the policy. By way of example, the proposed wording may preclude the demolition of heritage items that are significantly (physically) compromised, on the basis of one or more (non-physical) heritage values (e.g. historical/social or cultural/spiritual value) remaining.</p>	Retain status quo.
5.	Rule 9.3.3 How to interpret and	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, the	Delete all references to heritage areas.

No.	Provision	Position	Submission	Relief Sought
	apply the rules		changes to this rule, insofar that they relate to heritage areas are opposed.	
6.	9.3.4 Rules-Historic heritage	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, changes to this rule, insofar as they relate to heritage areas are opposed.	Delete all references to heritage areas within rule 9.3.4, including (and in particular) rules RD6-RD8.
7.	Matters of discretion 9.3.6.1(a)	Oppose	The submitter opposes the deletion of clause (a), given that damage incurred as a result of the Canterbury earthquakes of 2010 and 2011 including the costs of repair and reconstruction, remains a relevant matter for consideration.	Retain status quo for 9.3.6.1(a).
8.	Matters of discretion 9.3.6.1(p)	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, the matters under clause (p) are opposed.	Delete proposed 9.3.6.1(p).
9.	Matters of discretion 9.3.6.4	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, the matters in rule 9.3.6.4 are opposed.	Delete proposed rule 9.3.6.4.

No.	Provision	Position	Submission	Relief Sought
10.	Matters of discretion 9.3.6.5	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, the matters in rule 9.3.6.5 are opposed.	Delete proposed rule 9.3.6.5.
11.	Matters of discretion 9.3.6.6	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, the matters in rule 9.3.6.6 are opposed.	Delete proposed rule 9.3.6.6.
12.	Appendix 9.3.7.2 Schedule of Significant Historic Heritage Items	Oppose	For the reasons stated in the covering submission, the listing of the item and setting at 32 Armagh Street (and 325 Montreal Street) is inappropriate. Accordingly, this listing should be deleted.	Delete Heritage Item 390 and Heritage Setting 287 regarding 32 Armagh Street from Appendix 9.3.7.2.
13.	Appendix 9.3.7.3 Schedule of Significant Historic Heritage Areas	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, the changes to this schedule are opposed.	Retain status quo.

No.	Provision	Position	Submission	Relief Sought
14.	Appendix 9.3.7.4 Heritage item and heritage setting exemptions	Oppose	The exemptions provided in Appendix 9.3.7.4 are an important tool for incentivising the adaptive reuse and ongoing protection of heritage items. As such, the amendments proposed to this appendix which reduce the extent of exemptions is inconsistent with the Plan's objectives in relation to heritage and section 6 of the Act.	Retain the status quo.
15.	Appendix 9.3.7.7 – Residential Heritage Areas - Aerial Maps	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, Appendix 9.3.7.7 should be deleted.	Delete.
16.	Appendix 9.3.7.8 – Residential Heritage Areas – Site Contributions Maps	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, Appendix 9.3.7.8 should be deleted.	Delete.
17.	Appendix 9.3.7.9 – Residential Heritage Areas – Interface Sites and	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, Appendix 9.3.7.9 should be deleted.	Delete.

No.	Provision	Position	Submission	Relief Sought
	Character Area Overlay Maps			

No.	Provision	Position	Submission	Relief Sought
Chapter 13.6 SP School				
1.	Policy 13.6.2.1.2 Effects on neighbourhoods	Support	The amended wording of this policy heading better reflects the provisions in the NPS-UD and is supported.	Adopt.
2.	13.6.4.1.3 Restricted discretionary activities	Support	The amended wording within the table (insofar as it refers to 'Effects on...') better reflects the provisions in the NPS-UD and is supported.	Adopt.
3.	13.6.4.1.3 RD5	Support in part	The proposed rule is generally supported, however restricted discretionary status is not 'enabling' and accounting for the development intensity envisaged by the NPS-UD in high density residential areas, the submitter considers controlled activity status for this provision is more appropriate.	Amend rule 13.6.4.1.3 RD5, such that it is a controlled activity standard.

No.	Provision	Position	Submission	Relief Sought
4.	13.6.4.2.1 Maximum site coverage	Oppose in part	The submitter opposes the amendments to the rule, to the extent that it will impose greater constraints on building site coverage than the status quo. This will limit development capacity in a manner that is inconsistent with the NPS-UD.	Retain the status quo, insofar that the amendments propose greater constraints on building site coverage than the status quo.
5.	13.6.4.2.2 Height in relation to boundary	Oppose in part	The submitter opposes the amendments to the rule, to the extent that it will impose greater constraints on building height in relation to boundaries than the status quo. This will limit development capacity in a manner that is inconsistent with the NPS-UD.	Retain the status quo, insofar that the amendments propose greater constraints on building height in relation to boundaries than the status quo.
6.	13.6.4.2.3 Minimum building setback from road boundaries	Oppose in part	The submitter opposes the amendments to the rule, to the extent that it will impose greater building setbacks from road boundaries than the status quo. This will limit development capacity in a manner that is inconsistent with the NPS-UD.	Retain the status quo, insofar that the amendments propose greater building setbacks from road boundaries than the status quo.
7.	13.6.4.2.4 Minimum building setback from internal boundaries and maximum	Oppose in part	The submitter opposes the amendments to the rule, to the extent that it will impose greater building setbacks from internal boundaries and/or constraints on building length, relative to the status quo. This will limit development capacity in a manner that is inconsistent with the NPS-UD.	Retain the status quo, insofar that the amendments propose greater building setbacks from internal boundaries and/or constraints on building length, relative to the status quo.

No.	Provision	Position	Submission	Relief Sought
	building length			
8.	13.6.4.2.5 Maximum building height	Support	The amendments better enable development capacity and are supported.	Adopt.
9.	13.6.4.2.6 Landscaping	Oppose	The submitter opposes this new rule, noting it will limit development capacity in a manner that is inconsistent with the NPS-UD.	Delete.
10.	13.6.5.1 Effects on the neighbourhood	Oppose	The submitter opposes the proposed amendments to the assessment matter, noting it will impose additional constraints on and uncertainty for developments, and in doing so will limit development capacity in a manner that is inconsistent with the NPS-UD.	Delete.
11.	Appendix 13.6.6.2 State Integrated Schools	Support in part	<p>The Diocese seek that the alternative zoning of their integrated school sites appropriately reflects the likely future use of the land by the Diocese, whilst also accounting for the surrounding environment.</p> <p>The identification of alternative zones in the Appendix is generally supported, however the Diocese seeks the following amendments:</p>	<p>Amend Appendix 13.6.6.2 State Integrated Schools, so that the alternative zone for:</p> <ul style="list-style-type: none"> St Mary's School at Manchester Street is 'CCMUZ'; and St Teresa's on Puriri Street is 'HRZ' <p>Otherwise, retain the wording in the Appendix, insofar as it relates to the alternative zoning of all other state integrated schools.</p>

No.	Provision	Position	Submission	Relief Sought
			<ul style="list-style-type: none"> St Mary's school in Manchester Street is identified in this appendix with an underlying zoning of HRZ. This is opposed, and CCMUZ is sought as the underlying zone to better provide for spiritual activities on the site and align with the CCMUZ on the opposite side of Manchester Street. St Teresa's on Puriri Street, Riccarton is identified with an underlying MRZ. However, given the site's position adjacent to Riccarton Road, proximity to the Riccarton KAC, and the extent of the HRZ nearby, an underlying zoning of HRZ is considered more appropriate. 	

No.	Provision	Position	Submission	Relief Sought
Chapter 14 Residential				
Objectives & Policies				
1.	Objective 14.2.1	Support	The amendments to the objective are appropriate and better reflect the provisions of the NPS-UD.	Adopt.

No.	Provision	Position	Submission	Relief Sought
2.	Policy 14.2.1.1	Support	The amendments to the policy are appropriate and better reflect the provisions of the NPS-UD. They otherwise appropriately remove unnecessarily prescriptive references to minimum densities for different zones.	Adopt.
3.	Policy 14.2.1.2	Support	The deletion of the policy is supported.	Adopt
4.	Policy 14.2.1.2	Support	The deletion of the policy is supported, accounting for the changes proposed in response to the NPS-UD and Amendment Act.	Adopt
5.	Policy 14.2.1.3	Support	The deletion of the policy is supported, accounting for the changes proposed in response to the NPS-UD and Amendment Act.	Adopt
6.	Policy 14.2.3.6	Support	The proposed policy is supported, accounting for the directives within the NPS-UD and Amendment Act.	Adopt
7.	Policy 14.2.3.7	Oppose	The proposed policy is opposed, insofar as it states that increased buildings heights should 'only' be provided for where the matters listed in i-v. of the policy are achieved. Such requirements are not	Delete.

No.	Provision	Position	Submission	Relief Sought
			required by or consistent with the NPS-UD and Amendment Act.	
8.	Objective 14.2.5	Support	The proposed policy is supported, accounting for the directives within the NPS-UD and Amendment Act.	Adopt.
9.	Policy 14.2.5.1	Oppose	The proposed policy is opposed, insofar as it stipulates site layout and building design requirements that are not otherwise required by, or are inconsistent with, the NPS-UD and Amendment Act.	Delete.
10.	Policy 14.2.5.2	Support	The proposed amendments to the policy are supported, accounting for the directives within the NPS-UD and Amendment Act.	Adopt.
11.	Policy 14.2.5.3	Oppose	The proposed policy is opposed, insofar as it stipulates site layout and building and landscaping design requirements that are not otherwise required by, or are inconsistent with, the NPS-UD and Amendment Act.	Delete.
12.	Policy 14.2.5.4	Oppose	The proposed policy is opposed, insofar as it stipulates on site waste and recycling requirements that are not otherwise required by, or are inconsistent with, the NPS-UD and Amendment Act.	Delete.

No.	Provision	Position	Submission	Relief Sought
13.	Policy 14.2.5.5	Oppose	<p>The proposed policy is opposed, insofar as it stipulates wind management requirements that are not otherwise required by, or are inconsistent with, the NPS-UD and Amendment Act.</p> <p>The submitter is particularly concerned at the cost and practical implications of providing assessments in accordance with this policy, noting the highly specialised expertise required (with associated cost, availability and time implications).</p> <p>The submitter is also concerned at the potentially subjective nature of aspects of the policy.</p>	Delete.
14.	Policy 14.2.5.6	Support	The proposed amendments to the policy are supported, accounting for the directives within the NPS-UD and Amendment Act.	Adopt.
15.	Objective 14.2.6	Support	The proposed objective is supported, accounting for the directives within the NPS-UD and Amendment Act.	Adopt.
16.	Policy 14.2.6.2	Support	The proposed policy is supported, accounting for the directives within the NPS-UD and Amendment Act.	Adopt.

No.	Provision	Position	Submission	Relief Sought
17.	Objective 14.2.7	Support	The proposed objective is supported, accounting for the directives within the NPS-UD and Amendment Act.	Adopt.
18.	Policy 14.2.7.1	Support	The proposed policy is supported, accounting for the directives within the NPS-UD and Amendment Act.	Adopt.
19.	Policy 14.2.7.2	Support	The proposed policy is supported, accounting for the directives within the NPS-UD and Amendment Act.	Adopt.
20.	Policy 14.2.7.3	Support	The proposed policy is supported, accounting for the directives within the NPS-UD and Amendment Act.	Adopt.
21.	Policy 14.2.7.4	Support in part	The proposed policy is generally supported, accounting for the directives within the NPS-UD and Amendment Act. However, the submitter is concerned as to the potentially inappropriate constraints on development resulting from the words 'and restrict development to solely within...'. The proposed policy is generally supported, accounting for the directives within the NPS-UD and Amendment Act. However, the submitter is concerned as to the potentially inappropriate constraints on development	Amend to delete the words ',and restrict development to solely within,'.
22.	Policy 14.2.7.5	Support	The proposed policy is generally supported, accounting for the directives within the NPS-UD and Amendment Act. However, the submitter is concerned as to the potentially inappropriate constraints on development	Amend to delete the words ',and restrict development to solely within,'.

No.	Provision	Position	Submission	Relief Sought
			resulting from the words 'and restrict development to solely within...'. 	
23.	Policy 14.2.7.6	Support	The proposed policy is supported, accounting for the directives within the NPS-UD and Amendment Act.	Adopt.
24.	Objective 14.2.8	Support	The proposed objective is supported, accounting for the directives within the NPS-UD and Amendment Act.	Adopt.
Rules Introduction				
1.	14.3 (f)	Oppose	For the reasons set out in their submission on sub chapter 6.1A, the submitter opposes the extent of qualifying matters listed and seeks that this rule be amended in a manner consistent with the relief sought on that chapter.	Delete, in a manner consistent with the submission on chapter 6.1A.
RS and RSDT Zones				
1.	Rule 14.5.3.1.3 Area-specific restricted discretionary activities	Oppose.	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, Rule 14.5.3.1.3 should be deleted.	Delete.
2.	Rule 14.4.2.2 Tree and	Oppose	The proposed amendments incorporating tree planting rules are opposed for the	Delete.

No.	Provision	Position	Submission	Relief Sought
	garden planting		reasons expressed in regards Chapter 6.10A.	
RMD Zones				
1.	Rule 14.5	Oppose	<p>The submitter generally opposes any/all amendments to the RMD zone provisions, to the extent that these conflict with or are less enabling than the mandatory MDRS and/or impose additional constraints relative to the status quo.</p> <p>In the submitter's view, such requirements are not otherwise required by, or are inconsistent with, the NPS-UD and Amendment Act.</p> <p>Specific provisions of concern are further noted in the submission points below.</p>	Delete all new or amended provisions, to the extent that they conflict with or are less enabling than the mandatory MDRS and/or impose additional constraints relative to the status quo.
2.	Rule 14.5.2 Built form standards	Oppose	<p>Proposed new built form standards or amendments to existing standards are opposed to the extent that they conflict with or are less enabling than the mandatory MDRS and/or impose additional constraints relative to the status quo.</p> <p>Specific amendments requiring deletion include:</p>	Delete all new or amended provisions, to the extent that they conflict with or are less enabling than the mandatory MDRS and/or impose additional constraints relative to the status quo.

No.	Provision	Position	Submission	Relief Sought
			<p>Rule 14.5.2.2 (c)-(e) – landscaping & tree canopy</p> <p>Rule 14.5.2.9 - fences</p> <p>Rule 14.5.2.12 – ground floor habitable room</p> <p>Rule 14.5.2.13 – service, storage & waste spaces</p> <p>Rule 14.5.2.15 – garaging and carport location</p> <p>Rule 14.5.2.17 – location of mechanical ventilation</p> <p>Rule 14.5.2.18 – City Spine Transport corridor</p>	
3.	Rule 14.5.2.4 (c) Site coverage	Support	The exemption for eaves and roof overhangs is supported.	Adopt.
4.	Rule 14.5.3.1.3 Area-specific restricted discretionary	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, Rule 14.5.3.1.3 RD15 should be deleted.	Delete.

No.	Provision	Position	Submission	Relief Sought
	activities RD15			
5.	Rule 14.5.3.2 Area-specific built form standards	Oppose	<p>Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, Rule 14.5.3.2 should be deleted, insofar that this concerns heritage areas. This includes:</p> <p>Rule 14.5.3.2.3 Building Height</p> <p>Rule 14.5.3.2.7 Residential units per site</p> <p>14.5.3.2.8 Setbacks</p> <p>14.5.3.2.9 Building coverage</p> <p>14.5.3.2.10 Outdoor living space per unit</p>	<p>Delete the following rules, insofar that they refer to Heritage areas:</p> <p>Rule 14.5.3.2.3 Building Height</p> <p>Rule 14.5.3.2.7 Residential units per site</p> <p>14.5.3.2.8 Setbacks</p> <p>14.5.3.2.9 Building coverage</p> <p>14.5.3.2.10 Outdoor living space per unit</p>
High Density Residential Zone Provisions				
1.	Rule 14.6	Oppose	<p>The submitter generally opposes any/all amendments to the High Density Residential zone provisions, to the extent that these conflict with or are less enabling than the mandatory MDRS, the directives in NPS-UD policy 3, and/or impose additional constraints relative to the status quo.</p> <p>In the submitter's view, such requirements are not otherwise required by, or are</p>	<p>Delete all new or amended provisions, to the extent that they conflict with or are less enabling than the mandatory MDRS and/or impose additional constraints relative to the status quo.</p>

No.	Provision	Position	Submission	Relief Sought
			<p>inconsistent with, the NPS-UD and Amendment Act.</p> <p>Specific provisions of concern are further noted in the submission points below.</p>	
2.	Rule 14.6.1.3	Oppose	<p>Rules 14.6.1.3 RD6-RD23 entail requirements that are onerous, inefficient and ineffective and which will limit development capacity. Such requirements are not otherwise required by, or are inconsistent with, the NPS-UD and Amendment Act.</p> <p>A number of these standards are complex or unclear and do not accord with the requirements of objective 3.3.2.</p> <p>As restricted discretionary activities, these standards are not enabling of development, as required by the Amendment Act. If such standards are found to be appropriate, they should be imposed as controlled activity standards.</p>	Delete, to the extent that the proposed amendments conflict with or are less enabling than the mandatory MDRS.
3.	Rule 14.6.2.1 Building height	Oppose, in part	Whilst provision for increased building height is supported, a 14m building height is inadequate for a high density residential zone within the central city, where Policy 3 (c) of the NPS-UD directs that development of up to six stories is to be 'enabled'.	Amend, so as to provide for a 23m maximum building height.

No.	Provision	Position	Submission	Relief Sought
			In order to 'enable' development of up to six stories a height limit of 23m as a permitted activity is required for this zone.	
4.	Rule 14.6.2.2 height in relation to boundary And Appendix 14.16.2	Oppose	<p>The submitter opposes the height in relation to boundary QM and submits that only the angles and heights that must be included from Schedule 3A, Part 2, Density Standards (12) Height in Relation to Boundary of the Housing Supply Act be included in the District Plan.</p> <p>The QM/ appendix compromises the enablement of development and does not reduce regulatory constraints and increase housing supply as required through the Amendment Act and the NPS-UD.</p>	Amend Rule 14.6.2.2 and Appendix 14.16.2, to align with Schedule 3A, Part 2, Density Standards (12) Height in Relation to Boundary of the Amendment Act.
5.	Rule 14.6.2.5 Building separation	Oppose	The requirements of this rule are not required by and are inconsistent with, the NPS-UD and Amendment Act.	Delete.
6.	Rule 14.6.2.6 Fencing and screening	Oppose	The requirements of this rule are not required by and are inconsistent with, the NPS-UD and Amendment Act.	Delete.
7.	Rule 14.6.2.7 Landscaping and tree canopy cover	Oppose	The requirements of this rule are not required by and are inconsistent with, the NPS-UD and Amendment Act. The requirements will limit development capacity	Delete.

No.	Provision	Position	Submission	Relief Sought
			and are otherwise opposed for the reasons expressed in the submission on chapter 6.10A.	
8.	14.6.2.12 Building Coverage	Oppose	<p>50% site coverage is not appropriate in the HRZ Zone given that there are currently no building coverage limitations in the Residential Central City Zone. This rule is more restrictive than the current operative provisions. There should be no site coverage limit in the HRZ.</p> <p>The rule compromises the extent to which planning provisions enable development and does not reduce regulatory constraints and increase housing supply as required through the Amendment Act and the NPS-UD.</p>	Delete.
9.	<p>Rule 14.15.3(a) impacts on neighbouring property</p> <p>Matters of control and discretion</p>	Oppose	<p>The submitter considers that Clause 14.15.3 (a) need simplifying and amending to ensure it appropriately addresses the rules to which it relates. The rule is headed 'impacts on neighbouring properties' yet many of the matters do not relate to effects on neighbouring properties. The long list of matters is not in accordance with the enabling provisions of the NPS-UD.</p> <p>The extent of discretion compromises the extent to which planning provisions enable development and does not reduce regulatory constraints and increase housing supply as</p>	<p>Amend rule 14.15.3(a) as follows:</p> <p><i>a. Whether the increased height, or reduced setbacks, or recession plane intrusion would result in buildings that do not compromise the amenity of adjacent properties planned urban built character, taking into account. The following matters of discretion apply...</i></p> <p>[i.e. delete the balance of clause (a)]</p>

No.	Provision	Position	Submission	Relief Sought
			required through the Amendment Act and the NPS-UD.	

No.	Provision	Position	Submission	Relief Sought
Chapter 15 Commercial				
Chapter 15 objectives & policies:				
1.	General feedback re policies	Oppose	PC14 fails to include policy provisions that explicitly implement the NPS-UD directives in Policy 3 in regards to building height and provide clear expectations in regards to the heights of buildings, particularly in the central city.	Insert a new and explicit policy in regards to anticipated building heights, consistent with NPS-UD policy 3.
2.	Policy 15.2.2.1 (Role of Centres)	Support with amendment	<p>Amendments anticipating 'high' rather than 'medium' density housing in and around town centre and local centre zones are generally supported.</p> <p>In respect of Table 15.1, Avonhead Mall is identified as a 'small' Local Centre, which has corresponding implications in respect of development potential. In respect of building height especially, such centres are constrained to 12m building height which is equivalent to the height permitted in surrounding residential zones and limits the</p>	Amend Table 15.1 to reclassify Avonhead as a Local Centre (<u>large</u>), rather than Local Centre (small).

No.	Provision	Position	Submission	Relief Sought
			<p>potential/practical intensification of this commercially zoned land resource.</p> <p>Given the extent of intensification provided for in the surrounding residential catchment (and likely increase in population as a consequence) and the absence of other commercial centres and activity in this catchment, a corresponding level of intensification at Avonhead mall is appropriate.</p> <p>Such intensification could occur without escalating the status of Avonhead in the commercial centres hierarchy (to a TCZ) by reclassifying the centre as a Local Centre (large).</p>	
3.	Objective 15.2.3 (Office parks & mixed use areas)	Support	The wording of this provision is generally supported.	Adopt.
4.	Policy 15.2.3.2 (Mixed use areas)	Support	The wording of this provision is generally supported.	Adopt.

No.	Provision	Position	Submission	Relief Sought
5.	Objective 15.2.4 (urban form, scale & design outcomes)	Support with amendment	<p>With the exception of clauses (a)(iv) and (vi) the wording is supported.</p> <p>In respect of clause (a)(iv) and (vi) the requirement for individual developments to 'manage adverse effects... that contribute to climate change' and 'support a reduction in greenhouse gas emissions' is uncertain and difficult to apply/administer for individual applications.</p> <p>Whilst such objectives are commendable, they should be directed at broader patterns of development rather than individual applications.</p>	<p>Amend clause (a)(iv) and (vi) as follows:</p> <p><i>iv. manages adverse effects (including reverse sensitivity effects) on the site and surrounding environment, including effects that contribute to climate change; and</i></p> <p><i>... vi. Promotes a zoning and development framework that supports a reduction in greenhouse gas emissions.</i></p>
6.	Policy 15.2.4.1 (Scale & form of development)	Oppose in part	<p>The proposed amendments to clause (a) of this policy introduce wording that is unclear, subjective and inappropriate. Clause (a) also seeks to constrain building heights and form within the central city in a manner that is inconsistent with the NPS-UD and the Amendment Act.</p> <p>Clause (b) of the policy is supported.</p>	<p>Delete the amendments to clause (a) of the policy.</p> <p>Adopt the amendments to clause (b) of the policy.</p>
7.	Policy 15.2.4.2 (Design of new development)	Oppose in part	<p>Clause (a) of this policy 'requires' new development to meet the various requirements listed in sub-clauses (i)-(x). Accordingly, it is important that those requirements are appropriately framed in terms of the outcomes sought, the certainty</p>	<p>Amend clause (a) of the policy as follows:</p> <p><i>a. Require new development to be well-designed and laid out by:</i></p> <p>...</p>

No.	Provision	Position	Submission	Relief Sought
			<p>they provide and the extent to which they support the purpose of PC14 to 'enable a greater scale and density of residential and business development in urban areas'.</p> <p>Against this context, the proposed amendments to this policy are opposed on the basis that they are uncertain, unreasonable, and/or do not support the purpose of PC14.</p> <p>Proposed amendments to the balance of the policy are supported.</p>	<p><i>viii. achieving a visually <u>appealing attractive</u> setting when viewed from the street and other public spaces, <u>that embodies a human scale and fine grain</u>, while managing effects on adjoining environments;</i></p> <p>[delete proposed clauses x-xv.]</p> <p>Retain the balance of the policy and amendments as proposed.</p>
8.	Policy 15.2.5.1 (Cathedrals in the Central City)	Oppose in part	Amend the policy to include reference to all three potential new cathedral sites as set out in the covering submission. Noting that part of the Barbadoes Street Site is already included in this Policy.	Amend Policy 15.2.5.1 to provide for a new catholic cathedral at one of the three sites identified in the covering submission.
9.	Policy 15.2.6.3 (Amenity)	Oppose in part	The proposed wording in clause (a)(ii) is opposed, insofar that this relates to constraints on built form which limit development capacity in a manner that is inconsistent with the NPS-UD and Amendment Act.	Delete the proposed amendments in clause (a)(ii).
10.	Policy 15.2.6.4	Oppose in part	Whilst <i>some</i> of the proposed additions to this policy concern matters that may be relevant considerations for new residential developments (e.g. as assessment matters),	Delete the proposed amendments in clauses (a)(vi)-(viii).

No.	Provision	Position	Submission	Relief Sought
	(Residential intensification)		<p><i>requiring</i> such matters within the policy potentially escalates their importance and may impose a 'policy barrier' to applications where the provision these requirements is not appropriate, necessary, or practicable.</p> <p>And, as set out in other submission points, a number of these matters are considered unnecessary and inappropriate, for the purposes of promoting intensification.</p> <p>Accordingly, the proposed additions to the sub-clauses within the policy should be deleted.</p>	
11.	Policy 15.2.6.5 (Pedestrian focus)	Oppose	<p>As set out in other submission points, controls on wind generation are opposed due to the difficulties of evaluating such effects with certainty and the practical limitations on obtaining such assessments. Moreover, changes to wind generation and the pedestrian environment are a necessary tradeoff contemplated by the NPS-UD, insofar as it directs maximum intensification of central city environments.</p> <p>The proposed amendment is otherwise unnecessary and inappropriate, for the purposes of promoting intensification.</p> <p>Accordingly, the proposed addition to the policy should be deleted.</p>	Delete.

No.	Provision	Position	Submission	Relief Sought
12.	Policy 15.2.7.1 (Diversity of activities)	Support	The policy is an enabling policy encouraging a diversity of activities and the amendments are supported.	Adopt.
13.	Policy 15.2.8.1 (Usability & adaptability)	Oppose	<p>The proposed addition of subclauses (a)(iv)-(vi) is opposed on the basis that such requirements do not reflect the operational and functional requirements of activities and buildings within the CCMUZ.</p> <p>If such requirements are intended to apply only to new residential developments, then the policy should be drafted to make this explicit (as is the case with policy 15.2.8.2 or clause vi. for example).</p>	<p>Delete subclauses (a)(iv)-(vi) of the policy as follows:</p> <p><i>a. Encourage a built form where the usability and adaptability of sites and buildings are enhanced by:</i></p> <p><i>iv. providing dedicated pedestrian access for each activity within a development, directly accessed from the street or other publicly accessible space;</i></p> <p><i>v. providing sufficient setbacks and glazing at the street frontage; and</i></p> <p><i>vi. where residential activity is located at the ground floor, ensuring the design of development contributes to the activation of the street and other public spaces.</i></p>
14.	Policy 15.2.8.2 (Amenity & effects)	Support with amendment	<p>With the exception of subclauses (a)(iv) and (vi) and the addition of the word 'including' in the prefacing text, the policy is generally supported.</p> <p>Subclause (a)(v) is opposed on the basis that: 'locating outdoor service space and car parking away from street frontages and entrances to buildings' may not always be</p>	Delete subclauses (a)(v) and (viii) of the policy.

No.	Provision	Position	Submission	Relief Sought
			<p>practicable or desirable and may establish a policy barrier to activities in such cases.</p> <p>Subclause (a)(viii) is opposed on the basis that urban design assessments impose unnecessary time, cost, and uncertainty for developments and built form standards provide a preferable method for managing development and providing certainty to all parties.</p> <p>The proposed amendments are otherwise unnecessary and inappropriate, for the purposes of promoting intensification.</p> <p>Accordingly, the proposed additions to the policy should be deleted.</p>	

Chapter 15 – Commercial Central City Zone Provisions:				
1.	Rule 15.11.1.1 P13 (CCZ residential activity)	Oppose	Proposed changes to clauses (e) and (f) regarding minimum outdoor living space requirements and new clauses (h) and (i) regarding outlook space are opposed. Such rules amount to greater regulatory constraint on residential development and are therefore not enabling of intensification. Accordingly, such changes should be deleted.	Delete.
2.	Rule 15.5.1.3 RD1 (LCZ- RDA consent requirements)	Oppose	For the reasons set out above in respect of Rule P21, the amendments to rule RD1 (which specify a requirement for consent for a breach of the proposed additional rules in P21) are also opposed. As stated above, such changes are not necessary or appropriate for the purposes of promoting intensification and they impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty. Accordingly, these amendments should be deleted.	Retain the status quo in respect of Rule 15.5.1.3 RD1.
3.	Rule 15.5.2.2	Support	The proposed amendments to this rule support the purpose of PC14 in respect of intensification and are supported.	Retain the amendments as proposed.

	(LCZ- Building height)			
4.	Rule 15.5.2.5 (LCZ- Height in relation to boundary)	Support	The proposed amendments to this rule support the purpose of PC14 in respect of intensification and are supported.	Retain the amendments as proposed.
Chapter 15 – Commercial Central City Zone Provisions:				
1.	Rule 15.11.1.1 P13 (CCZ residential activity)	Oppose	Proposed changes to clauses (e) and (f) regarding minimum outdoor living space requirements and new clauses (h) and (i) regarding outlook space are opposed. Such rules amount to greater regulatory constraint on residential development and are therefore not enabling of intensification. Accordingly, such changes should be deleted.	Delete.
2.	Rule 15.11.1.2 C1 Controlled activities	Oppose in part	The submitter supports certification as a method and considers its application should not be limited to buildings 28m or less in height, or those compliant with rules 15.11.2.3 (sunlight and outlook for the street) or 15.11.2.12 (road wall height), given that such buildings will trigger restricted discretionary activity status in respect of those rules and provide Council with discretion to consider the corresponding	Amend Rule 15.11.1.2 C1 as follows: <i>a. Any new building, external alteration to any existing building, or the use of any part of a site not occupied by a building, for an activity listed in Rule 15.101.1.1 P1 to P17, which is:</i> <i>i. within the Central City Core area <u>28m or less in height; and</u></i> <i>ii. visible from a publicly owned and accessible space; and</i>

			assessment matters. To the extent that the urban design outcomes are otherwise achieved, this can still be assessed and certified by an independent urban design expert.	<p>iii. meets the following built form standards:</p> <p>A. Rule 15.11.2.3 Sunlight and outlook for the street; and/or</p> <p>B. Rule 15.11.2.12 Maximum road wall height;</p> <p>iv. iii. is certified by a qualified expert on a Council approved list as meeting each of the urban design provisions/ outcomes...</p>
3.	<p>Rule 15.11.1.3 RD5</p> <p>(CCZ- RDA consent requirement)</p>	Oppose	<p>For the reasons set out below in respect of the corresponding built form standards that are proposed, the amendments to rule RD5 are also opposed, noting these specify a requirement for consent for a breach of the following new rules:</p> <ul style="list-style-type: none"> A. Maximum building height B. Upper floor setbacks C. Tower dimension, site coverage and separation D. Wind <p>As stated below, such changes are not necessary or appropriate for the purposes of promoting intensification and they impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty.</p> <p>Accordingly, these amendments should be deleted.</p>	<p>Retain the status quo in respect of Rule 15.11.1.3 RD5.</p>

4.	Rule 15.11.1.3 RD11 (CCZ- RDA consent requirement)	Oppose	For the reasons set out below in further detail in respect of the building height built form standard (Rule 15.11.2.11 Building Height), this rule is opposed and should be deleted.	Delete.
5.	Rule 15.11.1.4 D1 (CCZ- DA consent requirement)	Oppose	Retaining discretionary status for a breach of building height and road wall height is at odds with the NPS-UD and the purpose of PC14 and accordingly this rule should be deleted. Building height and road wall height should be provided for as a permitted activity noting the control/discretion of building design that is otherwise afforded by the urban design rule (C1 and RD1).	Delete Rule 15.11.1.4 D1 in its entirety.
6.	Rule 15.11.2.3 Sunlight and outlook for the street	Support	The proposed amendments to this rule support the purpose of PC14 in respect of intensification and are supported.	Adopt.
7.	Rule 15.11.2.9 Sunlight and outlook at the boundary with a	Support	The proposed amendments to this rule support the purpose of PC14 in respect of intensification and are supported.	Adopt.

	residential zone			
8.	Rule 15.11.2.11 Building Height	Oppose	<p>The height limits in this rule are opposed in their entirety by the submitter.</p> <p>Among other reasons:</p> <ul style="list-style-type: none"> • The rules are fundamentally inconsistent with the requirements in policy 3 of the NPS-UD to '<i>enable... building heights and density of built form to realise as much development capacity as possible, to maximise benefits of intensification</i>'. Policy 3 was drafted specifically for New Zealand's Tier 1 cities – all of which feature heritage sites and buildings – indicating such built form is envisaged alongside these features. • The variable height limits for different parts of the city are arbitrary, inconsistent and inequitable. • To the extent that variable height limits are proposed in response to heritage values/features, this incorrectly assumes that building height and high density built form is inherently incompatible with heritage values. Such a conclusion is at odds with the evidence of successful intensive inner city development in international cities alongside heritage 	Delete rule 15.11.2.11 in its entirety.

			<p>features of considerably greater significance. Vibrant central cities (as sought by objectives in chapters 3 and 15) inherently feature heritage items alongside substantial modern buildings, and to rely on heritage features as a basis for limiting built form and height is narrow-minded, conservative and myopic.</p> <ul style="list-style-type: none"> • The heritage interfaces (and associated provisions) are generally opposed for the reasons stated in the covering submission. Among other things, it is noted that the heritage provisions in subchapter 9.3 provide for the management of buildings within heritage settings or alterations to heritage items. Accordingly, there is no need to separately constrain building height alongside or within heritage settings. • The height limits fail to adequately account for planned development currently progressing in parts of the City Centre Zone where lower heights are proposed. This includes the Catholic Cathedral Precinct (which includes the sites with road boundaries on the north side of Armagh Street at 129, 131, 133, 137 and 143 Armagh Street) and the Cathedral Square Height Precinct, where significant development proposals 	
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			<p>currently being planned entail buildings of a greater height than the proposed rules permit.</p> <ul style="list-style-type: none"> The design of tall buildings is otherwise managed by way of the control/discretion afforded by the urban design rule (C1 and RD1). <p>Accounting for the points above and given that the proposed constraints on building heights are not necessary or appropriate for the purposes of promoting intensification, they should be deleted, such that no maximum height limit applies throughout the City Centre Zone.</p>	
9.	<p>Rule 15.11.2.12</p> <p>(CCZ – road wall height)</p>	Oppose	<p>Retaining a maximum road wall height rule is at odds with the NPS-UD and the purpose of PC14 and accordingly this rule should be deleted.</p> <p>Road wall heights should be unconstrained and provided for as a permitted activity noting the control/discretion of building design that is otherwise afforded by the urban design rule (C1 and RD1).</p>	Delete Rule 15.11.2.12 in its entirety.
10.	<p>Rule 15.11.2.14</p> <p>(CCZ – building)</p>	Oppose	<p>Imposing new, additional rules regulating the design of buildings in a manner that may not be functional, efficient, economically viable and which may constrain the realisation of central city intensification is at odds with the NPS-UD and the purpose of</p>	Delete Rule 15.11.2.14 in its entirety.

	tower setbacks)		<p>PC14 and accordingly this rule should be deleted.</p> <p>To the extent that such matters warrant consideration through a consenting framework, the control/discretion of building design that is otherwise afforded by the urban design rule (C1 and RD1) is considered sufficient to address this matter.</p>	
11.	<p>Rule 15.11.2.15</p> <p>(CCZ – max tower dimension and upper floor site coverage)</p>	Oppose	<p>Imposing new, additional rules regulating the design of buildings in a manner that may not be functional, efficient, economically viable and which may constrain the realisation of central city intensification is at odds with the NPS-UD and the purpose of PC14 and accordingly this rule should be deleted.</p> <p>To the extent that such matters warrant consideration through a consenting framework, the control/discretion of building design that is otherwise afforded by the urban design rule (C1 and RD1) is considered sufficient to address this matter.</p>	Delete Rule 15.11.2.15 in its entirety.
12.	<p>Rule 15.11.2.16</p> <p>(CCZ – building tower separation)</p>	Oppose	<p>Imposing new, additional rules regulating the design of buildings in a manner that may not be functional, efficient, economically viable and which may constrain the realisation of central city intensification is at odds with the NPS-UD and the purpose of PC14 and accordingly this rule should be deleted.</p>	Delete Rule 15.11.2.16 in its entirety.

			To the extent that such matters warrant consideration through a consenting framework, the control/discretion of building design that is otherwise afforded by the urban design rule (C1 and RD1) is considered sufficient to address this matter.	
13.	Rule 15.11.2.17 (CCZ – Wind)	Oppose	<p>Imposing new, additional rules regulating the design of buildings in a manner that may not be functional, efficient, economically viable and which may constrain the realisation of central city intensification is at odds with the NPS-UD and the purpose of PC14 and accordingly this rule should be deleted.</p> <p>As set out in other submission points, controls on wind generation are opposed due to the difficulties of evaluating such effects with certainty and the practical limitations on obtaining such assessments. Moreover, changes to wind generation and the pedestrian environment are a necessary tradeoff contemplated by the NPS-UD, insofar as it directs maximum intensification of central city environments.</p> <p>The proposed rule is otherwise unnecessary and inappropriate for the purposes of promoting intensification and should be deleted.</p>	Delete Rule 15.11.2.17 in its entirety.
Chapter 15 – Commercial Central City Mixed Use Zone Provisions:				

1.	<p>Rule 15.12.1.1 P16</p> <p>(CCMUZ residential activity)</p>	Oppose	<p>The proposed amendments introduce additional design standards (re: street setback, glazing and outlook space requirements).</p> <p>Such changes are not necessary or appropriate for the purposes of promoting intensification and they impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty.</p> <p>Accordingly, these amendments should be deleted.</p>	Retain the status quo in respect of Rule 15.12.1.1 P16.
2.	<p>Rule 15.12.1.2 C1</p> <p>(CCMUZ - Catholic Cathedral)</p>	Support, with amendment	<p>Amend the rule to include reference to both the Barbadoes Street Site and the Manchester Street Site, noting that part of the Barbadoes Street Site is already included in this Rule.</p> <p>The rule enables flexibility of the built form, appropriate for the potential redevelopment of one of these sites to establish a new Catholic Cathedral.</p>	Amend Rule 15.12.1.2 C1 to include the whole of the Barbadoes Street Site, and the Manchester Street Site.
3.	<p>Rule 15.12.1.3 RD2</p> <p>(CCMUZ-RDA consent requirement)</p>	Oppose	<p>The changes proposed to this rule are not necessary or appropriate for the purposes of promoting intensification and they impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty.</p>	Retain the status quo in respect of Rule 15.12.1.3 RD5.

			Accordingly, these amendments should be deleted.	
4.	Rule 15.12.1.3 RD4 (CCMUZ- RDA consent requirement)	Oppose	<p>This new rule and its requirement for consent for residential developments within the CCMUZ is not necessary or appropriate for the purposes of promoting intensification and will impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty.</p> <p>Accordingly, these amendments should be deleted.</p>	Delete.
5.	Rule 15.12.1.3 RD5 (CCMUZ- RDA consent requirement)	Oppose	<p>This new rule and its requirement for consent for buildings exceeding 17m height within the CCMUZ is not necessary or appropriate for the purposes of promoting intensification and will impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty.</p> <p>Accordingly, these amendments should be deleted.</p>	Delete.
6.	Rule 15.12.1.3 RD6 (CCMUZ- RDA consent requirement)	Oppose	<p>This new rule and its requirement for consent is not necessary or appropriate for the purposes of promoting intensification and will impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty.</p>	Delete.

			Accordingly, these amendments should be deleted.	
7.	Advice note (at the end of 15.12.1.3)	Oppose	The advice note concerns residential heritage areas. For reasons stated in submissions specifically on residential heritage areas, this advice note is opposed.	Delete.
8.	Rule 15.12.2.1 (CCMUZ – Landscaping & trees)	Oppose in part	<p>Proposed clause (a)(iv) increases landscaping requirements from 5% of the site area to 10%.</p> <p>This change is not necessary or appropriate for the purposes of promoting intensification and will in fact be counter to intensification by diminishing the area of the site available for built form/development. The rule change will also impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty.</p> <p>Accordingly, this amendment should be deleted.</p>	Retain the status quo in clause (a)(iv) – i.e. 5% rather than 10% site landscaping.
9.	Rule 15.12.2.2 (CCMUZ – building height)	Oppose	The variable building heights and maximum building base heights are inadequate and inappropriate for a commercial zone within the central city, accounting for Policy 3(a) and Policy 3 (c) of the NPS-UD directs that development of up to six stories is to be 'enabled' as a minimum.	<p>Amend as follows:</p> <p>15.12.2.2 Maximum building height</p> <p><u><i>a. The maximum height of any building shall be 32 metres.</i></u></p> <p><i>b. The maximum height of any building shall be in accordance with the height specified Unless identified on the Central City Maximum Building Height</i></p>

			Accounting for this, the submitter seeks that the rule provide for a permitted maximum building height of at least 32m.	<p>planning map the maximum height of any building shall be 32 metres.</p> <p>b. The maximum height of any building base shall be 17 metres.</p> <p>€ b. Any application arising from this rule shall not be limited or publicly notified</p>
10.	<p>Rule 15.12.2.9</p> <p>(CCMUZ – Minimum number of floors)</p>	Oppose	<p>A prescriptive requirement for a minimum number of floors is opposed on the basis that this is not 'enabling' of development or responsive to the functional or operational needs of activities and commercial/market imperatives determining their optimal location.</p> <p>Accordingly, the proposed new rule requirement for a minimum of 3 floors is opposed.</p> <p>This change is not necessary or appropriate for the purposes of enabling intensification and will also impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty.</p> <p>Accordingly, this amendment should be deleted.</p>	Delete Rule 15.12.2.9 in its entirety.
11.	<p>Rule 15.12.2.10</p>	Oppose	<p>Imposing new, additional rules regulating the design of buildings in a manner that may not be functional, efficient, economically viable and which may constrain the</p>	Delete Rule 15.12.2.10 in its entirety.

	(CCMUZ – building setbacks)		realisation of central city intensification is at odds with the NPS-UD and the purpose of PC14 and accordingly this rule should be deleted.	
12.	Rule 15.12.2.11 (CCMUZ – building tower coverage)	Oppose	Imposing new, additional rules regulating the design of buildings in a manner that may not be functional, efficient, economically viable and which may constrain the realisation of central city intensification is at odds with the NPS-UD and the purpose of PC14 and accordingly this rule should be deleted.	Delete Rule 15.12.2.11 in its entirety.
13.	Rule 15.12.2.12 (CCMUZ – glazing)	Oppose	Imposing new, additional rules regulating the design of buildings in a manner that may not be functional, efficient, economically viable and which may constrain the realisation of central city intensification is at odds with the NPS-UD and the purpose of PC14 and accordingly this rule should be deleted.	Delete Rule 15.12.2.12 in its entirety.
Chapter 15 – Commercial Central City (South Frame) Mixed Use Zone Provisions:				
1.	Rule 15.13.1.1 P3 (CC(SF)MUZ commercial services & offices)	Support in part	Given the central location of that part of this zone which is outside the Health and Innovation Precincts and that intensification of such land is likely to be realised by way of office development, the limitations in clause (a)(ii) of this rule limiting the total quantum of office activity are considered	Delete activity standard (a) from Rule 15.13.1.1 P3, as follows: <i>a. Outside the Health Precinct and/or the Innovation Precinct:</i> <i>i. Where office activities or commercial services are proposed on a site, individual tenancies shall not exceed 450m² of GLFA; and</i>

			<p>inappropriate and counter to the purpose of PC14.</p> <p>Retention of clause (a)(i) of the rule would ensure that any demand for large floor plate offices or larger office tenants is satisfied within the CCB zone.</p> <p>Enabling smaller office tenancies to establish within the CC(SF)MUZ would support, and not otherwise compromise, the intended role of the CCB zone.</p> <p>Noting the above, clause (a)(ii) of this rule should be deleted.</p>	<p>ii. The total area used for office activities and/or commercial services shall not exceed 450m² of GLFA per site, or 450m² of GLFA per 500m² of land area; whichever is greater. This limit may be exceeded where office activities and/or commercial services form part of a mixed-use development comprising residential activities, in which case the office activities and commercial services collectively shall not exceed 50% of the GLFA of the overall development.</p>
2.	<p>Rule 15.13.1.1 P13</p> <p>(CC(SF)MUZ residential activity)</p>	Oppose	<p>The proposed amendments now require 20m² (rather than 10m²) of outdoor living space for residential units with a ground floor habitable space and otherwise introduce additional design standards (re: glazing and outlook space requirements).</p> <p>Such changes are not necessary or appropriate for the purposes of promoting intensification and they impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty.</p> <p>Accordingly, these amendments should be deleted.</p>	<p>Retain the status quo in respect of Rule 15.13.1.1 P13.</p>

3.	<p>Rule 15.13.1.3 RD5</p> <p>(CCMUZ-RDA consent requirement)</p>	Oppose	<p>For the reasons set out below in respect of the corresponding built form standards that are proposed, the amendments to rule RD2 are also opposed, noting these specify a requirement for consent for a breach of the following new rules:</p> <ul style="list-style-type: none"> A. Maximum building height B. Minimum number of floors C. Upper floor setbacks, tower dimension and site coverage D. Glazing <p>As stated below, such changes are not necessary or appropriate for the purposes of promoting intensification and they impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty.</p> <p>Accordingly, these amendments should be deleted.</p>	<p>Delete proposed new clauses (j)-(m) in Rule 15.13.1.3 RD5.</p>
4.	<p>Rule 15.13.2.1</p> <p>(CC(SF)MUZ – height)</p>	Oppose	<p>The variable building heights and maximum building base heights are inadequate and inappropriate for a commercial zone within the central city, accounting for Policy 3(a) and Policy 3 (c) of the NPS-UD directs that development of up to six stories is to be 'enabled' as a minimum.</p>	<p>Delete rule 15.13.2.1 as proposed and replace with the following:</p> <p><i>15.13.2.1 Building height</i></p> <p><i><u>a. The maximum height of any building shall be 32 metres.</u></i></p>

			Accounting for this, the submitter seeks that the rule provide for a permitted maximum building height of at least 32m.	<u><i>b. Any application arising from this rule shall not be limited or publicly notified.</i></u>
5.	Rule 15.13.2.8 (CC(SF)MUZ – minimum number of floors)	Oppose	<p>The requirement for a minimum of 3, rather than 2 floors does not reflect the functional or operational requirements of many permitted activities that are expected to establish with the zone.</p> <p>This change is not otherwise necessary or appropriate for the purposes of promoting intensification and will in fact be counter to intensification by limiting more efficient forms of development based on a 3m ground floor height. The rule change will also impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty.</p> <p>Accordingly, this amendment should be deleted.</p>	Retain the status quo in respect of Rule 15.13.2.10.
6.	Rule 15.13.2.10 (CC(SF)MUZ – building tower setbacks)	Oppose	Imposing new, additional rules regulating the design of buildings in a manner that may not be functional, efficient, economically viable and which may constrain the realisation of central city intensification is at odds with the NPS-UD and the purpose of PC14 and accordingly this rule should be deleted.	Delete Rule 15.12.2.10 in its entirety.
7.	Rule 15.13.2.11	Oppose	Imposing new, additional rules regulating the design of buildings in a manner that may	Delete Rule 15.12.2.11 in its entirety.

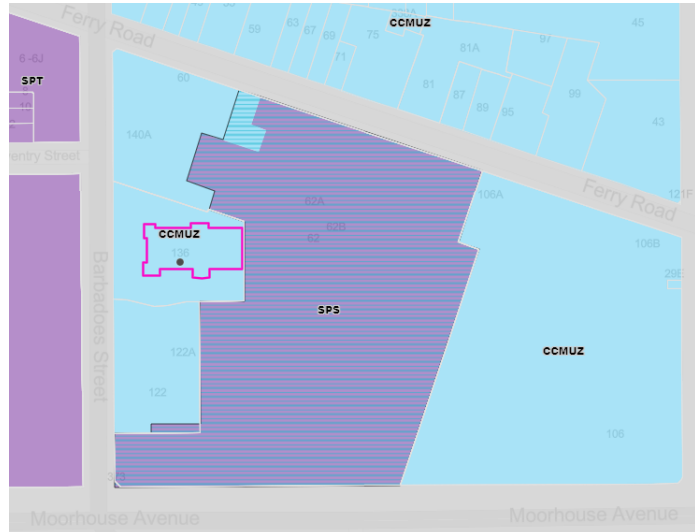
	(CC(SF)MUZ – building tower site coverage)		not be functional, efficient, economically viable and which may constrain the realisation of central city intensification is at odds with the NPS-UD and the purpose of PC14 and accordingly this rule should be deleted.	
8.	Rule 15.13.2.12 (CC(SF)MUZ – glazing)	Oppose	Imposing new, additional rules regulating the design of buildings in a manner that may not be functional, efficient, economically viable and which may constrain the realisation of central city intensification is at odds with the NPS-UD and the purpose of PC14 and accordingly this rule should be deleted.	Delete Rule 15.12.2.12 in its entirety.
Chapter 15 – Commercial Zones- Matters of Discretion				
1.	Rule 15.14.3.1 (Matters of discretion- building height)	Oppose	<p>The proposed new matters of discretion in clause (b) for applications exceeding the permitted maximum building height are:</p> <ul style="list-style-type: none"> a. Unnecessary, insofar that they introduce matters that are otherwise within the scope of the operative matters . b. Unclear and uncertain. c. Excessively broad in scope. <p>These changes undermine the enablement of building height as directed by the NPS-UD and they are not otherwise necessary or appropriate for the purposes of promoting</p>	Retain the status quo in respect of Rule 15.14.3.1 (and delete the proposed assessment matters in clause (b) in their entirety).


			<p>intensification. The rule change will also impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty.</p> <p>Accordingly, this amendment should be deleted.</p>	
2.	<p>Rule 15.14.3.35</p> <p>(Matters of discretion- upper floor setbacks, tower dimension and coverage)</p>	Oppose	<p>The proposed new matters of discretion relate to rules that are otherwise opposed, and as such these should be deleted.</p> <p>These changes undermine the enablement of building height as directed by the NPS-UD and they are not otherwise necessary or appropriate for the purposes of promoting intensification. The rule change will also impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty.</p> <p>Accordingly, this amendment should be deleted.</p>	Delete Rule 15.14.3.35 in its entirety.
3.	<p>Rule 15.14.3.36</p> <p>(Matters of discretion- Tower Roof Modulation)</p>	Oppose	<p>The proposed new matters of discretion in this rule are unnecessary, insofar that they introduce matters that are otherwise within the scope of the operative matters in Rule 15.14.3.1 clause (a).</p> <p>These changes undermine the enablement of building height as directed by the NPS-UD and they are not otherwise necessary or appropriate for the purposes of promoting intensification. The rule change will also</p>	Delete Rule 15.14.3.36 in its entirety.

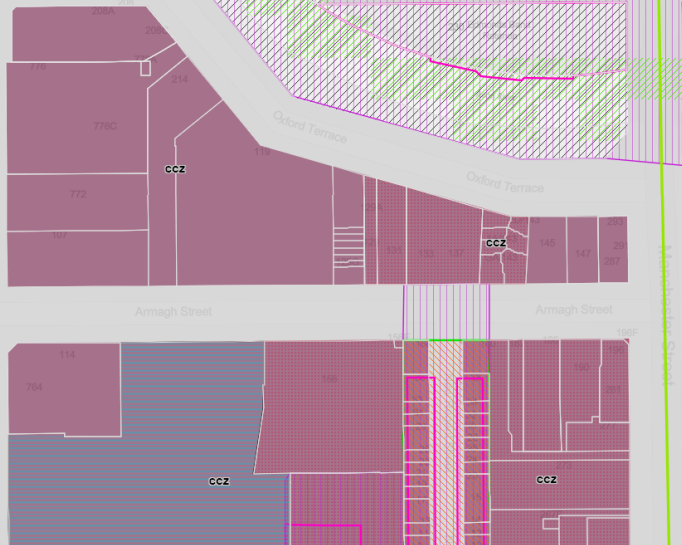
			<p>impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty.</p> <p>Accordingly, this amendment should be deleted.</p>	
4.	<p>Rule 15.14.3.37</p> <p>(Matters of discretion- Glazing</p>	Oppose	<p>The proposed new matters of discretion relate to rules that are otherwise opposed, and as such these should be deleted.</p> <p>These changes undermine the enablement of building height as directed by the NPS-UD and they are not otherwise necessary or appropriate for the purposes of promoting intensification. The rule change will also impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty.</p> <p>Accordingly, this amendment should be deleted.</p>	Delete Rule 15.14.3.37 in its entirety.
5.	<p>Rule 15.14.3.38</p> <p>(Matters of discretion- outlook space)</p>	Oppose	<p>These changes are not necessary or appropriate for the purposes of promoting intensification. The rule change will also impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty.</p> <p>Accordingly, this amendment should be deleted.</p>	Delete Rule 15.14.3.38 in its entirety.

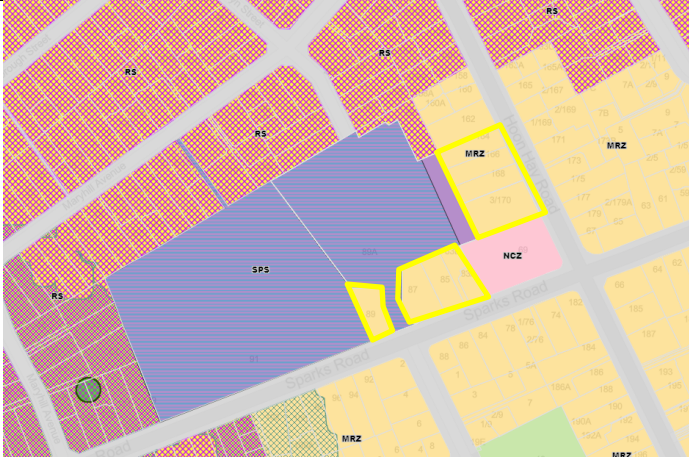
6.	Rule 15.14.3.39 (Matters of discretion-Wind	Oppose	<p>The proposed new matters of discretion relate to rules that are otherwise opposed, and as such these should be deleted.</p> <p>These changes undermine the enablement of building height as directed by the NPS-UD and they are not otherwise necessary or appropriate for the purposes of promoting intensification. The rule change will also impose additional consenting requirements with associated implications in terms of time, cost, and uncertainty.</p> <p>Accordingly, this amendment should be deleted.</p>	Delete Rule 15.14.3.39 in its entirety.
7.	Rule 15.14.5.2 (Matters of discretion-Buildings at 136 Barbadoes Street)	Support in part	Amend rule title as necessary given the above submission point.	Retain as notified, noting some consequential amendments might be required to the rule title given other submission points sought.
8.	Chapter 15 City Centre Zone Controlled Activities	Oppose in part	As the Armagh Street Site is a potential site for a new Catholic cathedral, flexibility is sought on this site similar to Rule 15.12.1.2 C1 in the CCMUZ.	Insert an equivalent Rule 15.12.1.2 C1 in the City Centre Zone, for the Armagh Street Site.

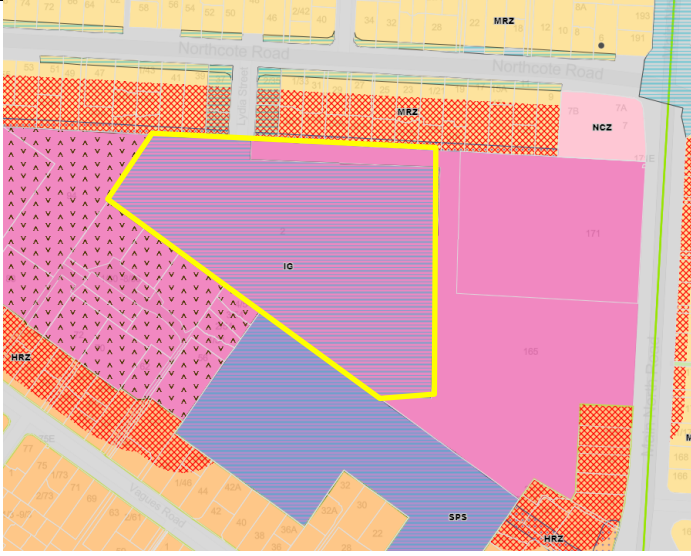
9.	Chapter 15 City Centre Zone Matters of Control	Oppose in part	As the Armagh Street Site is a potential site for a new Catholic Diocese cathedral, flexibility is sought on this site similar to Rule 15.14.5.2 in the CCMUZ.	Insert an equivalent section 15.14.5.2 in the City Centre Zone, for buildings at the Armagh Street Site.
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No.	Provision	Position	Submission	Relief Sought
Planning Maps / Rezoning				
1.	Planning maps	Support	<p>The zoning of the land at 136 Barbadoes Street is supported.</p> <p>However, given PC13 proposes to remove the heritage listing for the Cathedral, it is no longer appropriate for any of the planning maps to show a heritage item on the site. The Diocese therefore seek that the heritage listing shown at 136 Barbadoes Street is removed from the electronic planning map.</p>	<p>Retain the SPS and CCMUZ zoning of the land at 136 Barbadoes Street (identified below), but delete the heritage listing/outline from the planning maps.</p> 

No.	Provision	Position	Submission	Relief Sought
2.	Planning maps	Support	The zoning of the land at 373-375 Manchester Street is supported.	<p>Retain the SPS zoning of the land at 373-375 Manchester Street (identified below.</p> 
3.	Planning maps	Support in part	<p>For the reasons expressed in the submission above, the submitter supports the zoning of the land bounded by Oxford Terrace, Manchester Street, Armagh Street, and Colombo Street, but opposes a number of overlays applying to the land or adjacent land.</p> <p>Specifically, the submitter:</p> <ul style="list-style-type: none"> a. Opposes the extent of the heritage setting for New Regent Street (being 	<p>Amend the planning maps applying to the land bounded by Oxford Terrace, Manchester Street, Armagh Street, and Colombo Street, as follows::</p> <ul style="list-style-type: none"> a. Delete the extent of the heritage setting for New Regent Street (being heritage setting 336 associated with heritage item 404 in Appendix 9.3.7.2 schedule), so that it ends at the southern most edge of Armagh Street, being where New Regent Street meets Armagh Street.

No.	Provision	Position	Submission	Relief Sought
			<p>heritage setting 336 associated with heritage item 404 in Appendix 9.3.7.2 schedule) and considers the setting should end at the southern most edge of Armagh Street, being where New Regent Street meets Armagh Street.</p> <p>b. Opposes the Central City Heritage Interface overlay, where this applies to the to the site.</p>	<p>b. Delete the Central City Heritage Interface overlay.</p> 
4.	Planning maps	Support in part	<p>The Diocese has interests in land adjoining Our Lady of the Assumption school in Sparks Road, Hoon Hay. That school is subject to SPS zoning, but the adjacent land is zoned MRZ which limits the scope to establish school-related activity over these sites. Accounting for this, the Diocese seeks SPS zoning of the land.</p>	<p>Amend the planning maps by rezoning the land identified below as SPS (with a consequential change to Appendix 13.6.6.2 made, to identify an underlying zoning of MRZ):</p>

No.	Provision	Position	Submission	Relief Sought
				
5.	Planning maps	Support in part	<p>The Diocese has interests in land in and adjoining Lydia Street, Redwood. The majority of this land is being developed for the new Marian School campus, in accordance with a designation that applies to the land.</p> <p>However, the land remains subject to an IG zone under PC14, with this zoning reflecting the former use of the land. Due to the IG zoning, an Industrial Interface qualifying matter applies to the adjacent residential land on Lydia Street and Northcote Road.</p> <p>The Diocese consider that a Brownfield Precinct overlay should be applied to the land to recognise the attributes of the land</p>	<p>Amend the planning maps to identify a Brownfield Precinct overlay, over the IG zoned school site; and delete the Industrial Interface overlay for those properties with frontage to Northcote Road or Lydia Street.</p>

No.	Provision	Position	Submission	Relief Sought
			<p>and that any use of surplus school land may be appropriate for residential development.</p> <p>The Diocese also questions the appropriateness of the Industrial Interface overlay applying to those sites along Lydia Street and Northcote Road, given that they will be adjoining a school and supermarket (both under development) rather than industrial activities which the interface overlay is intended to address.</p>	

Details of submitter No: 835 - Lynne Lochhead

Submitter:	Lynne Lochhead
Submitter Address:	123 Huntsbury Avenue, New Zealand, 8022
Organisation:	Historic Places Canterbury

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 16/05/2023

First name: Lynne

Last name: Lochhead

Organisation: Historic Places Canterbury

Preferred method of contact Email

Postal address:

Email:

Daytime Phone:

Would you like to present your submission in person at a hearing?

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.


Person of interest declaration: I am *

Explain the grounds for saying you come within category (a) or (b) above:

Note to person making further submission:

- A further submission can only support or oppose an original submission listed in the summary. It is not an opportunity to make a fresh submission on matters not raised in the submission.
- A copy of your further submission must be served on the original submitter within 5 working days of making the further submission to the Council

Attached Documents

Name
Submission on Plan changes 13 14 



Submission District Plan Changes: Plan Change 13 Heritage & Plan Change 14 Housing and Business Choice

Historic Places Canterbury (HPC), an independent regional society affiliated to Historic Places Aotearoa (HPA). Our objectives are the protection of heritage, providing local advocacy on heritage and promoting the education of the public in their appreciation of heritage values.

Plan Change 14

HPC accepts that it is desirable to contain urban growth by promoting intensification in order to keep our cities from encroaching further on versatile soils needed for the production of food and to ameliorate impacts on global warming by avoiding costly and inefficient extension of infrastructure by maximising the utility of existing infrastructure. We recognise that the Council is required to accept government direction around intensification. While addressing this issue is necessary, we believe that the approach conceived by central government, which gives a virtually blanket right to build multi-story dwellings on any existing titles, is clumsy. It disregards the many likely adverse consequences which will follow from ignoring principles of good planning and urban design and the benefits of local knowledge. HPC recognises that Plan Change 14 does its best to work within the constraints that have been imposed upon the Council by central directive. We are broadly supportive of the proposed changes. Points we strongly wish to support and any concerns which we have are outlined below.

Qualifying Matters

We strongly support all the proposed Qualifying Matters, but in particular those matters listed under Matters of National Importance (RMAs.6), including historic heritage; Public Open Space Areas; Residential Heritage Areas and Residential Character Areas; Sunlight Access; Riccarton Bush Interface; and the Otakaro Avon River Corridor. Although our concerns as a group relate primarily to heritage, we consider that many of the other qualifying matters such as the Tsunami Management Areas and Vacuum Sewer Wastewater Constraint and Low Public Transport Accessibility Areas are sensible qualifying matters which will help to protect quite large areas of the city from the random high density developments that will have adverse consequences in the longer term, and from our perspective, will also help to maintain their existing character.

Sunlight access

We fully support making sunlight access a qualifying matter so that recession planes can be adjusted to allow Christchurch developments under the MDRS to have the same amount of sunlight access as Auckland developments. Furthermore, we would argue that a similar amount of sunlight access to Auckland represents a bare minimum of what is acceptable because, with the lower temperatures experienced in Christchurch over winter, maximising sun access is a desirable objective not only to mitigate the need for greater energy use associated with heating but also to enhance health and well-being. In our view, no ground-floor sun for over 3 months of the year

seems a totally unsatisfactory standard, whether in Christchurch or Auckland.

Recession planes set at the level dictated by MDRS would result in overshadowing of existing buildings, making them less desirable and precipitating their replacement. This may be viewed by some as a positive, helping to speed up the pace of intensification, however it is worth recalling that demolition and construction are our second largest contributor to carbon outputs and account for approximately 40% of hard-fill waste. Adaptation of the existing housing stock, together with more sympathetic infill may ultimately be a better outcome for both people and the environment than the rather heedless rush to demolish and build multi-dwelling structures which the MDRS promotes. We would do well to heed the lessons to be learned from mistakes which other countries made in trying to meet post-war housing shortages by failing to take sufficient account of the importance of livability and amenity. It is a well documented fact that the most successful post-war housing programmes resulted from close consultation and collaboration with the communities that were being housed.

Tree Cover

Loss of tree canopy has been one of the notable features of intensification within the city to date and increased intensification can only lead to further loss despite the measures being proposed in mitigation. We support the plan's recognition of the importance of trees in mitigating the effects of global warming and providing other environmental benefits. We welcome the inclusion of scheduled trees as a qualifying matter and we believe that work to add to the scheduled list must be a high priority, given the ongoing loss of trees from the city. We also support updating of setbacks to better protect individual trees.

We support all efforts to incentivise tree planting, including the canopy cover requirements relating to development and subdivision consents. We also support the proposal to require financial contributions to allow mitigating planting on council owned land where the required tree-canopy cover, through either retention of existing trees or new planting, has not been met. However, while additional planting on Council-owned land is highly desirable, that can never fully compensate for the loss of tree cover and consequent loss of amenity in the areas affected by intensification. Even where sufficient trees are planted to meet the canopy rules, it will be years before a young tree can provide the environmental benefits and the amenity for people that mature trees provide. In fact, HPC has some concerns that the financial contribution provision may prove to be a bit of a double edged sword. It would be unfortunate if a well-meaning provision was used to provide an easy out for developers to pay up rather than seek to protect existing trees through clever design. Removal of mature trees needs to be seen as a last resort. There is a need for the Council to work much more closely with developers to overcome the clean-slate mindset which seems to prevail at present and the financial contribution need to be set at a level sufficient to discourage this clean-slate approach.

Even where mature trees are retained, it is vital to ensure that this will not just be for long enough to obtain the desired resource consent, only to have the trees die or require removal a few years down the track. All too often around the city large trees are seen to be dying back because they have suffered unsustainable root damage during construction nearby. While the rules make provision for providing sufficient soil volume and tree root dimensions for the tree's requirements and provide for maintenance of the trees or removal and replacement of any that are damaged, it is not clear how this will, in practice, be monitored.

Height

We acknowledge that it is sensible and appropriate to concentrate the highest density in the central city with further centres of both residential and commercial density concentrating around the

biggest outlying commercial hubs which are well served by public transport, gradually reducing to neighbourhood hubs. However, we have real concerns about the extent of the 90 metre central city zone. We note below that it adjoins 11 metre zones in some places and 32 metre zones in many places. We believe there is a need for a more graduated height around the boundaries of the 90 metre zone.

We strongly support the lower heights proposed adjacent to New Regent Street, The Arts Centre and Cathedral Square. However we are concerned that Hagley Park has not been given similar protection despite the fact that the Hagley Park Management Plan 2007 states as an objective, the investigation of a conservation buffer zone around the park to protect the integrity of its visual landscape. Tall buildings on land adjacent to the perimeter are recognised as a threat to the character of Hagley Park. It is disappointing that this has not been taken into account in setting the height limits around the park which, at 32 meters along Park Terrace, greatly exceed the previous limit of 14 metres. HPC believes that lower heights also need to be implemented adjacent to Cranmer and Latimer Squares, both of which are also scheduled heritage items. The proposed heights would allow 90 metres to the west of Latimer Square and 32 metres around Cranmer Square and to the east of Latimer Square. The 90 metre height limit is particularly concerning, though in reality it is probably unlikely to have any impact in the short term given the number of new buildings around the Square. We note that a Riccarton Bush Interface Area has been defined as a qualifying matter to protect the heritage landscape of Riccarton Bush, which we fully support. We acknowledge that this is a slightly different case as the interface area is vital to protect views to the bush from surrounding streets. Creating a Qualifying Interface Area may be a more flexible means of providing a buffer for the heritage areas of Hagley Park, Cranmer Square and Latimer Square than adjusting the height limits around them. We believe that it is important that some mechanism be put in place to protect their heritage values, their open space landscape values and the views outwards from within those spaces.

Plan Change 13

HPC supports the proposed simplification and clarification of the rules for heritage to help make them more workable, effective and easily understood. We also fully support the proposed addition of sites and interiors to the heritage schedule, including the upgrading of some listings. We are pleased to note that some of our recommended additional listings have now been included in the proposed change. We note that others are under investigation but have not been included because of time constraints in completing the necessary investigations. We acknowledge that thorough investigation is essential and support the continuation of this work. We hope, in due course, to see listing of the Barnett Avenue Pensioner Cottages, the Upper Riccarton War Memorial Library, The Princess Margaret Hospital and the former High Court, for all of which we have previously submitted supporting information.

We commend the commitment of the Council to providing interior protection for scheduled buildings and recognise that this is an ongoing process. It is pleasing that 26 interiors are proposed to be added to the schedule in this plan change.

Paragraph 3.3.15 of the s. 32 Report states that the owners of Daresbury (Highly Significant) and 32 Armagh St (Significant) wish to have their buildings removed from the Heritage Schedule. HPC is strongly opposed to this. Daresbury is a major building in the English Domestic Revival style by Samuel Hurst Seagar, one of Christchurch's most significant architects. Not only is it one of Seagar's finest buildings, it has important cultural associations including as the residence of the Governor General from 1940-50. A number of significant large scale domestic buildings by Seagar were lost in the earthquakes, making it all the more important that Daresbury should continue to be listed. Daresbury, it should be noted, is a category 1 item on the Heritage New Zealand list.

Though 32 Armagh is only scheduled as Significant we believe it is important that this building should also be retained on the list, especially as it forms part of the Inner City West Residential Heritage Area. It is

indicative of the mixed range of dwelling in the area. It is a survivor of a more modest style of house from an earlier period before the area became dominated by larger two storey gentleman's residences dating from the end of the 19th century through to the early 20th century. It forms a clear contrast in scale and architectural pretension to the much grander, architecturally designed "Orari" on the opposite side of Gloucester Street.

Residential Heritage Areas

We welcome the addition of 11 Residential Heritage areas and their inclusion as Qualifying Matters. We note that where a High Density Residential Zone or a Residential Visitor Accommodation Zone adjoins a Residential Heritage Area, provision has been made to assess the impact of a proposed building's location, design, scale and form on heritage values or whether it would visually dominate or reduce the visibility of the site from a road or other public space.

(9.3.6.6) It is unclear to us from the wording whether the emphasis is on the fact of a site sharing a boundary or the zone sharing the boundary. It appears from the s. 32 report that it refers to a site sharing a boundary and that sites separated by a road are not captured by this rule because such sites "will generally have reduced dominance effects due to their separation distance". We consider that this assumption is questionable. The potential for visual dominance will be affected both by the width of the the carriageway and also by the relationship between relative heights of adjoining zones. Furthermore, if High Density Residential sites are considered to have the potential for causing significant visual dominance effects, then this must hold even more true between a Residential Heritage Area and the Central City Zone with an allowable height of 90m. This zone adjoins part of the the Inner City West Residential Heritage area and though they do not "share a boundary" at any point because the two zones are separated by Montreal Street, there can be little doubt that the width of the street would not give sufficient separation to avoid visual domination of a 90m building over an 11m building. In our opinion, these rules need refinement.

Residential Character Areas

HPC welcomes the addition of three new character areas and while we regret the removal of two character areas in Sumner and the reduction in size of 7 of the existing character areas, we recognise that these no longer meet the criteria and should therefore be removed or require boundary adjustments. We welcome the inclusion of Residential Character Areas as a Qualifying matter and the introduction of restricted discretionary status to help better manage and protect character areas. We also support more restrictive subdivision for character areas.

Rules relating to demolition of scheduled heritage items

HPC is concerned that the rules around consent to demolish contain no acknowledgement of the waste generated through demolition, or the carbon retention benefits of embodied energy within buildings. While the rules provide for consideration to be paid to the costs of retention for the landowner, there is no recognition that the carbon costs or benefits should also form part of the decision making process, despite the Council's stated commitment to achieving carbon neutrality by 2045. It is our contention that the carbon impact of granting a demolition consent needs to be factored into the decision making process and that the rules should be amended accordingly. Owners should also be required to provide information on the cost of demolition to allow a fairer assessment of the cost to them of retaining a listed building.

Arguably all new developments should be required to undertake a 'whole of life' energy consumption and carbon emission audit.

Details of submitter No: 842 - Lydia Shirley

Submitter:	Lydia Shirley
Submitter Address:	
Organisation:	Fire and Emergency

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 16/05/2023

First name: Lydia

Last name: Shirley

Organisation: Fire and Emergency

Preferred method of contact Email

Postal address:

Email:

Daytime Phone:

Would you like to present your submission in person at a hearing?

Yes

Additional requirements for hearing: will consider presenting a joint case.

Person of interest declaration: I am

*


Explain the grounds for saying you come within category (a) or (b) above:

Note to person making further submission:

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- A copy of your further submission must be served on the original submitter within 5 working days of making the further submission to the Council

Attached Documents

Name

Fire and Emergency Submission - Christchurch City Council - Proposed Plan Change 13 and14 

Submission on notified Proposed Heritage Plan Change (PC13) and Proposed Housing and Business Choice Plan Change (PC14)

Intensification Streamlined Planning Process (ISPP)

To: Christchurch City Council

Name of Submitter: Fire and Emergency New Zealand

This submission is made on behalf of Fire and Emergency New Zealand (Fire and Emergency) to Christchurch City Council (CCC) on the Proposed Heritage Plan Change (PC13) and Proposed Housing and Business Choice Plan Change (PC14).

1.1 Context

The primary objective of Fire and Emergency is to reduce the incidence of unwanted fire and the associated risk to life and property. Fire and Emergency seek to:

- protect and preserve life; and
- prevent or limit injury; and
- prevent or limit damage to property and land; and
- prevent or limit damage to the environment¹.

Fire and Emergency's main functions² are –

- (a) to promote fire safety, including providing guidance on the safe use of fire as a land management tool; and
- (b) to provide fire prevention, response, and suppression services; and
- (c) to stabilise or render safe incidents that involve hazardous substances; and
- (d) to provide for the safety of persons and property endangered by incidents involving hazardous substances; and
- (e) to rescue persons who are trapped as a result of transport accidents or other incidents; and
- (f) to provide urban search and rescue services.

Fire and Emergency also has secondary functions to assist in matters to the extent that Fire and Emergency has the capability and capacity to do so and the capability to perform their main functions efficiently and effectively. These secondary functions³ are:

- (a) responding to medical emergencies; and

¹ Fire and Emergency New Zealand Act 2017 section 10(a)(b)

² Fire and Emergency New Zealand Act 2017 section 11(2)

³ Fire and Emergency New Zealand Act 2017 section 12(3)

- (b) responding to maritime incidents; and
- (c) performing rescues, including high angle line rescues, rescues from collapsed buildings, rescues from confined spaces, rescues from unrespirable and explosive atmospheres, swift water rescues, and animal rescues; and
- (d) providing assistance at transport accidents (for example, crash scene cordoning and traffic control); and
- (e) responding to severe weather-related events, natural hazard events, and disasters; and
- (f) responding to incidents in which a substance other than a hazardous substance presents a risk to people, property, or the environment; and
- (g) promoting safe handling, labelling, signage, storage, and transportation of hazardous substances; and
- (h) responding to any other situation, if Fire and Emergency has the capability to assist; and
- (i) any other function conferred on Fire and Emergency as an additional function by the Minister in accordance with section 112 of the Crown Entities Act 2004.

With the wider mandate and changing nature of Fire and Emergency response, the volume of incidents that Fire and Emergency responds to has grown, as has the range of incident types.⁴

On average, Fire and Emergency attend 5,917⁵ incidents annually across Christchurch. This includes an average of:

- 1,317 fires,
- 896 medical emergencies,
- 583 vehicle accidents,
- 419 rescues and public assists⁶, and
- 2,645 HAZMAT/Heat/Pressure/Electrical hazard, false alarms and other emergencies.

Fire and Emergency also face broad challenges, such as the increasing frequency and severity of extreme weather events associated with climate change, increasing intensification of urban areas, and competing access to resources such as water and transport infrastructure. These challenges make the environment Fire and Emergency operates in more complex and puts greater demands on Fire and Emergency as an organisation.

Territorial authorities have a role in ensuring that emergency service providers, such as Fire and Emergency, can continue to operate effectively and efficiently in a changing urban environment. This includes consideration and management of the actual and potential implications on emergency services when giving effect to the National Policy Statement on Urban Development 2020 (NPS-UD), and the Resource Management (Enabling Housing Supply and Other Matters) Act 2021 (Enabling Act).

Fire and Emergency note that Policy 1 of the NPS-UD seeks planning decisions contribute to well-functioning urban environments, which includes urban environments that, as a minimum, have good accessibility and are resilient to the likely current and future effects of climate change. Further, the management of significant risks for natural hazards is a matter of national importance under section 6 of the

⁴ There is an increasing need to respond to a wide range of non-fire emergencies, where Fire and Emergency often coordinate with and assist other emergency services. These include responding to motor vehicle accidents, medical call-outs, technical rescues, hazardous substance incidents such as gas or chemical leaks, and accidents and other incidents at sea. In 2016/17, Fire and Emergency attended more medical emergencies than structure and vegetation fires combined. (Source: NZ Fire Service Annual Report 2016/17)

⁵ Average 2017-2021

⁶ Average 2017-2021. Fire and Emergency note the impact of COVID-19 on the number of incidents over the 2020/2021 period. In some urban environments, Fire and Emergency observed a reduction in fires and traffic accidents over this period. It is suspected this may have been due to people being home more during the pandemic and perhaps making them more vigilant around fires and reduction of unwanted fire, and fewer people in the public domain thereby reducing the likelihood of unwanted fires at beaches and parks.

Resource Management Act 1991 (RMA) and is included in the definition of a Qualifying Matter in the Enabling Act.

This submission seeks to enable Fire and Emergency to carry out its primary objective and functions under the Fire and Emergency New Zealand Act 2017 to provide protection of people, property and the environment in the event of an emergency.

This submission addresses matters relating to activities required to be undertaken to enable an effective emergency response and to provide for the health and safety of people and communities in Christchurch. Issues of particular interest and relevance to Fire and Emergency broadly include:

- ensuring emergency services appliances and Fire and Emergency personnel can adequately access both built and natural environments across Christchurch in the event of an emergency, and
- ensuring new development, including infill development, is adequately serviced by firefighting water supply, and
- maintaining and developing Fire and Emergency's property estate (e.g. fire stations) in strategic locations and at appropriate times to enable Fire and Emergency to continue to meet the demands and expectations of communities as they grow and change.

1.2 Proposed Heritage Plan Change 13

PC13 introduces eleven new Residential Heritage Areas (RHA) with the intent to recognise and protect around 60 buildings, items and building interiors to the Schedule of Significant Historic Heritage identified in the district plan. A 2,320m² section of property at 91 Chester Street East (Lot 1 Deposited Plan 53863, 7,396m²) has been zoned Medium Density Residential and included within the proposed 'RHA 2 – Chester Street East / Dawson Street' as shown in Figure 1 below. It is noted that the remaining 5,076m² of the site where the fire station is located has been rezoned High Density Residential.

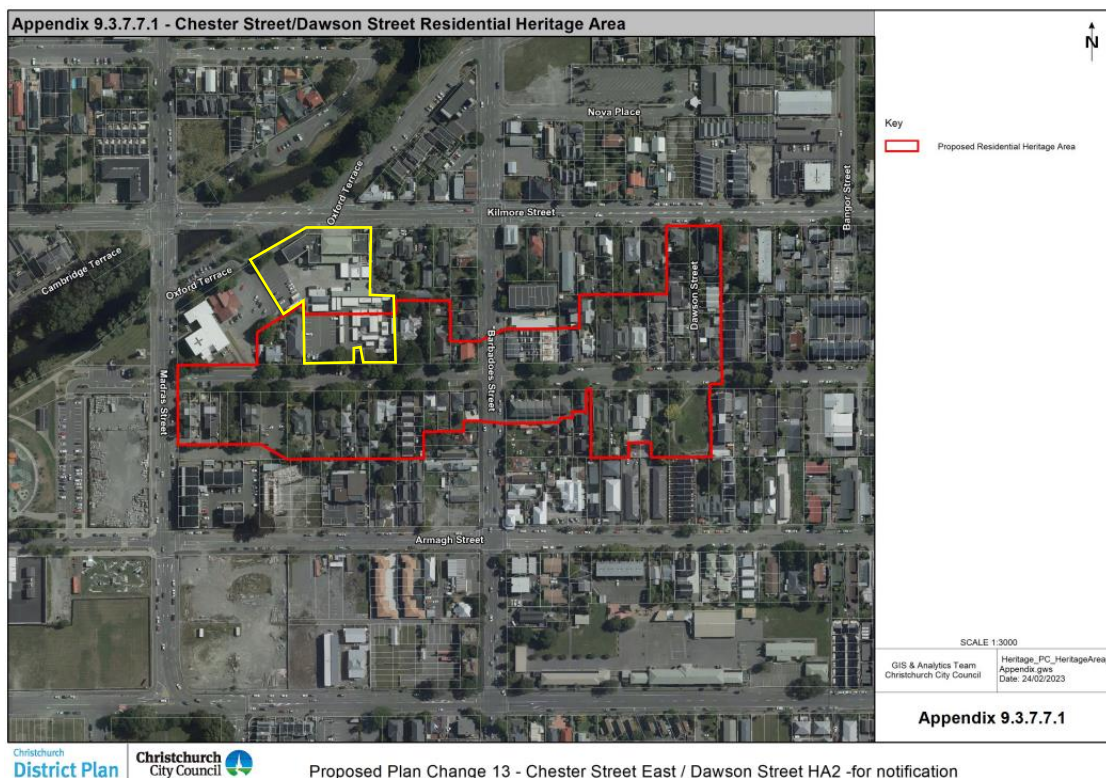


Figure 1. Proposed Residential Heritage Area 2 (shown in red) Fire and Emergency property shown in yellow.

Appendix 9.3.7.8.1 of the notified plan change documentation identifies 91 Chester Street East as an intrusive site within the RHA 2. As defined by PC13, an intrusive building or site as it relates to RHAs “are

buildings or sites which detract from and are inconsistent with the heritage values and significance of the heritage area. Vacant lots are also included as intrusive within the streetscape of the heritage area”.

Prior to notification of PC13, engagement occurred between Fire and Emergency and CCC in relation to 91 Chester Street East. This is recorded in the section 32 report which states:

Feedback requesting the removal of the Fire Station land situated at 91 Chester Street East was considered at a late stage, and a reduction of the site to be included in the Chester Street East/Dawson Street RHA was identified by staff as a possible compromise, however the details of this were not able to be agreed prior to notification. It is anticipated this will be addressed through submissions.

The site at 91 Chester Street East is held in the same Record of Title as the Christchurch City Fire Station (accessed via Kilmore Street) and is an integral part of the wider site. The site is currently occupied by portacom buildings which are used by Fire and Emergency. The site is intended to be developed into district offices and a resource garage which has been a longstanding proposal and integral to the functioning of the wider site.

While details around the site layout and built form have not been confirmed, the future district offices are likely to be single storey buildings and similar to the built form which surrounds the site. The resource garage will have the potential to be 5-6 metres in height.

The proposed RHAs introduce new rules and performance standards for developments within RHAs. For example, in RHAs, new buildings and alteration to building exteriors require resource consent as a restricted discretionary activity under Rule 9.3.4.1.3 RD6, except in situations specified in 9.3.4.1.3 RD6(c) and subject to matters of discretion set out in Rule 9.3.6.4.

For Fire and Emergency, this may require additional resource consents for any proposed new buildings on the site and require the buildings to be consistent with maintaining and enhancing the collective heritage values and significance of the heritage area and having regard to a suite of matters of discretion. In addition, any future alteration to building exteriors within the site would also likely require resource consent and based on the matters of discretion, require consultation with Heritage New Zealand Pouhere Taonga among other considerations, which will likely result in additional time and cost barriers for Fire and Emergency. These are likely to have operational and functional constraints for Fire and Emergency especially considering 91 Chester Street East is not subject to identified heritage items or within any heritage settings within the site.

Given the above, and that the future built form of 91 Chester Street East is unlikely to be inconsistent with the surrounding environment, it is considered that any potential development on the site would have minimal impact on the heritage area as built form already exists on the site.

Fire and Emergency request that the boundaries of RHA 2 are reduced to exclude the Fire and Emergency City Station site at 91 Chester Street East as shown in Figure 2 below. This is due to the additional time, costs and constraints imposed on this strategically significant site with no heritage items, buildings or settings present. Fire and Emergency need to be able to develop buildings that meet their operational and functional requirements. The future development of this site will be required to enable Fire and Emergency to carry out their primary objective and functions under the Fire and Emergency New Zealand Act 2017 to provide for the health and safety of people and communities in Christchurch.



Figure 2: Requested relief to remove 91 Chester Street East from RHA 2.

1.3 Emergency Service Access

Fire and Emergency requires adequate access to new developments, associated structures and the natural environment to ensure that they can respond in emergencies. This includes access in the event of fire, natural hazard, hazardous substances, medical or a rescue or assist.

Within the urban environment, the NPS-UD encourages higher residential densities, more varied housing typologies such as larger multi-unit development as well as a more compact urban form generally. While a more compact urban form focused on walkability and intensification around public transport (and subsequent mode shift) can reduce congestion and subsequently emergency response times, intensification and infill housing in Christchurch are challenging traditional access to properties for fire and other emergencies. This includes both vehicle access to the source as well as physical access by Fire and Emergency personnel to perform rescues and duties, where obstructions and site layout inhibit the use of lifesaving appliances such as ladders, hoses and stretchers.

The changes consequential to the NPS-UD will create new challenges for emergency services. Fire and Emergency consider it is vital for the health, safety and wellbeing of communities that the needs of emergency services are taken into account as new urban development is being planned. It is also important that future development areas are designed to be well-functioning and resilient to ensure that communities / residents are able to evacuate in the event of an emergency. If emergency responders cannot access people in the event of an emergency, this will not enable and provide for well-functioning and resilient communities and will not achieve Policy 1 of the NPS-UD. With regard to this, Fire and Emergency support the qualifying matter restricting developments to areas which are located within the key transport corridors.

1.3.1 Pedestrian only developments

Fire and Emergency note that as a result of the NPS-UD, the requirement for onsite parking in all residential developments has been removed, increasing the number of developments that provide only pedestrian access.

Fire and Emergency acknowledge that the New Zealand Building Code (NZBC) C5 specifies access and safety requirements for firefighting operations, where certain buildings must be designed and constructed so that there is a low probability of firefighters or other emergency services personnel being delayed in or impeded from assisting in rescue operations and performing firefighting operations. Buildings must also be

designed and constructed so that there is a low probability of illness or injury to firefighters or other emergency services personnel during rescue and firefighting operations.

Of particular note, a performance requirement of C5 is that buildings must be provided with access for fire service vehicles to a hard-standing from which there is an unobstructed path to the building within 20m of the firefighter access into the building and the inlets to automatic fire sprinkler systems or fire hydrant systems, where these are installed (among other requirements). These performance requirements do however not apply to detached dwellings, within household units in multi-unit dwellings, or to outbuildings, and ancillary buildings.

Given the shortfalls with the NZBC and the lack of clarity/consistency in the interpretation/application of the NZBC and the RMA, Fire and Emergency are concerned that pedestrian only access developments and inadequate vehicle access provisions can prevent efficient access to properties by responders in event of a fire or emergency or to use tools and equipment effectively if required. This has the potential to significantly increase the risk to life and property.

Should developments not provide a vehicle access and/or provides for pedestrian only access, this means that many developments will be unable to comply with the NZBC Fire and Emergency vehicular access requirements and subsequently firefighter access is not provided.

In the interim period while the NZBC catches up with the changing urban environment, Fire and Emergency consider that the RMA needs to address this matter up front in order to manage the use, development and protection of natural and physical resources which enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety in accordance with Section 5 of the RMA.

To support effective and efficient access and manoeuvring of crew and equipment for firefighting, medical, rescue and other emergency response to developments across Christchurch city, Fire and Emergency require:

- Pedestrian accessways that are clear, unobstructed and well-lit,
- Wayfinding for different properties on a development are clear in day and night,
- That developments give effect to the guidance provided in the Fire and Emergency's 'Designer's guide' to firefighting operations Emergency vehicle access' (December 2021)⁷,
- Pedestrian accessways have a minimum width of:
 - 3m on a straight accessway,
 - 6.2m on a curved or cornered accessway, and
 - 4.5m space to position the ladder and perform operational tasks.

1.3.2 Emergency vehicle access

Adequate fire appliance access to both the source of a fire (or other emergency) and a firefighting water supply is essential to the efficient operation of Fire and Emergency. The requirements for firefighting access are set out in the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008 (SNZ PAS 4509:2008)⁸, are further detailed in Fire and Emergency's 'Designer's guide' to firefighting operations Emergency vehicle access' (December 2021).

These requirements are necessary for Fire and Emergency to be able to operate pumping appliances from a hard standing. Often, this can be done from the public road, and this is how Fire and Emergency prefers to operate where possible. Pumping appliances are vehicles used to pump water for firefighting (refer Appendix A of the Fire and Emergency's 'Designers' guide). They carry a relatively small amount of water (1,350–

⁷ The Fire and Emergency Designers Guide to Firefighting Operations for emergency vehicle access provides help to ensure building designs comply with the NZBC C5 and can be found here: <https://www.fireandemergency.nz/assets/Documents/Business-and-Landlords/Building-and-designing-for-fire-safety/F5-02-GD-FFO-emergency-vehicle-access.pdf>

⁸ The New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008 can be found here: <https://fireandemergency.nz/assets/Documents/Files/N5a-SNZPAS-4509-2008-NZFS-Firefighting-water-supplies-Code-of-practice.pdf>

2,000 litres) and have a limited length of hose. Accordingly, Fire and Emergency must have access to a water supply and must also be able to base operations near the fire source, so firefighters can reach the fire with water.

Fire and Emergency has strong concerns that even in situations where the NZBC applies, many recent developments are not compliant with the performance criteria of C5 and therefore do not comply with the NZBC (in particular 20m access to the building for firefighting or 75m hose length to the furthest point). In addition, there have been recent examples of residential applications that have provided on-site alternative water supply for firefighting to respond to insufficient reticulated supply, but inadequate emergency access meaning that a fire appliance would not be able to reach the firefighting water supply.

For these reasons, CCC need to carefully consider how emergency vehicle access will be provided for new residential developments.

Given the apparent gap in the NZBC, significant consideration needs to be given to new rules and a related policy framework to enable adequate access to detached residential dwellings by emergency vehicles and personnel (i.e. SH risk group buildings not covered by the NZBC).

For all other developments to which C5 applies, Fire and Emergency request that, where not already provided for, the Christchurch District Plan introduce rules that 'duplicate' the requirements of the Part 6: firefighting of C/AS1 and C/AS2. Fire and Emergency consider that this approach would prevent resource consents being issued that could not be implemented because the layout does not demonstrate compliance with the performance requirements and need to be redesigned to provide sufficient firefighter access. This could mitigate some risks, especially when activities that currently require resource consent move to permitted.

Further, Fire and Emergency seek the provision of adequate access through voluntary measures such as 'best practice' recommendations in the urban design guides. These proposed measures would encourage developments to consider early in their design the requirements of emergency services. Fire and Emergency recommends developments give effect to the guidance provided in the Firefighting Operations Emergency Vehicle Access Guide.

Adequate provision for emergency responder access will enable Fire and Emergency to:

- Get into the building and to move freely around their vehicles.
- Gain access to rear dwellings on long sites where hose run lengths become an issue.
- Ensure the safety of firefighters and enable firefighters to deal quickly to smaller undeveloped fires before they develop and endanger members of the public and the firefighters who may need to assist them in either rescues and/or firefighting.

1.3.3 Carparking

Fire and Emergency is already encountering new development where emergency vehicle access along the roading corridor has been challenging. Issues with emergency vehicle access in these locations can be caused by narrow roads / laneways, higher density typologies and a lack of off-street parking available resulting in cars parking along both sides of already narrow residential streets. Implications for emergency services include on-road obstructions, meaning emergency vehicles have difficulty or are unable to manoeuvre, as well as an inability to access buildings and locate fire hydrants in an emergency. Inadequate parking lengths along frontages also have been encountered generally from vehicles parking over footpaths in driveways, blocking access.

Fire and Emergency acknowledges that, where no off-street parking is required, there may also be no requirement to provide for vehicular access to a property. In these situations, emergency service staff would need to enter a property on foot and/or remove fences and other structures to provide access. Regardless, there needs to be sufficient clearance to access properties with heavy emergency equipment.

Despite Policy 11 and clause 3.38 of the NPS-UD, consent authorities can continue to consider the effects of car parking supply and demand in resource consent applications. Given that section 104(1) requires a consent authority to have regard to 'any actual and potential effects on the environment of allowing [an] activity', an adverse effect of a particular activity could include adverse traffic effects on the local or wider road network.

Section 108AA of the RMA relates to requirements for conditions of resource consents. Section 108AA(1)(b) provides that a condition must not be included in a resource consent for an activity unless the condition is directly connected to one or both of an adverse effect of the activity on the environment and/or an applicable rule, or a national environmental standard.

Fire and Emergency supports the consideration of parking made through the PC14 amendments made to the matter of control 14.15.1 Residential Design Principles. This would enable conditions to be imposed on a case-by-case basis, having regard to the effects of a particular activity.

This will see that CCC and the community are still able to consider any positive or adverse effects, and ensure any adverse effects can be avoided, remedied and mitigated. This would likely be most appropriate for large development applications with a significant under-provision of parking for the type and location of the activity. Consideration should also be given to the requirements of a transportation assessment to determine the impact of development of the roading network. It could also be necessary to use a condition of consent to tie a development application to preparing or updating a comprehensive parking management plan.

1.3.4 Reduced setbacks

The minimum building setbacks from boundaries and between buildings in the Medium Density Residential Zone is 1m on side boundaries from buildings on all sides increasing the risk of fire spreading and can inhibit Fire and Emergency personnel from getting to the fire source. The difficulty of access may also increase the time for fire to burn, thereby increasing the heat radiation in a confined area.

The C3 of the NZBC is relevant here whereby buildings must be designed and constructed so that there is a low probability of fire spread to other property vertically or horizontally across a relevant boundary. Achieving this functional requirement is however limited by the mechanisms by which this is achieved (i.e. Acceptable Solutions) and buildings of which such requirements apply.

It is therefore vital that the NZBC is enforced and complied with to reduce the risk of fire spread in the intensified urban areas. This includes careful consideration of requirements to use non-combustible building materials to slow the vertical and horizontal spread of fire.

Fire and Emergency encourage CCC to consider integrating these considerations into the urban design guides to align with the NZBC and prompt developments to consider fire risk mitigations early on in design.

1.3.5 Other legislative requirements

PC14 will enable developments of medium and high densities which in most circumstances would increase the occupancy of buildings. As such, regulations under the Fire and Emergency New Zealand Act 2017 relating to evacuation schemes require consideration. These requirements relate to 'relevant buildings' (as defined by the Fire and Emergency New Zealand Act 2017) where a building or part of a building is used for one or more of the following purposes:

- (i) *the gathering together, for any purpose, of 100 or more persons:*
- (ii) *providing employment facilities for 10 or more persons:*
- (iii) *providing accommodation for 6 or more persons (other than in 3 or fewer household units):*
- (iv) *providing an early childhood education and care centre (other than in a household unit):*

- (v) *providing nursing, medical, or geriatric care (other than in a household unit):*
- (vi) *providing specialised care for persons with disabilities (other than in a household unit):*
- (vii) *providing accommodation for persons under lawful detention (not being persons serving a sentence of home detention or community detention, or serving a sentence of imprisonment on home detention, or on parole subject to residential restrictions imposed under section 15 of the Parole Act 2002):*
- (viii) *any other prescribed purpose; or...*

The NZBC does not stipulate the need for an alarm system that would support the expected coordination of an “Approved Evacuation Scheme” under the evacuation Regulations 2018. This increases the risk to the health and safety of people and communities where buildings are not adequately designed or built to provide for fire safety and evacuation procedures.

Until such time where the NZBC is updated to account for the intensification of the residential built environment, Fire and Emergency, as a minimum, seek that an advice note within the district plan be included to direct plan users to the Fire and Emergency New Zealand Act 2017, specifically, Clause 191 – Regulations relating to fire safety and evacuation procedures in relation to buildings, Clause 192 – Regulations relating to evacuation schemes for buildings and Part 2 of Fire and Emergency New Zealand (Fire Safety, Evacuation Procedures, and Evacuation Schemes) Regulations 2018 which relates to Evacuation Schemes.

1.4 Firefighting water supply

It is critical for Fire and Emergency that water supply infrastructure is in place prior to any development commencing and that this water supply has adequate capacity and pressures available to service the future growth. Fire appliances carry a limited amount of water; therefore, it is necessary that adequate water capacity and pressure be available to Fire and Emergency to control or extinguish a fire. In the urban areas of Christchurch, water is sourced from the reticulated water supply network however where reticulation is not available or limited (i.e. trickle fed), alternative water sources will be required. This may be in the form of dedicated water tanks or ponds for firefighting. Adequate physical access to this water supply for new development (whether reticulated or non-reticulated) is also essential.

Adequate capacity and pressure for each development can be determined through the SNZ PAS 4509:2008. The SNZ PAS 4509:2008 is a non-mandatory New Zealand Standard that sets out the minimum requirements for firefighting water and access in order for Fire and Emergency to operate effectively and efficiently in an emergency.

For subdivision and developments, provision of a firefighting water supply is required by Rule 8.7.7(b) of the operative Christchurch District Plan. Additional built form standards also exist in Chapter 14 Medium Density Residential standards (Rule 14.5.2.14), High Density Residential Zone (Rule (14.6.2.13), Commercial Zone standards (Rule 15.5.2.8 & 15.8.2.7) and have been further amended through PC14 to consider where the reticulated water supply is not available, an alternative firefighting water supply should be provided in accordance with SNZ PAS 4509:2008.

Fire and Emergency consider it essential that urban development does not occur out of sequence with the delivery of key strategic infrastructure (network extensions or upgrades), or development is not enabled where there is potential or known infrastructure capacity constraints in relation to the Three Waters, in particular the water supply network.

Fire and Emergency considers that all subsequent subdivision and development should be subject to development standards within the district plan requiring all applicants to demonstrate by way of providing evidence (i.e. hydrant flow testing) that their development can be adequately serviced for firefighting water

supply in accordance with the SNZ PAS 4509:2008 across all zones. If this does not become part of the consenting regime, there will likely be development with inadequate firefighting water supply with potentially serious consequences for life and property. Fire and Emergency strongly support CCCs approach requiring sufficient the provision of firefighting water supply through built form or activity standards through the district plan, including the amendments proposed through PC14.

1.5 Demand on emergency services

Fire and Emergency has a Statement of Performance Expectations⁹ which sets out targets to delivering timely and effective fire response and suppression services as well as other services¹⁰.

Community need for Fire and Emergency services has been increasing, thereby increasing Fire and Emergency's presence on the roads and need for fast and efficient access to incidents across Christchurch.

Urban growth and intensification coupled with the increasing rate of extreme weather events and risk from natural hazards and other environmental and demographic changes across communities is likely to result in a greater demand on emergency services and consequently can affect response times if not managed.

Fire and Emergency's response time commitments to the government and community are key determinants for the location of new, or expansion of existing fire stations. Fire stations therefore need to be strategically located within and throughout communities to maximise their coverage and maintain appropriate response times and efficiently provide for the health and safety of people and communities.

As urban areas develop and intensify, the ability to construct and operate fire stations in locations which will enable reasonable response times to fire and other emergencies is critical for the health, safety, and wellbeing of people in the community. In this regard, it is noted that Fire and Emergency is not a requiring authority under section 166 of the RMA and therefore does not have the ability to designate land for the purposes of fire stations.

Provisions within the rules of the District Plan therefore may be the best way to facilitate the development of any new emergency service facilities as the city grows. Ongoing, and more frequent engagement with Fire and Emergency in terms of growth projections and demographic changes will assist us in understanding where we may need new emergency service facilities in the future. This will be particularly important during plan review and plan changes that seek to re-zone large portions of land to facilitate development.

Fire and Emergency seek the following decision from the local authority:

Appendix A sets out the details of Fire and Emergency's submission, including the amendments sought by Fire and Emergency to specific provisions in PC13 and PC14, and the reasons for the amendments.

Fire and Emergency would welcome and questions or further engagement on matters raised in the submission.

Fire and Emergency may wish to be heard in support of its submission depending upon the proposed amendments to the PC13 and PC14 provisions as notified.



⁹ Statement of Performance Expectations 2022/23 can be found here: <https://www.fireandemergency.nz/assets/Documents/Files/Statement-of-Performance-Expectations-2022-2023.pdf>

¹⁰ Fire and Emergency Act 2017 sections 10-12

Signature of person authorised to sign on behalf of
Fire and Emergency

Date: 12/05/2023

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[Redacted]

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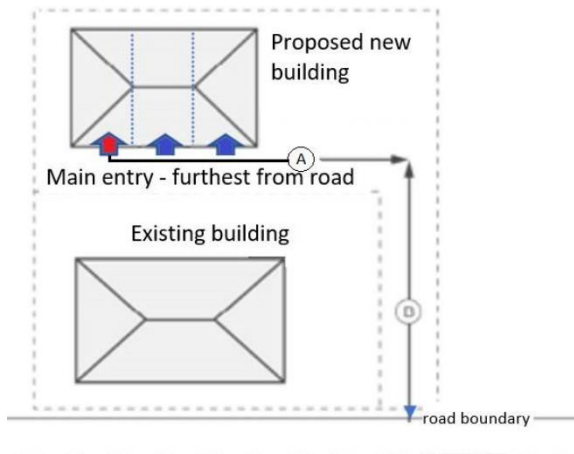
Appendix A

The following table sets out the specific position and any amendments sought by Fire and Emergency. Where specific amendments to provisions of PC13 and PC14 are sought, these amendments are shown as red underline (for new text sought) and ~~word~~ (for deletion).

ID	Proposed provision	Support /Oppose	Submission	Requested relief
Chapter 3: Strategic Direction				
1	3.3.7 Objective – Well functioning urban environments	Support	Fire and Emergency support new objective 3.3.7(a) to the extent that it anticipates a well-functioning urban environment that enables all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future. Fire and Emergency considers that this includes the provision of adequate emergency access and sufficient firefighting water supply.	Retain as notified.
2	3.3.8 Objective – Urban growth, form and design	Support	Fire and Emergency supports 3.3.8(ix) as it promotes the safe, efficient, and effective provision and use of infrastructure, including the optimisation of the use of existing infrastructure. This would include the water supply network.	Retain as notified.
Chapter 7: Transport				
3	7.2.1.9 Policy – Pedestrian Access	Support in part	Fire and Emergency supports policy 7.2.1.9 to the extent that the policy requires pedestrian access be designed to a sufficient width and grade meeting the requirements of all users. Given the importance and role of emergency services, Fire and Emergency request that the policy be amended to explicitly include reference to emergency services.	Amend as follows: 7.2.1.9 Policy – Pedestrian Access a. Pedestrian access is designed to: i. Be sufficient width and grade that the pedestrian access meets the access requirements of all users, including persons with a disability of with limited mobility <u>and emergency services</u> . ii. ...
4	7.4.4.27 Pedestrian Access	Support in part	Fire and Emergency's submission raises concern with pedestrian-only access developments not providing for emergency responder access. The proposed matters of discretion set out in 7.4.4.27 that apply to Rule 7.4.3.7b do not consider the ability for	Amend as follows: 7.4.4.27 Pedestrian Access a. The following are matters of discretion for Rule 7.4.3.7 b:

ID	Proposed provision	Support /Oppose	Submission	Requested relief
			emergency responders to undertake operational activities including movement of ladders.	<ul style="list-style-type: none"> i. whether the pedestrian access is suitable for use by persons with a disability or with limited mobility; ii. whether any alternative pedestrian access is provided and the formation and safety of that alternative; iii. the effects on the safety and security of people using the pedestrian access and those occupying residential units on the site; and iv. the functionality of the pedestrian access to meet the needs of occupants including but not limited to the transportation of rubbish and recycling for collection and the ability for cyclists to safely access any private and shared cycle storage areas, and v. <u>whether the pedestrian access is suitable for use by emergency services.</u>
5	Appendix 7.5.7 Access design and gradient	Support in part	<p>Fire and Emergency support in part:</p> <ul style="list-style-type: none"> • 7.5.7(a) – that requires all vehicle access to and within a site to be in accordance with the standards set out in Table 7.5.7.1, subject to the relief sought in Table 7.5.7.1. • 7.5.7(b) - to the extent that provision of passing bays may provide a hardstand area for fire appliances to operate in scenarios where vehicle accessways exceed 50m. • 7.5.7(c) – to the extent that it requires either a combined vehicle-pedestrian access or a dedicated pedestrian access with associated minimum standards. Fire and Emergency request that these minimum standards be amended to provide for emergency responder access for reasons set out in Section 1.3.1 above. 	<p>Amend as follows:</p> <p>Appendix 7.5.7 Access design and gradient</p> <p>...</p> <ul style="list-style-type: none"> c. For developments of three or more residential units, each unit shall be accessed by either a combined vehicle-pedestrian access or a dedicated pedestrian access that is: <ul style="list-style-type: none"> (i) a minimum <u>formed width</u> of 3 metres in width on a straight accessway, with a formed pathway of at least 4.5m; or (ii) <u>6.2m on a curved or cornered accessway;</u> and

ID	Proposed provision	Support /Oppose	Submission	Requested relief
			<ul style="list-style-type: none"> 7.5.7(h) – to the extent that it considers vehicle access for firefighting where a building is either located outside of a reticulated area, or further than 75m from the nearest road that is fully reticulated. This sets a minimum formed width of 3.5m and a height clearance of 4m. Section 1.3.2 of this submission sets out the minimum requirements for fire appliance access which includes a minimum of 4m vehicle access width in order to enable Fire and Emergency personnel to manoeuvre around the vehicle in an emergency. Correspondence with CCC post notification regarding Appendix 7.5.7(h) indicated that proposed changes to this clause were omitted from notification in error. Amendments are sought regarding this clause to provide sufficient access for emergency appliances. 7.5.7(n) – to the extent that it sets maximum gradients for vehicle accesses. Fire and Emergency further request amendments to the 7.5.7(n) as per relief. 	<p>(iii) each access shall be from the street to the front door of the unit and any garage or parking space for that unit.</p> <p>...</p> <p>h. For the purposes of access for firefighting, where a building is either:</p> <ul style="list-style-type: none"> i. located in an area where no fully reticulated water supply system is available; or ii. located further than 75 metres from the nearest road that has a fully reticulated water supply system including hydrants (as required by NZS 4509:2008). <u>75 metres is measured from the road boundary via an existing or proposed property access, to the main entry furthest from the road (Figure 7A); or</u> iii. <u>located in the Residential Hills Precinct and is a residential unit on a rear site,</u> <p>vehicle access shall have a <u>must be a</u> minimum formed width of 3.5 4 metres <u>for its entire length,</u> and a height clearance of 4 metres. Such vehicle access shall be designed <u>and maintained to be</u> free of obstacles that could hinder access for emergency service vehicles.</p> <p>...</p> <p>n. The maximum gradient at any point on a vehicle access shall be in accordance with Table 7.5.7.2, except a maximum gradient of 1 in 5 (minimum 4.0 metres long transition ramps for a change of grade 1 in 8 or greater) shall apply for accesses that are identified in (g and <u>h</u>). For curved accesses, the maximum gradient shall be measured on the inside of a curved vehicle access.</p>

ID	Proposed provision	Support /Oppose	Submission	Requested relief												
6	Figure 7A	New	The proposed Figure 7A is intended to assist plan users and provide clarity in relation to 7.5.7(h)(ii).	A+B Less than or equal to 75m 												
7	Table 7.5.7.1 – Minimum requirement for private ways and vehicle access	Support in part	Fire and Emergency require a minimum formed access width of 4m for emergency vehicles and a minimum 4m height clearance to be able to effectively and efficiently access sites with their fire appliances. It is noted that Appendix 7.5.7(h) requires a minimum access width of 4m where an accessway exceeds 75m (as per proposed new Figure 7A above). This is in acknowledgment that where accessways do not exceed 75m, Fire and Emergency should be able to operate from the road. The proposed minimum formed width for Table 7.5.7.1 a. and b. requires a 3.0m minimum formed width. While it would be Fire and Emergency’s preference that Fire and Emergency are able to access all properties with their vehicles, Fire and Emergency support the 3m width that applies to residential activity and offices in recognition that medium and high-density zones result in a more	Amend as follows: Table 7.5.7.1 – Minimum requirement for private ways and vehicle access: <table><tr><th></th><th>Activity</th><th>Minimum formed width (metres)</th><th>Central City height clearance (metres)</th></tr><tr><td>a.</td><td>Residential activity and offices</td><td>3.0</td><td>3.5 4.0</td></tr><tr><td>b.</td><td>Residential activity and offices</td><td>3.0</td><td>4.0</td></tr></table> Advice note: For any buildings that are greater than 75m from the road, Appendix 7.5.7 Access, gradient and design clause h is applicable.		Activity	Minimum formed width (metres)	Central City height clearance (metres)	a.	Residential activity and offices	3.0	3.5 4.0	b.	Residential activity and offices	3.0	4.0
	Activity	Minimum formed width (metres)	Central City height clearance (metres)													
a.	Residential activity and offices	3.0	3.5 4.0													
b.	Residential activity and offices	3.0	4.0													

ID	Proposed provision	Support /Oppose	Submission	Requested relief
			<p>compact environment. However, this support is subject to these buildings being no more than 75m from the road and that the relief sought in Appendix 7.5.7(h) is accepted in order to manage risk relating to emergency service access in the medium and high-density environments.</p> <p>The height clearance of 3.5m in a. would significantly impact the ability of emergency responders to provide effective and efficient assistance and therefore seek that this be increased to 4m in line with the SNZ PAS 4509:2008. Without the changes recommended above, assessment of non-compliance with this standard against matter of discretions is challenging as the permitted baseline is already insufficient.</p>	
Chapter 8: Subdivision, Development and Earthworks				
8	8.2.3.2 Policy – Availability, provision and design of, and connections to, infrastructure	Support	Fire and Emergency support the amendment to Policy 8.2.3.2 to include reference to ‘and development’ whereby requiring both subdivision and development to not occur in areas where infrastructure is not performing, serviceable or functional which would include the water supply network.	Retain as notified.
9	8.5.1.2 Controlled Activities C8	Support	<p>Fire and Emergency support subdivision being subject to Rule 8.6.7 that requires the provision of a sufficient water supply and access to water supplies for firefighting consistent with SNZ PAS 4509:2008.</p> <p>Additionally, Fire and Emergency further support the subsequent matter of control, 8.7.4.3k ‘Servicing and infrastructure’ requires consideration of the suitability of the proposed water supply for firefighting purposes, including the extent of compliance with SNZ PAS:4509:2008 in respect of the health and safety of the community, including neighbouring properties.</p>	Retain as notified.

ID	Proposed provision	Support /Oppose	Submission	Requested relief
10	8.5.1.2 Controlled Activities C9	Support	Fire and Emergency support subdivision being subject to Rule 8.6.7 that requires the provision of a sufficient water supply and access to water supplies for firefighting consistent with SNZ PAS 4509:2008. Additionally, Fire and Emergency further support the subsequent matter of control 8.7.4.3k 'Servicing and infrastructure' requires consideration of the suitability of the proposed water supply for firefighting purposes, including the extent of compliance with SNZ PAS:4509:2008 in respect of the health and safety of the community, including neighbouring properties.	Retain as notified.
11	8.5.1.2 Controlled Activities C10	Support	Fire and Emergency support subdivision being subject to Rule 8.6.7 that requires the provision of a sufficient water supply and access to water supplies for firefighting consistent with SNZ PAS 4509:2008. Additionally, Fire and Emergency further support the subsequent matter of control, 8.7.4.3k 'Servicing and infrastructure' requires consideration of the suitability of the proposed water supply for firefighting purposes, including the extent of compliance with SNZ PAS:4509:2008 in respect of the health and safety of the community, including neighbouring properties.	Retain as notified.
12	8.6.3 – Access	Support in part	Fire and Emergency support the access Rule 8.6.3(a) and the requirement to comply with the standards set out in Chapter 7, subject to the amendments sought in Appendix 7.5.7.	Retain as notified.
Chapter 9: Natural and Cultural Heritage				
13	9.3.4.1.1 Permitted activities P2	Oppose in part	Fire and Emergency seek clarity as to whether an intrusive building within a residential heritage area would be subject to the activity specific standards set out in permitted activity rule 9.3.4.1.1. This would result in unnecessary cost and time delays for Fire and Emergency to repair a building that is not of heritage value.	See relief sought in section 1.2 above.

ID	Proposed provision	Support /Oppose	Submission	Requested relief
			Notwithstanding this, Fire and Emergency has sought in in section 1.2 of this submission, that 91 Chester Street East be removed from RHA 2.	
14	9.3.4.1.1 Permitted activities P3	Oppose in part	91 Chester Street East, as notified is subject to 9.3.4.1.1 P3 (a)(iv). Given the site or associated buildings on site have no heritage fabric, it is assumed that the activity specific standard is not applicable. Notwithstanding this, Fire and Emergency has sought in in section 1.2 of this submission, that 91 Chester Street East be removed from RHA 2.	See relief sought in section 1.2.
15	9.3.4.1.1 Permitted activities P12	Oppose in part	Fire and Emergency recognise that this would enable the demolition or relocation of the buildings located at 91 Chester Street East as a permitted activity. Notwithstanding this, Fire and Emergency has sought in in section 1.2 of this submission, that 91 Chester Street East be removed from RHA 2.	See relief sought in section 1.2.
16	9.3.4.1.1 Permitted activities P13	Oppose in part	Fire and Emergency recognise that this would enable the construction of a fence or wall to 1.5m in height at 91 Chester Street East as a permitted activity. Notwithstanding this, Fire and Emergency has sought in in section 1.2 of this submission, that 91 Chester Street East be removed from RHA 2.	See relief sought in section 1.2
17	9.3.4.1.3 Restricted discretionary activities RD6	Oppose	Whilst the details around the site layout and built form have not been confirmed, the future district offices are likely to be single storey buildings and similar to the built form which surrounds the site. The resource garage will have the potential to be 5-6 metres in height. For Fire and Emergency, this would require additional resource consents for any proposed new buildings on the site including offices and a resource garage and would require the buildings to be consistent with maintaining and enhancing the collective heritage values and significance of the heritage area, and have particular regard to a suite of matters of discretion.	See relief sought in section 1.2.

ID	Proposed provision	Support /Oppose	Submission	Requested relief
			<p>In addition, any future alteration to building exteriors within the site would also likely require resource consent and based on the matters of discretion, require consultation with Heritage New Zealand Pouhere Taonga among other considerations, which will have additional time and cost barriers for the development.</p> <p>These are likely to have operational and functional constraints for Fire and Emergency especially considering 91 Chester Street East does not have any identified heritage items or heritage settings within the site.</p> <p>Fire and Emergency consider that it would be appropriate to remove 91 Chester Street from the RHA 2, enabling the development necessary to carry out their duty to provide for the health and safety of people and the community in Christchurch.</p>	
18	9.3.4.1.3 Restricted discretionary activities RD8	Support	<p>Fire and Emergency support the rule for any new buildings on a site in the High Density Residential Zone located outside a RHA as it is not likely that there will be any future additions to the Christchurch City Station site which is located in this zone.</p> <p>It is also noted that the site at 91 Chester Street East that Fire and Emergency are seeking the removal from RHA 2 is zone Medium Density Residential. Therefore, this rule would not be applicable to any development in the Medium Density Residential Zone portion of the site.</p>	Retain as notified.
19	9.3.6.4 Residential Heritage Areas (excluding Akaroa Township Heritage Area) - new buildings, fences and walls, and exterior alterations to buildings	Oppose in part	<p>Whilst the details around the site layout and built form have not been confirmed, the future district offices are likely to be single storey buildings and similar to the built form which surrounds the site. The resource garage will have the potential to be 5-6 metres in height.</p> <p>For Fire and Emergency, this would require additional resource consents for any proposed new buildings on the site including offices and a resource garage and would require the buildings to be</p>	See relief sought in section 1.2

ID	Proposed provision	Support /Oppose	Submission	Requested relief
			<p>consistent with maintaining and enhancing the collective heritage values and significance of the heritage area, and have particular regard to a suite of matters of discretion.</p> <p>In addition, any future alteration to building exteriors within the site would also likely require resource consent and based on the matters of discretion, require consultation with Heritage New Zealand Pouhere Taonga among other considerations, which will have additional time and cost barriers for the development.</p> <p>These are likely to have operational and functional constraints for Fire and Emergency especially considering 91 Chester Street East is not subject to identified heritage items or within any heritage settings within the site.</p> <p>Fire and Emergency consider that it would be appropriate to remove 91 Chester Street from the RHA 2, enabling the development necessary to carry out their duty to provide for the health and safety of people and the community in Christchurch.</p>	
20	9.3.6.6 Sites in the High Density Residential Zone and Residential Visitor Accommodation Zone Sharing a boundary with a Residential Heritage Area	Support	<p>Fire and Emergency generally support this matter of discretion as it is not likely that there will be further development on the Christchurch City Station site which is located in the High Density Residential Zone.</p> <p>It is also noted that Fire and Emergency are seeking the removal of 91 Chester Street from RHA 2. However, this portion of the site is zoned Medium Density Residential so any developments would not be subject to Rule 9.3.4.1.3 RD8 or this matter of discretion.</p>	Retain as notified.
21	Appendix 9.3.7.3 Schedule of Significant Historic Heritage Areas	Oppose	<p>Fire and Emergency oppose the inclusion of 91 Chester Street East as part of the RHA 2 as it imposes unnecessary restrictions on the site with regard to new buildings and alterations to existing buildings and introduces additional resource consent requirements. This will not only increase the cost to</p>	See relief sought in section 1.2.

ID	Proposed provision	Support /Oppose	Submission	Requested relief
			<p>Fire and Emergency but restrict the design and built form of their future district offices and resourcing garage.</p> <p>Therefore, it is sought the 91 Chester Street East is removed from RHA 2. It is further requested that Appendices 9.3.7.7.1, 9.3.7.8.1 and 9.3.7.9.1 are updated to reflect the removal of the site.</p>	
22	Appendix 9.3.7.7.1 – Proposed Plan Change 13 – Chester Street East / Dawson Street HA2	Oppose	<p>As abovementioned, it is sought that 91 Chester Street East is removed from Heritage area 2. Therefore, Appendix 9.3.7.7.1 would need to be updated accordingly.</p>	See relief sought in section 1.2.
Chapter 13: Specific Purpose Zone				
Sub-chapter 13.6 Specific Purpose (School) Zone				
23	13.6.4.2.7 – Water Supply for firefighting	Support	<p>Fire and Emergency support activities within the Specific Purpose (School) Zone being subject to 13.6.4.2.7.</p> <p>This is further supported by existing matter of discretion 13.6.5.3 Water supply for firefighting which requires consideration of whether sufficient firefighting water supply is available to ensure the safety of people and property in the zone, as well as neighbouring properties, in the event of fire.</p> <p>Fire and Emergency acknowledge that the requirement to limited notify the 'New Zealand Fire Service Commission' (now Fire and Emergency New Zealand) has been removed. Fire and Emergency recognise that this does not remove the requirement to comply with the performance standard and therefore is not opposed to the removal of 13.6.4.2.7.</p>	Retain as notified.
Chapter 14: Residential				
Sub-Chapter 14.4 – 14.3 – Introduction / Objectives and Policies				
24	14.2.3.8 Policy – Fire fighting water capacity	Support	<p>Fire and Emergency supports policy 14.2.3.8 that requires residential developments to have sufficient water supply for firefighting purposes to ensure the health and safety of people and communities.</p>	Retain as notified.
25	New policy	New		Add new policy:

ID	Proposed provision	Support /Oppose	Submission	Requested relief
			Fire and Emergency seeks new policies in relation to the development in medium density residential zone, high density residential zone and the future urban zone. These zones will enable extensive new development around existing fire stations. Fire and Emergency are seeking that the policies recognise the existing potential effects from an emergency service facility and that their effects are not considered to constitute an adverse effect where subsequent housing intensification has occurred on neighbouring sites.	<u>14.2.6.3 Policy – Reverse Sensitivity</u> <u>a. Within Medium Density Residential areas:</u> i. <u>enable the ongoing operation, use and redevelopment of existing emergency service facilities.</u>
26	<u>New policy</u>	<u>New</u>	This could be achieved by a no complaints covenant on the neighbouring titles or a performance standard which the permitted activities need to be subject to.	Add new policy: <u>14.2.7.7 Policy – Reverse sensitivity</u> <u>a. Within High Density Residential areas:</u> i. <u>enable the ongoing operation, use and redevelopment of existing emergency service facilities.</u>
27	<u>New policy</u>	<u>New</u>		Add new policy: <u>14.2.8.8 Policy – Reverse sensitivity</u> <u>a. Within Future Urban areas:</u> i. <u>enable the ongoing operation, use and redevelopment of existing emergency service facilities.</u>
Sub-chapter 14.4 – Rules – Residential Suburban and Residential Suburban Density Transition Zone				
28	14.4.2.3 Building height	Support in part	Fire stations are typically single storied buildings of approximately 8-9m in height, and emergency service towers and communication poles can be around 12 to 15 metres in height. The emergency service towers, and communication poles serve several purposes being for hose drying, communications and training purposes on station. The need for emergency service towers and communication poles required at stations is dependent on locational and operational requirements of each station. Fire and Emergency is seeking an exemption for emergency service towers and communication poles in order to appropriately provide for the health and safety of the community by enabling the efficient	Amend as follows: 14.4.2.3 Building height a. The maximum height of any building shall be: ... Advice note: 1. See the permitted height exceptions contained within the definition of height 2. <u>Emergency service facilities, emergency service towers and communication poles are exempt from this rule.</u>

ID	Proposed provision	Support /Oppose	Submission	Requested relief
			functioning of Fire and Emergency in establishing and operating fire stations and associated structures. This exemption could either be provided under the permitted height exemptions contained within the definition or a further advice note.	
Sub-chapter 14.5 – Rules – Medium Density Residential Zone				
29	14.5.1.3 Restricted discretionary activity RD21	Support in part	<p>Fire and Emergency support the permitted activities listed in Rule 14.5.1.1 being subject to performance standard 14.5.2.14 that requires a water supply for firefighting.</p> <p>Where compliance is not achieved, Fire and Emergency support the restricted discretionary activity status and the supporting matter of discretion 14.15.3.8 that requires consideration of whether sufficient firefighting water supply is available to ensure the health and safety of the community, including neighbouring properties.</p> <p>Fire and Emergency however note an error in the numbering in 14.5.1.3 RD21 and request that this be amended as per the relief sought.</p>	<p>Amend 14.5.1.3 RD21 as follows:</p> <ol style="list-style-type: none"> Residential units that do not meet Rule 14.5.2.14 – Water supply for fire fighting. Any application arising from this rule shall not be publicly notified <p>Council's discretion is limited to:</p> <ol style="list-style-type: none"> Water supply for fire fighting – Rule 14.15.78
30	14.5.2.3 Building height and maximum number of storeys	Support in part	<p>Fire stations are typically single storied buildings of approximately 8-9m in height, and emergency service towers and communication poles can be around 12 to 15 metres in height. The emergency service towers and communication poles serve several purposes being for hose drying, communications and training purposes on station. The need for emergency service towers and communication poles required at stations is dependent on locational and operational requirements of each station.</p> <p>Fire and Emergency is seeking an exemption for emergency service facilities, emergency service towers and communication poles in order to appropriately provide for the health and safety of the community by enabling the efficient functioning of Fire and Emergency in establishing and operating fire stations and associated structures.</p>	<p>Amend as follows:</p> <p>14.5.2.3 Building height and maximum number of storeys</p> <p>...</p> <p><u>Advice note:</u></p> <ol style="list-style-type: none"> See the permitted height exceptions contained within the definition of height <u>Emergency service facilities, emergency service towers and communication poles are exempt from this rule.</u>

ID	Proposed provision	Support /Oppose	Submission	Requested relief
			This exemption could either be provided under the permitted height exemptions contained within the definition or an advice note.	
31	14.5.2.7 - Minimum building setbacks	Oppose	<p>As set out in section 1.3.4 of this submission, Fire and Emergency have concerns around the increased risk of fire spreading as a result of reduced boundary setbacks. Reduced setbacks can inhibit Fire and Emergency personnel from getting to the fire source or other emergency. The difficulty of access may also increase the time for fire to burn, thereby increasing the heat radiation in a confined area.</p> <p>Fire and Emergency acknowledge that firefighting access requirements and building setback controls are managed through the New Zealand Building Code (NZBC) however consider it important that these controls are brought to the attention of plan users (i.e. developers) early on in the resource consent process so that they can incorporate the NZBC requirements early on in their building design. Fire and Emergency therefore request that, as a minimum, an advice note is included with built form standard 14.5.2.7 directing plan users to the requirements of the NZBC.</p>	<p>Amend as follows:</p> <p><u><i>Advice note:</i></u> <i>Building setback requirements are further controlled by the Building Code. This includes the provision for firefighter access to buildings and egress from buildings. Plan users should refer to the applicable controls within the Building Code to ensure compliance can be achieved at the building consent stage. Issuance of a resource consent does not imply that waivers of Building Code requirements will be considered/granted.</i></p>
32	14.5.2.14 – Water supply for fire fighting	Support	Fire and Emergency support the introduction of 14.5.2.14(b) into the built form standard for firefighting water supply as it requires non-reticulated water supply to be compliant with the alternative firefighting water sources provisions of SNZ PAS 4509:2008.	Retain as notified.
Sub-chapter 14.6 – Rules – High Density Residential Chapter				
33	14.6.1.3. Restricted Discretionary activity RD1	Support	<p>Fire and Emergency support the permitted activities list in Rule 14.6.1.1 being subject to performance standard 14.6.2.13 that requires a water supply for firefighting.</p> <p>Where compliance is not achieved, Fire and Emergency support the restricted discretionary status and the supporting matter of discretion 14.15.8 that requires consideration of whether sufficient</p>	<p>14.6.1.3. Restricted Discretionary activity RD1</p> <p>a. Any cultural activity at 52 Rolleston Avenue (Lot 2 DP 496200), that does not meet one or more of the built form standards in Rule 14.6.2.</p>

ID	Proposed provision	Support /Oppose	Submission	Requested relief
			firefighting water supply to ensure the health and safety of the community, including neighbouring properties is provided. Fire and Emergency however note an error in the numbering in 14.6.1.3 RD1 and request this be amended as per the relief sought.	b. Any application arising from Rule 14.6.2. 42 13 shall not be publicly notified.
34	14.6.1.3. Restricted Discretionary activity RD4	Support in part	<p>Fire and Emergency support the permitted activities list in Rule 14.6.1.1 being subject to performance standard 14.6.2.13 that requires a water supply for firefighting.</p> <p>Where compliance is not achieved, Fire and Emergency support the restricted discretionary status and the supporting matter of discretion 14.15.8 that requires consideration of whether sufficient firefighting water supply to ensure the health and safety of the community, including neighbouring properties is provided.</p> <p>Fire and Emergency however note an error in the numbering in 14.6.1.6 RD4 and request this be amended as per the relief sought.</p>	<p>Amend as follows:</p> <ul style="list-style-type: none"> a. Any new building, or alteration or addition to an existing building for a retirement village that meet the following built form standards: <ul style="list-style-type: none"> i. Rule 14.6.2.1 Building height ii. Rule 14.6.2.2 Height in relation to boundary iii. Rule 14.6.2.43 Setbacks iv. Rule 14.6.2.13 Water supply for firefighting b. Any application arising from this rule shall not be limited or publicly notified. <p>Council's discretion shall be limited to the following matters: Retirement villages – Rule 14.15.10</p>
35	14.6.1.3. Restricted Discretionary activity RD5	Support in part	<p>Fire and Emergency support the permitted activities list in Rule 14.6.1.1 being subject to performance standard 14.6.2.13 that requires a water supply for firefighting.</p> <p>Where compliance is not achieved, Fire and Emergency support the restricted discretionary status and the supporting matter of discretion 14.15.8 that requires consideration of whether sufficient firefighting water supply to ensure the health and safety of the community, including neighbouring properties is provided. Fire and Emergency however note an error in the numbering in 14.6.1.3 RD5 and request this be amended as per the relief sought.</p>	<p>Amend as follows:</p> <ul style="list-style-type: none"> a. Any new building, or alteration or addition to an existing building for a retirement village that does not meet one or more of the following built form standards: <ul style="list-style-type: none"> i. 14.6.2.1 Building height ii. Rule 14.6.2.2 Height in relation to boundary iii. Rule 14.6.2.43 Setbacks iv. Rule 14.6.2.13 Water supply for firefighting b. Any application arising from Rule 14.6.2.3 shall not be limited or publicly notified. c. Any application arising from Rule 14.6.2.123 shall not be publicly notified and shall be

ID	Proposed provision	Support /Oppose	Submission	Requested relief
				limited notified only to Fire and Emergency New Zealand (absent its written approval).
36	14.6.2.1 Building height	Support in part	<p>Fire stations are typically single storied buildings of approximately 8-9m in height, and emergency service towers and communication poles can be around 12 to 15 metres in height. The emergency service towers and communication poles serve several purposes being for hose drying, communications and training purposes on station. The need for emergency service towers and communication poles required at stations is dependent on locational and operational requirements of each station.</p> <p>Fire and Emergency is seeking an exemption for emergency service facilities, emergency service towers and communication poles in order to appropriately provide for the health and safety of the community by enabling the efficient functioning of Fire and Emergency in establishing and operating fire stations and associated structures.</p> <p>This exemption could either be provided under the permitted height exemptions contained within the definition or an advice note.</p>	<p>Amend as follows:</p> <p>Advice note:</p> <ol style="list-style-type: none"> 1. See the permitted height exceptions contained within the definition of height 2. <u>Emergency service facilities, emergency service towers and communication poles are exempt from this rule.</u>
37	14.6.2.3 – Setbacks	Oppose in part	<p>As set out in section 1.3.4 of this submission, Fire and Emergency have concerns around the increased risk of fire spreading as a result of reduced boundary setbacks. Reduced setbacks can inhibit Fire and Emergency personnel from getting to the fire source or other emergency. The difficulty of access may also increase the time for fire to burn, thereby increasing the heat radiation in a confined area.</p> <p>Fire and Emergency acknowledge that firefighting access requirements and building setback controls are managed through the New Zealand Building Code (NZBC) however consider it important that these controls are brought to the attention of plan users (i.e. developers) early on in the resource consent process so that they can incorporate the</p>	<p>Amend as follows:</p> <p>Advice note:</p> <p><u>Building setback requirements are further controlled by the Building Code. This includes the provision for firefighter access to buildings and egress from buildings. Plan users should refer to the applicable controls within the Building Code to ensure compliance can be achieved at the building consent stage. Issuance of a resource consent does not imply that waivers of Building Code requirements will be considered/granted.</u></p>

ID	Proposed provision	Support /Oppose	Submission	Requested relief
			NZBC requirements early on in their building design. Fire and Emergency therefore request that, as a minimum, an advice note is included with built form standard 14.6.2.3 directing plan users to the requirements of the NZBC.	
38	14.6.2.13 - Water supply for firefighting	Support	Fire and Emergency support the introduction of 14.6.2.13(b) into the built form standard for firefighting water supply as it requires non-reticulated water supply to be provided in accordance with SNZ PAS 4509:2008.	Retain as notified.
Sub-chapter 14.7 – Rules - Residential Hills Zone				
39	14.7.1.3 Restricted discretionary activities RD18	Support in part	<p>Fire and Emergency support the permitted activities list in Rule 14.7.1.1 being subject to performance standard 14.7.2.11 that requires a water supply for firefighting.</p> <p>Where compliance is not achieved, Fire and Emergency support the restricted discretionary status and the supporting matter of discretion 14.15.8 that requires consideration of whether sufficient firefighting water supply to ensure the health and safety of the community, including neighbouring properties is provided.</p> <p>Fire and Emergency however note an error in the numbering in 14.7.1.3 RD18 and request this be amended as per the relief sought.</p>	<p>Amend as follows:</p> <p>Council's discretion shall be limited to the following matter:</p> <p>a. Water supply for fire fighting – Rule 14.15.78</p>
Sub-chapter 14.8 – Rules – Residential Banks Peninsula Zone				
40	14.8.1.3 Restricted discretionary RD9	Support in part	<p>Fire and Emergency support the permitted activities list in Rule 14.8.1.3 being subject to performance standard 14.8.2.7 that requires a water supply for firefighting.</p> <p>Where compliance is not achieved, Fire and Emergency support the restricted discretionary status and the supporting matter of discretion 14.15.8 that requires consideration of whether sufficient firefighting water supply to ensure the health and safety of the community, including neighbouring properties is provided.</p>	<p>Amend as follows:</p> <p>Council's discretion shall be limited to the following matter:</p> <p>a. Water supply for fire fighting – Rule 14.15.78</p>

ID	Proposed provision	Support /Oppose	Submission	Requested relief
			Fire and Emergency however note an error in the numbering in 14.8.1.3 RD9 and request this be amended as per the relief sought	
Sub-chapter 14.9 – Rules – Residential Large Lot Zone				
41	14.9.1.3. Restricted discretionary activities RD15	Support in part	<p>Fire and Emergency support the permitted activities list is 14.9.1.1 being subject to performance standard 14.9.2.8 that requires a water supply for firefighting. Where compliance is not achieved, Fire and Emergency support the restricted discretionary status and the supporting matter of discretion 14.15.8 that requires consideration of whether sufficient firefighting water supply to ensure the health and safety of the community, including neighbouring properties is provided.</p> <p>Fire and Emergency however note an error in the numbering in 14.9.1.3 RD15 and request this be amended as per the relief sought.</p>	<p>Amend as follows:</p> <p>Council's discretion is restricted to:</p> <p>a. Water supply for fire fighting – Rule 14.15-78</p>
42	14.9.2.5 Minimum building setbacks from internal boundaries	Oppose in part	<p>As set out in section 1.3.4 of this submission, Fire and Emergency have concerns around the increased risk of fire spreading as a result of reduced boundary setbacks. Reduced setbacks can inhibit Fire and Emergency personnel from getting to the fire source or other emergency. The difficulty of access may also increase the time for fire to burn, thereby increasing the heat radiation in a confined area.</p> <p>Fire and Emergency acknowledge that firefighting access requirements and building setback controls are managed through the New Zealand Building Code (NZBC) however consider it important that these controls are brought to the attention of plan users (i.e. developers) early on in the resource consent process so that they can incorporate the NZBC requirements early on in their building design. Fire and Emergency therefore request that, as a minimum, an advice note is included with built form standard 14.9.2.5 directing plan users to the requirements of the NZBC.</p>	<p>Amend as follows:</p> <p><u><i>Advice note:</i></u></p> <p><u><i>Building setback requirements are further controlled by the Building Code. This includes the provision for firefighter access to buildings and egress from buildings. Plan users should refer to the applicable controls within the Building Code to ensure compliance can be achieved at the building consent stage. Issuance of a resource consent does not imply that waivers of Building Code requirements will be considered/granted.</i></u></p>

ID	Proposed provision	Support /Oppose	Submission	Requested relief
Sub-chapter 14.12 Rules – Future Urban Zone				
43	14.12.2.1 Building height	Oppose in part	<p>Fire stations are typically single storied buildings of approximately 8-9m in height, and emergency service towers and communication poles can be around 12 to 15 metres in height. The emergency service towers, and communication poles serve several purposes being for hose drying, communications and training purposes on station. The need for emergency service towers and communication poles required at stations is dependent on locational and operational requirements of each station.</p> <p>Fire and Emergency is seeking an exemption for emergency service facilities, emergency service towers and communication poles in order to appropriately provide for the health and safety of the community by enabling the efficient functioning of Fire and Emergency in establishing and operating fire stations and associated structures.</p> <p>This exemption could either be provided under the permitted height exemptions contained within the definition or an advice note.</p>	<p>Amend as follows:</p> <p><u>Advice note:</u></p> <ol style="list-style-type: none"> 1. See the permitted height exceptions contained within the definition of height 2. <u>Emergency service facilities, emergency service towers and communication poles are exempt from this rule.</u>
44	14.12.2.5 Minimum building setbacks from internal boundaries and railway lines	Oppose in part	<p>As set out in section 1.3.4 of this submission, Fire and Emergency have concerns around the increased risk of fire spreading as a result of reduced boundary setbacks. Reduced setbacks can inhibit Fire and Emergency personnel from getting to the fire source or other emergency. The difficulty of access may also increase the time for fire to burn, thereby increasing the heat radiation in a confined area.</p> <p>Fire and Emergency acknowledge that firefighting access requirements and building setback controls are managed through the New Zealand Building Code (NZBC) however consider it important that these controls are brought to the attention of plan users (i.e. developers) early on in the resource consent process so that they can incorporate the NZBC requirements early on in their building design.</p>	<p>Amend as follows:</p> <ol style="list-style-type: none"> a. The minimum building setback from internal boundaries shall be as follows: e. b. For a retirement village or a comprehensive residential development, this rule applies only to the internal boundaries on the perimeter of the entire development. d. c. For the purposes of this rule, this excludes guttering up to 200mm in width from the wall of a building. <p><u>Advice note:</u> <u>Building setback requirements are further controlled by the Building Code. This includes the provision for firefighter access to buildings and egress from</u></p>

ID	Proposed provision	Support /Oppose	Submission	Requested relief
			<p>Fire and Emergency therefore request that, as a minimum, an advice note is included with built form standard 14.12.2.5 directing plan users to the requirements of the NZBC.</p> <p>For clarity, Fire and Emergency request that the clauses are updated to be in sequential order.</p>	<p><u>buildings. Plan users should refer to the applicable controls within the Building Code to ensure compliance can be achieved at the building consent stage. Issuance of a resource consent does not imply that waivers of Building Code requirements will be considered/granted.</u></p>
Sub-chapter 14.15 Rules – Matters of control and discretion				
45	14.15.1 - Residential design principles	Support in part	Fire and Emergency seeks reference to emergency access on site.	<p>Amend as follows:</p> <p>...</p> <p>g. Access, parking and servicing</p> <ol style="list-style-type: none"> i. Whether the development provides for good, safe access and integration of space for pedestrian movement, cyclist servicing, and parking (where provided). ii. The relevant considerations are the extent to which the development: <ol style="list-style-type: none"> A. integrates access in a way that is safe for all users, and offers direct and convenient access for pedestrians and cyclists from the street to the front door of each unit; B. provides effective physical separation between vehicles and any dedicated pedestrian access; C. when parking areas and garages are provided, these are designed and located in a way that does not dominate the development, particularly when viewed from the street or other public open spaces; D. when no on-site car parking is provided, the movement of people and car-free modes of travel are facilitated, including accesses that are of sufficient width and standard of formation to be used by people with differing mobility needs; and

ID	Proposed provision	Support /Oppose	Submission	Requested relief
				<p>E. provides for suitable storage (including bike storage) and service spaces which are conveniently accessible for people with differing mobility needs, safe and/or secure, and located and/or designed to minimise adverse effects on occupants, neighbours and public spaces.</p> <p>iii. <u>Whether the development provides for appropriate emergency access on/to the site:</u></p> <p><u>A. The extent to which access to the on-site alternative firefighting water supply complies with SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice.</u></p> <p><u>B. The extent to which developments provide for emergency service access including pedestrian accessways that are clear, unobstructed and well lit</u></p> <p><u>C. The extent to which wayfinding for different properties on a development are clear in day and night is provided.</u></p>
46	14.15.3 Impacts on neighbouring property	Support in part	<p>Fire and Emergency note the importance to maintain firefighting water supply pressure throughout high rise buildings. Fire and Emergency seek that Council consider this as a matter of discretion when compliance is not achieved.</p> <p>Fire and Emergency are concerned by the risk of fire spreading due to setbacks from boundaries. It can inhibit Fire and Emergency personnel from getting to the fire source.</p> <p>Fire and Emergency seek that Council consider this as an additional matter of discretion as outlined in the relief sought.</p>	<p>Amend as follows:</p> <p>...</p> <p><u>viii. Fire risk mitigation incorporated to avoid horizontal spread of fire across boundaries; and</u></p> <p><u>ix. Provision of suitable firefighting water supply and pressure.</u></p>
47	14.15.8 - Water supply for fire fighting	Support	Fire and Emergency support the matter of discretion 14.15.8 that requires consideration of whether sufficient firefighting water supply to ensure the	Retain as notified.

ID	Proposed provision	Support /Oppose	Submission	Requested relief
			health and safety of the community, including neighbouring properties is provided.	
48	14.15.27 Character Area Overlay	Oppose in part	<p>Fire and Emergency are seeking the removal of 91 Chester Street East from the RHA 2 to enable development within the site without potential functional, time and cost constraints. This will enable Fire and Emergency to carry out their duty to provide for the health and safety of people and communities in Christchurch.</p> <p>For clarity however, Fire and Emergency seeks that the clauses are appropriately updated to be in sequential order where a clause has been removed or added.</p>	See sought relief in section 1.2.
Chapter 15 – Commercial				
49	15.2.4 Objective - Urban form, scale and design outcomes	Support	Fire and Emergency support the urban form, scale and design outcomes objective as 15.2.4. (a) ii. recognises the functional and operational requirements of activities and the anticipated built form. As Emergency service facilities are permitted within this zone, it is considered that the functional and operational requirements of Fire and Emergency are anticipated in this zone.	Retain as notified.
15.4 Rules – Town Centre Zone				
50	15.4.2.2 Maximum building height	Support	Fire stations are typically single storied buildings of approximately 8-9m in height, and emergency service towers and communication poles can be around 12 to 15 metres in height. The emergency service towers, and communication poles serve several purposes being for hose drying, communications and training purposes on station. The need for emergency service towers and communication poles required at stations is dependent on locational and operational requirements of each station.	Retain as notified.
51	15.4.2.8 - Water supply for fire fighting	Support	Fire and Emergency support the introduction of 15.4.2.8(b) into the built form standard for firefighting water supply as it requires non-reticulated water	Retain as notified.

ID	Proposed provision	Support /Oppose	Submission	Requested relief
			supply to be compliant with the alternative firefighting water sources provisions of SNZ PAS 4509:2008.	
15.5 Rules – Local Centre Zone				
52	15.5.2.2 - Maximum building height	Support in part.	<p>Fire stations are typically single storied buildings of approximately 8-9m in height, and emergency service towers and communication poles can be around 12 to 15 metres in height. The emergency service towers, and communication poles serve several purposes being for hose drying, communications and training purposes on station. The need for emergency service towers and communication poles required at stations is dependent on locational and operational requirements of each station.</p> <p>Fire and Emergency is seeking an exemption for emergency service facilities, emergency service towers and communication poles in order to appropriately provide for the health and safety of the community by enabling the efficient functioning of Fire and Emergency in establishing and operating fire stations and associated structures.</p> <p>This exemption could either be provided under the permitted height exemptions contained within the definition or an advice note.</p>	<p>Amend as follows:</p> <p><u>Advice note:</u></p> <ol style="list-style-type: none"> 1. <u>See the permitted height exceptions contained within the definition of height</u> 2. <u>Emergency service facilities, emergency service towers and communication poles are exempt from this rule.</u>
53	15.5.2.8 - Water supply for fire fighting	Support	Fire and Emergency support the inclusion of the built form standard 15.5.2.8(b) which requires non-reticulated water supply for firefighting be provided in accordance with SNZ PAS 4509:2008.	Retain as notified.
15.6 Rules – Neighbourhood Centre Zone				
54	15.6.2.1 - Maximum building height	Support in part	<p>Fire stations are typically single storied buildings of approximately 8-9m in height, and emergency service towers and communication poles can be around 12 to 15 metres in height. The emergency service towers, and communication poles serve several purposes being for hose drying, communications and training purposes on station. The need for emergency service towers and</p>	<p>Amend as follows:</p> <p><u>Advice note:</u></p> <ol style="list-style-type: none"> 1. <u>See the permitted height exceptions contained within the definition of height</u> 2. <u>Emergency service facilities, emergency service towers and communication poles are exempt from this rule.</u>

ID	Proposed provision	Support /Oppose	Submission	Requested relief
			<p>communication poles required at stations is dependent on locational and operational requirements of each station.</p> <p>Fire and Emergency is seeking an exemption for emergency service facilities, emergency service towers and communication poles in order to appropriately provide for the health and safety of the community by enabling the efficient functioning of Fire and Emergency in establishing and operating fire stations and associated structures.</p> <p>This exemption could either be provided under the permitted height exemptions contained within the definition or an advice note.</p>	
55	15.6.2.7 - Water supply for fire fighting	Support	Fire and Emergency support the inclusion of built form standard 15.6.2.7(b) which requires non-reticulated water supply for firefighting be provided in accordance with SNZ PAS 4509:2008.	Retain as notified.
15.7 Rules – Commercial Banks Peninsula Zone				
56	15.7.2.4 - Minimum building setback from the boundary with a Residential Zone	Support	Fire and Emergency support the minimum setbacks from the boundary specified in Rule 15.7.2.4(a) as they may enable Fire and Emergency personnel to get to the fire source and reduce the risk of fire spread.	Retain as notified.
57	15.7.2.7 - Water supply for fire fighting	Support	Fire and Emergency support the inclusion of built form standard 15.7.2.7(b) which requires non-reticulated water supply for firefighting be provided in accordance with SNZ PAS 4509:2008.	Retain as notified.
15.8 Rules – Large Format Retail Zone				
58	15.8.1.3 Restricted discretionary activities RD1	Support	<p>Fire and Emergency support the permitted activities list is Rule 15.8.1.1 being subject to performance standard 15.8.2.7 that requires a water supply for firefighting.</p> <p>Where compliance is not achieved, Fire and Emergency support the restricted discretionary status and the supporting matter of discretion 15.14.3.8 that requires consideration of whether sufficient firefighting water supply to ensure the health and</p>	Retain as notified.

ID	Proposed provision	Support /Oppose	Submission	Requested relief
			safety of the community, including neighbouring properties is provided.	
59	15.8.2.7 Water supply for fire fighting	Support in part	<p>Fire and Emergency supports the inclusion of built form standard 15.8.2.7(b) which requires water supply for firefighting be provided in accordance with SNZ PAS 4509:2008.</p> <p>Fire and Emergency seek that 'New Zealand Fire Service Commission' is amended to 'Fire and Emergency New Zealand'.</p>	<p>Amend as follows:</p> <p>c. Any application arising from this rule shall not be publicly notified and shall be limited notified only to New Zealand Fire Service Commission <u>Fire and Emergency New Zealand</u> (absent its written approval).</p>
15.9 Rules – Commercial Office Zone				
60	15.9.1.3 Restricted discretionary activities RD1	Support	<p>Fire and Emergency support the permitted activities list is Rule 15.9.1.1 being subject to performance standard 15.9.2.7 that requires a water supply for firefighting.</p> <p>Where compliance is not achieved, Fire and Emergency support the restricted discretionary status and the supporting matter of discretion 15.14.3.8 that requires consideration of whether sufficient firefighting water supply to ensure the health and safety of the community, including neighbouring properties is provided.</p>	Retain as notified.
15.10 Rules – Mixed Use Zone				
61	15.10.1.3 Restricted discretionary activities RD1	Support	<p>Fire and Emergency support the permitted activities list is Rule 15.10.1.1 being subject to performance standard 15.10.2.7 that requires a water supply for firefighting.</p> <p>Where compliance is not achieved, Fire and Emergency support the restricted discretionary status and the supporting matter of discretion 15.14.3.8 that requires consideration of whether sufficient firefighting water supply to ensure the health and safety of the community, including neighbouring properties is provided.</p>	Retain as notified.
62	15.10.2.1 Maximum building height	Support	Fire stations are typically single storied buildings of approximately 8-9m in height, and emergency service towers and communication poles can be around 12 to 15 metres in height. The emergency	Retain as notified.

ID	Proposed provision	Support /Oppose	Submission	Requested relief
			service towers, and communication poles serve several purposes being for hose drying, communications and training purposes on station. The need for emergency service towers and communication poles required at stations is dependent on locational and operational requirements of each station.	
63	15.10.2.3 - Minimum building setback from residential zones and internal boundaries	Support	Fire and Emergency support the minimum setbacks from the boundary specified in Rule 15.10.2.3(a) as they may enable Fire and Emergency personnel to get to the fire source and reduce the risk of fire spread.	Retain as notified.
64	15.10.2.7 - Water supply for fire fighting	Support	Fire and Emergency support the inclusion of Rule 15.10.2.7(b) which requires non-reticulated water supply for firefighting be provided in accordance with SNZ PAS 4509:2008.	Retain as notified.
65	15.10.2.9 - Minimum standards for Comprehensive Residential Development	Support in part	Fire and Emergency seeks reference to emergency access on site to the extent that it requires either a combined vehicle-pedestrian access or a dedicated pedestrian access with associated minimum standards. Fire and Emergency request that these minimum standards be amended to provide for emergency responder access for reasons set out in Section 1.3.1 above.	<p>Amend as follows:</p> <ul style="list-style-type: none"> a. All shared pedestrian access ways within and through a site shall: <ul style="list-style-type: none"> i. have a minimum width of <ul style="list-style-type: none"> A. 3 metres on a straight accessway including excluding planting. B. 6.2 metres on a curved or cornered accessway C. 4.5m space to position the ladder and perform operational tasks. ii. The width for pedestrian access shall be clear of any fencing, storage or servicing, except security gates, where necessary. iii. provide wayfinding for different properties on a development are clear in day and night.

15.11 Rules – City Centre Zone

ID	Proposed provision	Support /Oppose	Submission	Requested relief
66	15.11.1.3. Restricted discretionary activity RD5	Support	Fire and Emergency support the permitted activities list in Rule 15.11.1.1 being subject to performance standard 15.11.2.13 that requires a water supply for firefighting. Where compliance is not achieved, Fire and Emergency support the restricted discretionary status and the supporting matter of discretion 15.14.3.8 that requires consideration of whether sufficient firefighting water supply to ensure the health and safety of the community, including neighbouring properties is provided.	Retain as notified.
67	15.11.2.13 - Water supply for fire fighting	Support in part	Fire and Emergency support the addition of 15.11.2.13(b) which requires non-reticulated water supply for firefighting be provided in accordance with SNZ PAS 4509:2008. A minor amendment is sought to 15.11.2.13(c) to update reference from 'New Zealand Fire Service Commission' to 'Fire and Emergency New Zealand'.	Amend as follows: c. Any application arising from this rule shall not be publicly notified. Limited notification, if required, shall only be to <u>Fire and Emergency New Zealand</u> the New Zealand Fire Service Commission (absent its written approval).
15.12 Rules – Central City Mixed Use Zone				
68	15.12.1.3 Restricted discretionary activities RD2	Support	Fire and Emergency support the permitted activities listed in Rule 15.12.1.1 being subject to performance standard 15.12.2.8 that requires a water supply for firefighting. Where compliance is not achieved, Fire and Emergency support the restricted discretionary activity status and the supporting matter of discretion 15.14.3.8 that requires consideration of whether sufficient firefighting water supply is available to ensure the health and safety of the community, including neighbouring properties.	Retain as notified.
69	15.12.2.7 - Minimum setback from the boundary with a residential zone or from an internal boundary	Support	Fire and Emergency support the minimum setbacks from the boundary specified in Rule 15.12.2.7(a) as they may enable Fire and Emergency personnel to get to the fire source and reduce the risk of fire spread.	Retain as notified.
70	15.12.2.8 Water supply for fire fighting	Support in part	Fire and Emergency support the addition of Rule 15.12.2.8(b) which requires non-reticulated water	Amend as follows:

ID	Proposed provision	Support /Oppose	Submission	Requested relief
			supply for firefighting beprovided in accordance with SNZ PAS 4509:2008. A minor amendment is sought to 15.12.2.8(c) to update reference from New Zealand Fire Service Commission to 'Fire and Emergency New Zealand'.	..; Any application arising from this rule shall not be publicly notified and shall be limited notified only to New Zealand Fire Service Commission <u>Fire and Emergency New Zealand</u> (absent its written approval).
15.13 Rules – Central City Mixed Use Zone (South Frame)				
71	15.13.1.3 Restricted discretionary activities RD5	Support	Fire and Emergency support the permitted activities listed in 15.13.1 being subject to performance standard 15.13.2.9 that requires a water supply for firefighting. Where compliance is not achieved, Fire and Emergency support the restricted discretionary activity status and the supporting matter of discretion 15.14.3.8 that requires consideration of whether sufficient firefighting water supply is available to ensure the health and safety of the community, including neighbouring properties.	Retain as notified.
72	15.13.2.9 - Water supply for fire fighting	Support in part	Fire and Emergency support the addition of 15.13.2.9(b) which ensures that non-reticulated water supply for firefighting is provided in accordance with SNZ PAS 4509:2008. A minor amendment is sought to 15.13.2.9(c) to update reference from New Zealand Fire Service Commission to 'Fire and Emergency New Zealand'.	Amend as follows: ... Any application arising from this rule shall not be publicly notified and shall be limited notified only to New Zealand Fire Service Commission <u>Fire and Emergency New Zealand</u> (absent its written approval).

Please click on the link below to view the document

[https://makeasubmission.ccc.govt.nz:443/manage/Docs/PID_294/294_15823TQN60A_Fire and Emergency New Zealand - Small Fiona - Small Fiona - Plan Change 14 to Christchurch Plan Submission - FENZ.PDF](https://makeasubmission.ccc.govt.nz:443/manage/Docs/PID_294/294_15823TQN60A_Fire_and_Emergency_New_Zealand_-_Small_Fiona_-_Small_Fiona_-_Plan_Change_14_to_Christchurch_Plan_Submission_-_FENZ.PDF)

Details of submitter No: 1040 - Neil McNulty

Submitter:	Neil McNulty
Submitter Address:	
Behalf of:	

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 02/05/2023

First name: Neil

Last name: McNulty

On behalf of:

Postal address:

Email:

Daytime Phone:

Would you like to present your submission in person at a hearing?

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Consultation Document Submissions

Provision: Chapter 10 Designations and Heritage Orders

Oppose

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

I ask that the council do not make Forbes Street a RHA due to the above factors. There is in fact little genuine heritage fabric left in this street due to the nature of the current buildings, a lot which have been bastardized over the years and are in process of slow decay. A lot of good aesthetic development has happened in Sydenham over the last couple of years, Forbes St would be a better street aesthetically and socially if there was no restrictions placed on it in the form of a RHA.

My submission is that:

My partner and I have lived at 29 Forbes Street for the last 34 years. It is an Edwardian Villa which has been totally renovated, in part due to the earthquakes. The council is proposing to turn Forbes Street into a RHA as it is considered a turn of the century (20th) due to it being an example of working class area. Most of the heritage buildings are in various state of repair/disrepair, consequently the buildings on this street do have a limited shelf life. The owners of some of these buildings do not intend to or have the economic ability to repair and maintain these buildings in an optimal and original condition. In the current climate crisis (as recently seen with recent cyclone) Sydenham and this street in particular is ripe for redevelopment which is in keeping with the Govt housing strategy of intensification. Sydenham is suited to this being close to the CBD with good public transport, easy walking, cycling and e bikes/scooters along with good access to green spaces and other amenities.

Details of submitter No: 1041 - Ruth Morrison

Submitter:	Ruth Morrison
Submitter Address:	
Behalf of:	Morrison Family

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 02/05/2023

First name: Ruth

Last name: Morrison

On behalf of:

Postal address:

Email:

Daytime Phone:

Would you like to present your submission in person at a hearing?

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Consultation Document Submissions

Provision: Chapter 9 Natural and Cultural Heritage

Seek Amendment

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

Keep the area around Paparoa St, Dormer St, Rayburn Ave and Perry St as heritage areas, as per the decision in 2016. The area is a long established War Memorial area with beautiful trees and an important history. How about making sure all areas identified in 2016 as heritage automatically stay that way now? And others added as needed? Stop making residents go over the same ground again and again trying to keep the 'Garden City' at least a bit beautiful - life is busy and a council should be sensible enough to save a city's heritage on it's own. Our family of 7 all want our heritage area kept.

My submission is that:

Keep the area around Paparoa St, Dormer St, Rayburn Ave and Perry St as heritage areas, as per the decision in 2016. The area is a long established War Memorial area with beautiful trees and an important history. How about making sure all areas identified in 2016 as heritage automatically stay that way now? And others added as needed? Stop making residents go over the same ground again and again trying to keep the 'Garden City' at least a bit beautiful - life is busy and a council should be sensible enough to save a city's heritage on it's own. Our family of 7 all want our heritage area kept.

Provision: Chapter 10 Designations and Heritage Orders

Seek Amendment

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

Keep the area around Paparoa St, Dormer St, Rayburn Ave and Perry St as heritage areas, as per the decision in 2016. The area is a long established War Memorial area with beautiful trees and an important history. How about making sure all areas identified in 2016 as heritage automatically stay that way now? And others added as needed? Stop making residents go over the same ground again and again trying to keep the 'Garden City' at least a bit beautiful - life is busy and a council should be sensible enough to save a city's heritage on it's own. Our family of 7 all want our heritage area kept.

My submission is that:

Keep the area around Paparoa St, Dormer St, Rayburn Ave and Perry St as heritage areas, as per the decision in 2016. The area

is a long established War Memorial area with beautiful trees and an important history. How about making sure all areas identified in 2016 as heritage automatically stay that way now? And others added as needed? Stop making residents go over the same ground again and again trying to keep the 'Garden City' at least a bit beautiful - life is busy and a council should be sensible enough to save a city's heritage on it's own. Our family of 7 all want our heritage area kept.

Details of submitter No: 1045 - Ross Boswell

Submitter:	Ross Boswell
Submitter Address:	

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 03/05/2023

First name: Ross

Last name: Boswell

Postal address:

Email:

Daytime Phone:

Would you like to present your submission in person at a hearing?

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Consultation Document Submissions

Provision: Chapter 9 Natural and Cultural Heritage

Seek Amendment

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

Add the memorial in Jane Deans Close to the list of recognised heritage sites.

My submission is that:

The 20th Battalion and 20th Regiment memorial in Jane Deans Close should be recognised as a heritage site. An annual anzac Day service is held at this site.

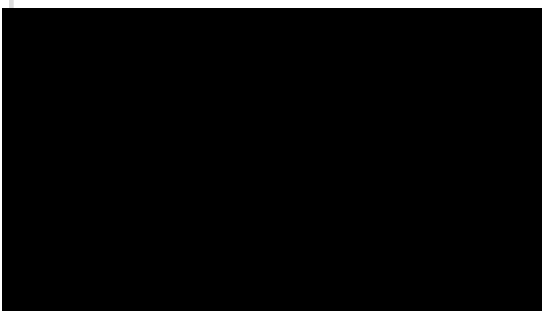
Our proposed Housing and Business Choice and Heritage Plan Changes (13 & 14)

Submitter Details

Submission Date: 03/05/2023

First name: Christine **Last name:** Whybrew

Preferred method of contact Email



Daytime Phone:

I could not
Gain an advantage in trade competition through this submission

I am not
directly affected by an effect of the subject matter of the submission that :
a. adversely affects the environment, and
b. does not relate to the trade competition or the effects of trade competitions.

Note to person making submission:

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991

Would you like to present your submission in person at a hearing?

- ☒ Yes
- ☐ I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Additional requirements for hearing:

Attached Documents

File
HNZPT submission on Plan Changes 13 and 14
HNZPT submission on Plan Changes 13 and 14 - APPENDIX 1
HNZPT submission on Plan Changes 13 and 14 - APPENDIX 2

APPENDIX 1 - SUBMISSION OF HERITAGE NEW ZEALAND POUHERE TAONGA ON PLAN CHANGE 13 OF THE CHRISTCHURCH DISTRICT PLAN

HNZPT Ref #	Provision to which submission relates	Support or Oppose	Reasons for submission	Decision sought from Council (Retain / Amend / Delete)
001	Chapter 2 / Abbreviations and Definitions / Definitions / Alteration of a heritage item	Support	HNZPT supports these changes which strengthen and simplify the definition of <i>alteration</i> . We consider this to be beneficial in terms of reducing ambiguity and providing clear and concise guidance for users.	Retain as proposed.
002	Chapter 2 / Abbreviations and Definitions / Definitions / Contributory building	Support	HNZPT supports the inclusion of the definition for a <i>contributory building</i> in relation to heritage areas. We consider the identification and clear distinction between buildings that do and do not contribute to a heritage area will ensure the heritage areas are protected where necessary but not overly restrictive.	Retain as proposed.
003	Chapter 2 / Abbreviations and Definitions / Definitions / Defining building	Support	HNZPT supports the inclusion of the definition for a <i>defining building</i> in relation to heritage areas. We consider the identification of buildings of primary importance avoids ambiguity, and affords protection where necessary whilst avoiding unnecessary restrictions to other buildings.	Retain as proposed.
004	Chapter 2 / Abbreviations and Definitions / Definitions / Heritage fabric	Oppose	HNZPT suggests the later fabric referred to in part (b) could be considered as part of the 'later material' included in part (a) so its specific inclusion is not required.	Amend HNZPT requests the removal of part (b): Heritage fabric: in relation to Sub-chapter 9.3 Historic Heritage of Chapter 9 Natural and Cultural Heritage, means any physical aspect of a heritage item, heritage setting, or heritage area which contributes to its heritage values. In the case of the interior of a heritage item, it

				<p>includes only that heritage fabric which is protected by Appendix 9.3.7.2 Schedule of significant historic heritage for that heritage item. Heritage fabric may include:</p> <ul style="list-style-type: none"> a. original and later material and detailing which forms part of, or is attached to, the interior or exterior of a building, structure or feature; b. later fabric introduced as part of repairs, restoration or reconstruction; € <u>b.</u> the patina of age resulting from the weathering and wear of construction material over time; £ <u>c.</u> fixtures and fittings that form part of the design or significance of a heritage item, but excludes inbuilt museum and artwork exhibitions and displays; and € <u>d.</u> for a heritage item which is an open space, built or other elements independent of buildings, structures or features, such as historic paths, paving, trees, and garden layout. <p>Heritage fabric excludes fabric certified in accordance with Appendix 9.3.7.6 Certification Certificate of non-heritage fabric.</p>
005	Chapter 2 / Abbreviations and Definitions / Definitions / Heritage fabric	Support	HNZPT supports the clarification at the end of this definition, that heritage fabric excludes fabric that has certification as non-heritage fabric.	Retain this section as proposed.

006	Chapter 2 / Abbreviations and Definitions / Definitions / Heritage Professional	Support	HNZPT supports the amendment of the definition of heritage professional, in particular the requirement to have membership of an organisation for heritage professionals such as ICOMOS New Zealand, New Zealand Archaeological Association, or Pū Manaaki Kahurangi New Zealand Conservators of Cultural Materials.	Retain as proposed.
007	Chapter 2 / Abbreviations and Definitions / Definitions / Intrusive building or site	Support	HNZPT supports the inclusion of <i>Intrusive building or site</i> within the District Plan in relation to proposed heritage areas. The identification of buildings or sites that detract from or are inconsistent with the heritage values and significance of heritage areas provides a greater level of flexibility for owners and potential for more appropriate development that could in turn benefit the heritage area.	Retain as proposed.
008	Chapter 2 / Abbreviations and Definitions / Definitions / Neutral building or site	Support	HNZPT supports the inclusion of <i>Neutral building or site</i> within the District Plan in relation to proposed heritage areas. The identification of buildings or sites that neither support nor detract from the heritage values and significance of the heritage area provides a greater level of flexibility for owners and greater certainty for Council when considering applications for development.	Retain as proposed.
009	Chapter 8 / Subdivision, Development and Earthworks / 8.6.1 Minimum net site area and dimension	Support	HNZPT supports the increased minimum net site area for the Heritage Areas specified under additional standards. This reflects a level of assessment resulting in a lot size appropriate to the character and significance of the area.	Retain as proposed.
010	Chapter 8 / Subdivision, Development and Earthworks / 8.9.2.1 Permitted activities –	Support	HNZPT supports the requirement for details of temporary protection measures to be provided to Council’s Heritage team for comment at least 5 working days prior to the	Retain as proposed.

	earthworks / P1 Activity Standard		works commencing. This provision will help to mitigate any potential physical effects on the heritage item.	
011	Chapter 9 / 9.3 Historic Heritage / Objectives and Policies / 9.3.2.2.5 Policy - Ongoing use of scheduled historic heritage	Support	<p>HNZPT supports the provision for the ongoing use and adaptive reuse of scheduled historic heritage, which also includes defining buildings and contributory buildings within identified heritage Areas.</p> <p>HNZPT supports the removal of 'recognising that heritage settings and Significant heritage items are potentially capable of accommodating a greater degree of change than Highly Significant heritage items' in part b)i.</p>	Retain as proposed.
012	Chapter 9 / 9.3 Historic Heritage / Objectives and Policies / 9.3.2.2.8 Policy – Demolition of scheduled historic heritage	Support	HNZPT supports the addition of 'and the heritage item would no longer meet the threshold for scheduling' in part a)ii of 9.3.2.2.8. We consider this wording adds a beneficial additional layer of assessment.	Retain point a)ii of 9.3.2.2.8 as proposed.
013	Chapter 9 / 9.3 Historic Heritage / Objectives and Policies / 9.3.2.2.8 Policy – Demolition of scheduled historic heritage	Oppose	<p>HNZPT recommends the inclusion of a new clause in 9.3.2.2.8, requiring that should a heritage item be removed, the setting will be assessed to determine whether it should be retained/rescheduled as an open space or heritage item. In many cases the main physical structure holds only part of the heritage values of an item, particularly where there may be ancillary features or intangible heritage values.</p> <p>We note that this does sometimes occur in practice, e.g. Former Lyttelton Police Station Cells.</p>	<p>Amend HNZPT requests the addition of a new clause in 9.3.2.2.8: <u>vi. Should demolition be approved, whether the setting should be retained/rescheduled as an open space heritage item.</u></p>

014	Chapter 9 / 9.3.4 Rules - Historic heritage / 9.3.4.1.1 Permitted activities / P1	Support	HNZPT supports the removal of activity specific standard a)ii in 9.3.4.1.1 P1 which we consider to be overly restrictive.	Retain as proposed.
015	Chapter 9 / 9.3.4 Rules - Historic heritage / 9.3.4.1.1 Permitted activities / P2	Support	<p>HNZPT supports the inclusion of activity specific standard a) in activity P2, requiring the provision of a scope of works and temporary protection measures prior to work commencing. This standard provides an essential layer of protection for items during permitted repair works.</p> <p>HNZPT supports the inclusion of activity specific standard g) requiring the provision of a photographic record before, during and after completion. This standard will ensure the recording of information for items during permitted repair works.</p>	Retain as proposed.
016	Chapter 9 / 9.3.4 Rules - Historic heritage / 9.3.4.1.1 Permitted activities / P8	Oppose	<p>HNZPT recommends the proposed activity P8 be amended to a restricted discretionary activity, with Council's discretion limited to the effects on the heritage item or its setting.</p> <p>We consider that the buildings, structures or features in a heritage setting have the potential to contribute to the heritage values of the item, and their alteration through being a permitted activity could have adverse effects on the item.</p> <p>In lieu of all important elements of a setting being clearly identified in the Statement of Significance, which they currently are not, then P8 has the potential to allow inappropriate alterations.</p>	<p>Amend HNZPT requests the removal of P8.</p> <p>HNZPT requests a new restricted discretionary activity:</p> <p><u>a. Alteration, relocation or demolition of a building, structure or feature in a heritage setting, where the building, structure or feature is not individually scheduled as a heritage item.</u></p> <p><u>b. This rule does not apply to works subject to rules 9.3.4.1.3 RD1 and RD2.</u></p>

				<u>The Council's discretion shall be limited to the following matters:</u> <u>9.3.6.1 Heritage items and heritage settings</u>
017	Chapter 9 / 9.3.4 Rules - Historic heritage / 9.3.4.1.1 Permitted activities / P12	Support	HNZPT supports the demolition or relocation of neutral or intrusive buildings as a permitted activity, providing flexibility within the Residential Heritage Areas whilst ensuring protection of the more significant buildings.	Retain as proposed.
018	Chapter 9 / 9.3.4 Rules - Historic heritage / 9.3.4.1.2 Controlled activities	Support	HNZPT supports the removal of all controlled activities, with the exception of works to Christ Church Cathedral and the Citizens War Memorial.	Retain as proposed.
019	Chapter 9 / 9.3.4 Rules - Historic heritage / 9.3.4.1.3 Restricted discretionary activities / RD6	Support	HNZPT supports the added protection of the character of Residential Heritage Areas by identifying alterations as restricted discretionary activities under RD6. This will allow for greater consideration of the potential effects of proposed alterations.	Retain as proposed.
020	Chapter 9 / 9.3.4 Rules - Historic heritage / 9.3.4.1.3 Restricted discretionary activities / RD7	Support	HNZPT supports the demolition or relocation of defining or contributory buildings as a restricted discretionary activity, providing scope for consideration of the potential effects of the proposal whilst enabling flexibility for neutral or intrusive buildings.	Retain as proposed.
021	Chapter 9 / 9.3.4 Rules - Historic heritage / 9.3.4.1.3 Restricted discretionary activities / RD8	Support	HNZPT supports RD8 which identifies buildings of more than 5m in high density zones adjacent Residential Heritage Areas as a restricted discretionary activity.	Retain as proposed.

			This allows for greater consideration of the potential effects of neighbouring development.	
022	Chapter 9 / 9.3.4 Rules - Historic heritage / 9.3.6 Rules – Matters of discretion / 9.3.6.4 Residential Heritage Areas - new buildings, fences and walls, and exterior alterations to buildings	Support	HNZPT supports the consultation required in 9.3.6.4 d) and e).	Retain as proposed.
023	Chapter 9 / 9.3.4 Rules - Historic heritage / 9.3.6 Rules – Matters of discretion / demolition or relocation of a defining building or contributory building	Support	HNZPT supports the comprehensive matters of discretion contained in 9.3.6.5 relating to the removal of a defining or contributory building within a Residential Heritage Area.	Retain as proposed.
024	Chapter 9 / 9.3.4 Rules - Historic heritage / 9.3.7 Appendices / Appendix 9.3.7.2 Schedule of Significant Historic Heritage Items	Support	<p>HNZPT supports the scheduling of 44 additional heritage items and 26 additional interiors for protection under the District Plan. We understand that this forms part of an ongoing programme to identify new heritage places and to assess additional building interiors.</p> <p>HNZPT also supports the simplified method of protecting interiors, providing clarity on which interiors are protected and which are not.</p>	Retain as proposed.
025	Chapter 9 / 9.3.4 Rules - Historic heritage / 9.3.7 Appendices / Appendix 9.3.7.2 Schedule of Significant Historic Heritage Items	Oppose	We note one of the column headings on the schedule reads 'Heritage NZ Pouhere Taonga Heritage List number & registration type'. We recommend the word 'registration' be removed as this term is no longer used.	<p>Amend</p> <p>HNZPT requests the column heading be amended:</p> <p>Heritage NZ Pouhere Taonga Heritage List number & registration type</p>

026	Chapter 9 / 9.3.4 Rules - Historic heritage / 9.3.7 Appendices / Appendix 9.3.7.2 Schedule of Significant Historic Heritage Items / Heritage Item Number 1401	Oppose	The Schedule entry for Heritage Item No. 1401, Commercial Building and Setting, Former Public Trust Office, omits the HNZPT list number and category.	Amend HNZPT requests the list number and category be added to Heritage Item 1401: Heritage NZ Pouhere Taonga Heritage List number & type <u>3128</u> <u>Category 2</u>
027	Chapter 9 / 9.3.4 Rules - Historic heritage / 9.3.7 Appendices / Appendix 9.3.7.2 Schedule of Significant Historic Heritage Items / Setting Map 629	Oppose	Identification of Heritage Item No. 107, Citizens' War Memorial and Setting on Setting Map 629 shows the item in its previous location. This should be amended to show the current location.	Amend HNZPT requests Setting Map 629 be amended to show the current location of Heritage Item 107.
028	Chapter 9 / 9.3.4 Rules - Historic heritage / 9.3.7 Appendices / Appendix 9.3.7.3 Schedule of Significant Historic Heritage Areas	Support	HNZPT supports the proposed inclusion of 11 Residential Heritage Areas, which are made up of multiple buildings and features that are collectively, rather than individually, of significance to the district's heritage and character. HNZPT considers this will provide an important new layer of protection for these neighbourhoods with heritage values.	Retain as proposed.
029	Chapter 14 Residential / 14.5 Rules – Medium Density Residential Zone / 14.5.3.1.3 Area-specific restricted discretionary activities / RD15	Support	HNZPT supports the inclusion of activities that do not meet one or more of the built form standards for Residential Heritage Areas in Rule 14.5.3.2. as restricted discretionary activities. This will allow for a greater level of assessment and consideration of the potential effects of the built form standards.	Retain as proposed.

030	Chapter 15 Commercial / 15.11 Rules - City Centre Zone / 15.11.1.3 Restricted discretionary activities / RD11	Support	HNZPT supports the inclusion of activities that do not meet Rule 15.11.2.11(a)(ii), (iii), and (vi) in respect to all buildings on New Regent Street, the Arts Centre, and in the Central City Heritage Qualifying Matter and Precinct, as restricted discretionary activities. This will allow for a greater level of assessment and consideration of the potential effects of the built form standards.	Retain as proposed.
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APPENDIX 2 - SUBMISSION OF HERITAGE NEW ZEALAND POUHERE TAONGA ON PLAN CHANGE 14 OF THE CHRISTCHURCH DISTRICT PLAN

HNZPT Ref #	Provision to which submission relates	Support or Oppose	Reasons for submission	Decision sought from Council (Retain / Amend / Delete)
001	Chapter 6 / General Rules and Procedures / 6.1A Qualifying Matters	Support	HNZPT supports the inclusion of all existing heritage items, settings, and features protected under the District Plan, as a Qualifying Matter. This status allows Council to apply building height or density requirements enabling less development than would otherwise be required to be enabled, therefore affording greater protection of Christchurch's significant heritage.	Retain as proposed.

Details of submitter No: 1048 - Cameron Matthews

Submitter:	Cameron Matthews
Submitter Address:	[REDACTED]

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 04/05/2023

First name: Cameron

Last name: Matthews

Postal address:

Email:

Daytime Phone:

Would you like to present your submission in person at a hearing?

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Consultation Document Submissions

Provision: Chapter 2 Abbreviations and Definitions

Seek Amendment

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

Remove all Residential Heritage Areas from the plan.

Strike out all rules or parts of rules as they relate to RHA's and Heritage Areas, including (but not limited to):

- Contributory and Defining Buildings
- Relocation

My submission is that:

I oppose the proposed Residential Heritage Areas. I think they shouldn't be Qualifying Matters and should all be removed from the plan.

Provision: Chapter 8 Subdivision, Development and Earthworks

Seek Amendment

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

Remove all Residential Heritage Areas from the plan.

Strike out all rules or parts of rules as they relate to RHA's and Heritage Areas, including (but not limited to):

- 8.6.1

My submission is that:

I oppose the proposed Residential Heritage Areas. I think they shouldn't be Qualifying Matters and should all be removed from the plan.

Provision: Chapter 6 General Rules and Procedures

Seek Amendment

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

Remove all Residential Heritage Areas from the plan.

Strike out all rules or parts of rules as they relate to RHA's and Heritage Areas, including (but not limited to):

- 6.8.5.1(a)(iv)

My submission is that:

I oppose the proposed Residential Heritage Areas. I think they shouldn't be Qualifying Matters and should all be removed from the plan.

Provision: Chapter 9 Natural and Cultural Heritage

Seek Amendment

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

Remove all Residential Heritage Areas from the plan.

Strike out all rules or parts of rules as they relate to RHA's and Heritage Areas, including (but not limited to):

- 9.3.2.2.2
- 9.3.4.1

My submission is that:

I oppose the proposed Residential Heritage Areas. I think they shouldn't be Qualifying Matters and should all be removed from the plan.

Provision: Chapter 14 Residential

Seek Amendment

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

Remove all Residential Heritage Areas from the plan.

Strike out all rules or parts of rules as they relate to RHA's and Heritage Areas, including (but not limited to):

- 14.5.3.1.3
- 14.5.3.2
- 14.6.1.3 Advice Note: 1, and any other provision enacting a low-density buffer-zone between HRZ and RH zones.

My submission is that:

I oppose the proposed Residential Heritage Areas. I think they shouldn't be Qualifying Matters and should all be removed from the plan.

Provision: Planning Maps**Seek Amendment****I seek the following decision from the Council*****If seeking to make changes to a specific site or sites, please provide the address or identify the area:***

Remove all Residential Heritage Areas from the plan, particularly:

- Lyttelton
- Piko/Shand
- Inner City West

My submission is that:

I oppose the proposed Residential Heritage Areas. I think they shouldn't be Qualifying Matters and should all be removed from the plan. In particular I oppose the following proposed Residential Heritage Areas:

- Lyttelton - Heritage restrictions cover most of the town, andnbsp;enforcing arbitrary design standards and density restrictions on an otherwise organic urban character, appreciated for its authenticity to the diverse makeup people living there and the interesting juxtaposition of natural landscapes, active heavy industry, artistic expression, and good hospitality venues. The proposed restriction will limit Lyttelton's authentic, vibrant character by constraining the aesthetics of built structures to some fixed period, which will develop inauthentically to the needs and preferences of the current and future residents, while worsening housing affordability - exacerbating gentrification.
- Piko/Shand - Heritage restrictions here would retain low-density ex-state-houses in favour of high-quality, high density homes abutting the proposed mass-rapid-transit line linking Hornby and Riccarton commercial centres to the City Centre and beyond. This is also proximal to the University of Canterbury. This is an area perfectly suited to more homes.
- Inner City West - Heritage restrictions here would apply to many buildings of low quality, low significance, and in an extremely central and desirable location, walkable to the City Centre, Botanic Gardens, Arts Centre, City Council building, etc. The relevant heritage structures nearby are already protected by individual designations. This is an ideal place for more new structures, not less.

Details of submitter No: 1050 - Defyd Williams

Submitter:	Defyd Williams
Submitter Address:	
Organisation:	Papanui Heritage Group
Behalf of:	Papanui Heritage Group

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 05/05/2023

First name: Defyd

Last name: Williams

Organisation: Papanui Heritage Group

On behalf of: Papanui Heritage Group

Postal address:

Email:

Daytime Phone:

Would you like to present your submission in person at a hearing?

Yes

Additional requirements for hearing:

Consultation Document Submissions

Provision: Chapter 1 Introduction

Seek Amendment

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

he change we are seeking is to have the Memorial Avenues (St James Avenue, Dormer, Perry and Gambia Streets) removed from the High Density Residential Zone (HRZ). In addition we ask that part of three memorial avenues (Halton Street, Tomes Road, and one side of Windermere Road) plus some other streets adjoining the memorial avenues, also be removed from the HRZ zone.



My submission is that:

See the attachment for the full submission.

Our submission is regarding Proposed Plan Change 13 – Heritage: the addition of Papanui's 16 Memorial Avenues as Heritage Items, (Heritage Item 1459) as shown on Planning Map 24.

The Papanui Heritage Group **supports** the addition of the sixteen (we believe fifteen Papanui Memorial Avenues, plus Tillman Avenue), to the District Plan's Schedule of Significant Historic Heritage for protection. We understand the addition of the memorial trees to the schedule is also a Qualifying Matter under Plan Change 14 and we have prepared a separate submission on PC 14.

Attached Documents

Name
Defyd Williams-PHG submission PC 13 Heritage 
Defyd Williams Email 

Cui, Aviva

From: [REDACTED]
Sent: Thursday, 4 May 2023 5:14 pm
To: Engagement
Subject: Papanui Heritage Group submissions for PC13 and PC 14
Attachments: 2 PHG submission PC 13 Heritage.docx; PHG submission PC 13 Heritage.docx

Dear Swantje

submissions on PC13 and PC14 are attached? I would like to speak to the two submissions. Please acknowledge that you have sufficient details.

Mā te Wā

Defyd Williams
Papanui Heritage Group

[REDACTED]

Details of submitter No: 1051 - Sarah Smith

Submitter:	Sarah Smith
Submitter Address:	[REDACTED]

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 08/05/2023

First name: Sarah

Last name: Smith

Postal address:

Email:

Daytime Phone:

Would you like to present your submission in person at a hearing?

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Consultation Document Submissions

Provision: Chapter 9 Natural and Cultural Heritage

Support

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

380 Pettigrews Rd, Pigeon Bay, Akaroa, which is the old Kikupa School and site

My submission is that:

I wish the historic Kukupa school and surrounding area to be preserved and not developed, except for the existing single school building as it stands to be restored for either heritage value or use as is, but no change of use to accommodation.

Provision: Chapter 10 Designations and Heritage Orders

Support

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

380 Pettigrews Road, Pigeon Bay, which is the old Kukupa School building

My submission is that:

I would like to see Kukupa School protected and restored and the surrounding gardens and school grounds tidied up.

Details of submitter No: 1052 - Bradley Nicolson

Submitter:	Bradley Nicolson
Submitter Address:	
Organisation:	Oxford Terrace Baptist Church
Behalf of:	Oxford Terrace Baptist Church

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 10/05/2023

First name: Bradley

Last name: Nicolson

Organisation: Oxford Terrace Baptist Church

On behalf of: Oxford Terrace Baptist Church

Postal address:

Email:

Daytime Phone:

Would you like to present your submission in person at a hearing?

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Consultation Document Submissions

Provision: Chapter 9 Natural and Cultural Heritage

Seek Amendment

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

1- Clarify whether Medium or High Density Zone is applicable to 288 Oxford Terrace site and all associated lots.

2- That Chester Street East from Madras Street to Fitzgerald Avenue is included in the proposed Residential Heritage Area.

3- As the sentence stands at the moment, it reads that a High Density Zone would be the buffer. As this does not make any sense, we suspect that the wording needs clarification.

That the Plan Change 13 defines a buffer for RHA's, and how a buffer would be given effect.

4- To publicly notify a resource consent for any development on 94-96 Chester Street East.

My submission is that:

Submission from the Oxford Terrace Baptist Church to the Christchurch City Council's Proposed Plan Change 13

1 Reference the interactive map for 288 Oxford Terrace

The Oxford Terrace Baptist Church owns this site. The Consultation document advises to use this map to see what is proposed for each site. See <https://christchurchcity.maps.arcgis.com/apps/webappviewer/index.html?id=ad65227f17a8492aa9191f4c665a3d0a>

Our submission is: The map appears to have two different density zones on this site, namely a High Density Zone and a Medium Density Zone.

We seek the following decision from Council: Clarify whether Medium or High Density Zone is applicable to this site.

2 Chester Street East/Dawson Street Residential Heritage Area

The relevant document is [4Residential-heritage-areas-aerial-maps \(pdf\)](#).

Our submission is: The proposed delineation of the Chester Street East/Dawson Street Residential Heritage Area (RHA) does not include the entirety of Chester Street East. The reasons for excluding the remainder of Chester Street East are not given in the Consultation document, so it is difficult to ascertain why the street would be thus divided.

We seek the following decision from Council: That Chester Street East from Madras Street to Fitzgerald Avenue is included in the proposed Residential Heritage Area.

3 Introduction of a buffer for Residential Heritage Areas

Reference is the document [WEB-STR 5432-Housing-and-Business-Choice-and -Heritage-Consultation-](#) document on page 24. To quote "Our proposal also includes introducing a buffer for RHAs, with a High Density border to better protect their edges."

Our submission is: This statement is very confusing, needs clarifying and explaining to assist in understanding exactly how a buffer would be given effect between an RHA and the surrounding zoning.

We seek the following decision from Council: As the sentence stands at the moment, it reads that a High Density Zone would be the buffer. As this does not make any sense, we suspect that the wording needs clarification. That the Plan Change 13 defines a buffer for RHA's, and how a buffer would be given effect.

4 Properties of interest to Oxford Terrace Baptist Church

The property at 94-96 Chester Street East has been derelict since the earthquakes as the previous houses were demolished. This site is adjacent to 98-100 Chester Street East which is owned by the Oxford Terrace Baptist Church, and which is proposed to be added to the Register of Historic buildings. Four significant heritage buildings are near this site.

Our submission is: The possible development of this site, if not done sympathetically and in character with 98-100 Chester Street East and the four other heritage buildings, will have a significant detrimental effect on the collective heritage and amenity values of this part of Chester Street East.

We seek the following decision from Council: To publicly notify a resource consent for any development on 94-96 Chester Street East.

Details of submitter No: 1059 - Ainsley McLeod

Submitter:	Ainsley McLeod
Submitter Address:	
Organisation:	The Canterbury Jockey Club
Behalf of:	The Canterbury Jockey Club

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 12/05/2023

First name: Ainsley

Last name: McLeod

Organisation:

Postal address:

Email:

Daytime Phone:

Would you like to present your submission in person at a hearing?

Yes

Additional requirements for hearing:

Due to the specific interests of the Canterbury Jockey Club, and particularly the heritage significance of the Riccarton Racecourse, the Canterbury Jockey Club will not consider presenting a joint case.

Consultation Document Submissions

Provision: Chapter 9 Natural and Cultural Heritage

Seek Amendment

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

My submission is that:

Detailed submission in the attachment.

1. Retain the deletion of Heritage Item 453 from Appendix 9.3.7.2 Schedule of Significant Historic Heritage Items as notified.

2. Retain the updated Statement of Significance ' Christchurch District Plan- Scheduled Heritage Place Heritage Assessment- Statement of significant Heritage Item Number 452 Riccarton Racecourse Tea House and Setting- 165 Racecourse Road, Christchurch' as notified (or revise to better reflect the content of this submission).

Provision: Planning Maps

Seek Amendment

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

My submission is that:

3. Retain the deletion of Heritage Setting 183 from the Heritage Items and Settings Aerial Maps and Natural and Cultural Heritage Planning Map 30C as notified.
4. Amend Heritage Setting 684 as shown on the Heritage Items and Settings Aerial Maps and Natural and Cultural Heritage Planning Map 30C as shown in Figure 1 (attached).
5. Such further, alternative or consequential relief as may be necessary to fully give effect to this submission.

Attached Documents

Name
Canterbury Jockey Club Submission on Proposed Plan Change 13 (final)

Form 5

Submission on notified proposal for policy statement or plan, change or variation

Clause 6 of Schedule 1, Resource Management Act 1991

To the Christchurch City Council ("the Council")

Name of submitter: Canterbury Jockey Club

This is a submission on a change proposed to the following plan ("the proposal"):

Proposed Heritage Plan Change ("proposed Plan Change 13") to the operative Christchurch District Plan ("District Plan").

The Canterbury Jockey Club could not gain an advantage in trade competition through this submission.

The specific provisions of the proposal that my submission relates to are:

- Appendix 9.3.7.2 Schedule of Significant Historic Heritage Items;
- updated Statement of Significance 'Christchurch District Plan – Scheduled Heritage Place Heritage Assessment – Statement of Significance Heritage Item Number 452 Riccarton Racecourse Tea House and Setting – 165 Racecourse Road, Christchurch';
- proposed Heritage Items and Settings Aerial Maps (Heritage Setting Number 684); and
- Natural and Cultural Heritage Planning Map 30C.

The Canterbury Jockey Club's submission is:

Background: The Riccarton Park Racecourse and Canterbury Jockey Club

The Canterbury Jockey Club was established in 1854 and held its first meeting in Hagley Park at Easter of the following year. By January 1857 the club was holding its third meeting at its new course, the current site, in Upper Riccarton. The Riccarton Park Racecourse has been used continuously for racing since this time. The Canterbury Jockey Club has had the oldest continuous existence of any horse racing club in the country.

The racecourse at Upper Riccarton was reserved as a public recreation ground by the Canterbury Provincial Council in 1858 and thereafter leased to the Jockey Club. Riccarton Park Racecourse became the home of the New Zealand Cup in 1867 and the course's Cup and Show Week each November is one of Canterbury's premier events.

The Riccarton Park Racecourse is held and administered under the Riccarton Racecourse Act 2016 by the Trustees of the Christchurch Racecourse whose power and authorities in respect of the site are set out in that legislation.

The Canterbury Jockey Club is responsible for the day-to-day development, operation and maintenance of the facilities at Riccarton Park Racecourse, including race days, events and the leasing and management of training facilities.

Apart from the racecourse itself, a number of buildings and spaces, have developed within the racecourse site over time, including the public grandstand, tea house, members stand, storage

sheds, stables/tie-ups and established gardens and significant trees. The Riccarton market is also established on the site.

The District Plan includes the following in the Appendix 9.3.7.2 Schedule of Significant Historic Heritage Items:

- Riccarton Racecourse Tea House and Setting (Heritage Item Number 452 and Heritage Setting Number 183); and
- Riccarton Racecourse Public Grandstand and Setting (Heritage Item Number 453 and Heritage Setting Number 183).

The tea house is also registered under the Heritage New Zealand Pouhere Taonga Act 2014 (“HNZPT”) as a Category 2 Historic Place (List Number 5330).

In October 2022, the Council granted resource consent to demolish the Grand National Stand at Riccarton Racecourse. The demolition of the grandstand has now commenced.

Proposed Plan Change 13 responds to the demolition of the grandstand by:

- deleting Heritage Item 453 from Appendix 9.3.7.2 Schedule of Significant Historic Heritage Items;
- reducing the area subject to a heritage setting notation by replacing Heritage Setting Number 183 with a new Heritage Setting number 684 (shown on the Proposed Heritage Items and Settings Aerial Maps);
- updating the Statement of Significance ‘Christchurch District Plan – Scheduled Heritage Place Heritage Assessment – Statement of Significance Heritage Item Number 452 Riccarton Racecourse Tea House and Setting – 165 Racecourse Road, Christchurch’; and
- revising Natural and Cultural Heritage Planning Map 30C to reflect the area subject to Heritage Setting number 684.

Statutory Context

The Section 32 Evaluation that accompanies proposed Plan Change 13 describes Council’s legal obligations and the related statutory and strategic planning documents. This includes Council’s obligations directed by section 6, 7, 31, 74 and 75 of the RMA and the provisions of the Canterbury Regional Policy Statement (“CRPS”); the objectives and policies of the District Plan; and the Council’s ‘Our Heritage, Our Taonga Heritage Strategy (2019 – 2029)’. Canterbury Jockey Club’s submission is made with cognisance of this statutory context.

Canterbury Jockey Club’s submission

Canterbury Jockey Club recognises that, amongst other matters, proposed Plan Change 13 seeks to delete the ‘Riccarton Racecourse Public Grandstand and Setting’ listing as a Significant Historic Heritage Item in Appendix 9.3.7.2 and, consequently, revise the ‘Riccarton Racecourse Tea House and Setting’ listing in the District Plan.

Given the demolition of the public grandstand, Canterbury Jockey Club supports the deletion of the listing of this building in Appendix 9.3.7.2 and seeks that the deletion be retained as notified. Canterbury Jockey Club similarly generally supports the revision of the ‘Statement of Significance’ so

that this statement relates to the tea house and its setting and not the setting of the public grandstand.

Further, Canterbury Jockey Club supports the retention of the HNZPT listed tea house as a scheduled heritage item in the District Plan.

In respect of proposed Heritage Setting 684, Canterbury Jockey Club supports the proposed reduction in the area subject to a Heritage Setting notation, when compared to the current Heritage Setting 183. However, Canterbury Jockey Club does not support the extent of proposed Heritage Setting 684 that is shown on the Proposed Heritage Items and Settings Aerial Maps and Natural and Cultural Heritage Planning Map 30C.

Canterbury Jockey Club seeks that the area subject to the Heritage Setting 684 notation is further reduced to more accurately reflect the area that provides the context and setting for the tea house by including the landscaped area and moat in the 'setting', which are intrinsic to the Tea Rooms building and its historical context, but to exclude areas that have no heritage relationship to the tea rooms building and surrounds.

Figure 1 illustrates the area that Canterbury Jockey Club supports being included in Heritage Setting 684.

Figure 1: Revised Area of Heritage Setting 684 (shown in red)



The area that Canterbury Jockey Club seeks is excluded from the Heritage Setting does not reflect the historical context of the tea house and garden area. These areas are not mentioned in the

Statement of Significance and have no functional, visual, contextual or heritage connection to the tea house building and surrounds. For instance, the strip of trees to the south of the site that is included within the proposed Heritage Setting is:

- is an area used for horse truck parking during racedays;
- is visually separated by horse stabling and tie-up buildings; and
- is physically separated from the tea house and the tea house, and other parts of the site, are not accessed through this area.

In this regard, it is acknowledged that notable trees on the site are protected in accordance with Appendix 9.4.7.1 and Chapter 9.4 of the District Plan and, as such, the Heritage Setting is not necessary to achieve the protection of these trees. It is considered that the protection of these trees under Chapter 9.4 of the District Plan would be satisfactory and appropriate and further proposed provisions within Chapter 9.3 of the District Plan would be onerous and unnecessary.

Other elements of the racecourse that are proposed to be included in revised Heritage Setting 684 include pedestrian pathways, parking areas, structures associated with the Riccarton market and vehicle accessways. These spaces and access areas are not considered to reflect the historical context of the tea house building and setting. This has been accepted in the context of a recent resource consent that was granted for a storage shed within the existing Heritage Setting (RMA/2022/3300) where the decision stated:

“The shed is 84m south west of the Tea House at its closest point. There is considerable mature vegetation around the Tea House and between the two structures, including a number of scheduled trees. The applicant considers that the shed will not be visible from the Tea House because of the vegetation, and additionally that its recessive colour will make it less conspicuous within the setting. Noting that many of these trees are deciduous and therefore that their capacity to screen the shed from the Tea House will be less during winter, I otherwise agree with this assessment. No assessment of the impact of the shed on the Grandstand has been provided. In view of the impending demolition, this is acceptable. ...

Given the distance of the shed from the Tea House and the lack of visibility between the two buildings, I recommend that the effects of the proposed new building on the heritage values of the Riccarton Racecourse Tea House and its setting is less than minor.”

Acknowledging this conclusion, Canterbury Jockey Club’s submission seeks that the mature vegetation is the natural boundary for the heritage setting. This vegetation is shown on the following photographs 1 to 6.

Canterbury Jockey Club welcomes the opportunity to meet with Council representatives on-site to further consider the appropriate location for the Heritage Setting boundary at any time that is convenient.



Photo 1: View looking north to the Tea House



Photo 2: View of rear of Tea House building looking west



Photo 3: The Tea House entrance



Photo 4: The Tea House view from front lawn



Photo 5: The Tea House view from front lawn



Photo 6: The Tea House view from front lawn

It is Canterbury Jockey Clubs conclusion that reducing the area of Heritage Setting 684 as sought is the most efficient, effective and appropriate means to give effect to the relevant statutory provisions and, as such, achieve the purpose of the RMA.

The Canterbury Jockey Club seeks the following decision from the local authority:

1. retain the deletion of Heritage Item 453 from Appendix 9.3.7.2 Schedule of Significant Historic Heritage Items as notified;
2. retain the updated Statement of Significance 'Christchurch District Plan – Scheduled Heritage Place Heritage Assessment – Statement of Significance Heritage Item Number 452 Riccarton Racecourse Tea House and Setting – 165 Racecourse Road, Christchurch' as notified (or revise to better reflect the content of this submission);
3. retain the deletion of Heritage Setting 183 from the Heritage Items and Settings Aerial Maps and Natural and Cultural Heritage Planning Map 30C as notified;
4. amend Heritage Setting 684 as shown on the Heritage Items and Settings Aerial Maps and Natural and Cultural Heritage Planning Map 30C as shown in Figure 1.
5. Such further, alternative or consequential relief as may be necessary to fully give effect to this submission.

The Canterbury Jockey Club wishes to be heard in support of its submission.

Due to the specific interests of the Canterbury Jockey Club, and particularly the heritage significance of the Riccarton Racecourse, the Canterbury Jockey Club will not consider presenting a joint case.



**Signature of person authorised to sign
on behalf of the Canterbury Jockey Club**

Date: 12 May 2023

Electronic address for service:

Telephone:

Postal address:

Contact person: Ainsley McLeod

**SUBMISSION ON A NOTIFIED PROPOSAL FOR A POLICY STATEMENT OR PLAN, CHANGE OR
VARIATION**


**CLAUSE 6 OF SCHEDULE 1 AND VIA INTENSIFICATION PLANNING INSTRUMENT (IPI) IN
ACCORDANCE WITH SECTION 80F(1)(a), RESOURCE MANAGEMENT ACT 1991**

Submission on Plan Changes 13 and 14 to the Christchurch District Plan (PC13 and PC14)

To: Christchurch City Council
53 Hereford Street
Christchurch Central
Christchurch 8013
<https://ccc.govt.nz/the-council/haveyoursay/show/531>

Submitter: Christ's College Canterbury (**Christ's College**)

Contact: Rob McFarlane

Address for Service: 

Attn: Catherine Boulton



Hearing

Christ's College wishes to be heard in support of this submission.

Introduction

1. This is a submission on the Christchurch District Council (the Council's) Proposed Plan Change 13 and 14 (PC13 and PC14) to the Christchurch District Plan. It is noted that there is ambiguity between the notified Plan Changes (with some changes notified under both Plan Change 13 and 14). Therefore, Christ's request that all raised submission points are considered across both Plan Changes.
2. Christ's College could not gain an advantage in trade competition through this submission.

3. Christ's College is generally supportive of Plan Change 13 in respect of the identification and management of historic heritage and the use of qualifying matters for individually listed heritage items – noting that historic heritage is a matter of national significance in Section 6.
4. However, Christ's College oppose the Residential Heritage Area Qualifying Matter being applied to their land on the eastern side of Rolleston Avenue. This is land that falls outside of the College's main campus.
5. Christ's College also oppose the zoning of 21 Gloucester Street as Medium Density Residential Zone and seek that this is rezoned as Specific Purpose (Schools) Zone to match the zoning of the rest of their adjoining land.

Background

6. Christ's College is the only independent boarding and day school for boys in the South Island. The school was established as part of the original Anglican foundation of Christchurch. It first opened at the start of 1851 in the Lyttelton Immigration Barracks before moving to the St Michael's parsonage in Oxford Terrace and then on to its present site at the main campus in 185+6. The school's location (next to Hagley Park) provided the college with room to expand and the school gradually began to acquire additional buildings so that now the school and its associated buildings are located on either side of Rolleston Avenue. The main school campus on the western side of Rolleston Avenue is unique with its combination of heritage listed items and their settings alongside state of the art modern learning spaces, sports building and fields, arts facilities and houses for boarders and dayboys. This land falls within the Specific Purpose (School) Zone under the Operative District Plan.



Figure 1: Aerial Image of Christ's College Land (Identified in Red) to the West of Rolleston Avenue (Source: Canterbury Maps)

7. Christ's College also owns land to the east of Rolleston Avenue, located on the block between Armagh Street to the north and Gloucester Street to the South, and on the south-western side of Gloucester Street. This land is currently occupied by houses for dayboys and boarders and other buildings associated with the educational, administrative and boarding functions of the school. There are two heritage listed items within this block, Rolleston House at 2 Gloucester Street which has a Historic Place Category 2 listing and is used as a Christ's College dayboy house. The other is the dwelling at 64 Rolleston Avenue, this is listed as being 'Significant' in the Christchurch District Plan but not on the Heritage New Zealand List, this building is used by the school for administrative purposes. This land is predominantly zoned Specific Purpose (School) Zone except for 21 Gloucester Street which was acquired by College in February 2019 for strategic purposes to align and straighten the land owned in this block and is zoned Residential Central City Zone under the Operative District Plan and Medium Density Residential Zone under Plan Changes 13 and 14. It is across this block of Christ's College land on the eastern side of Rolleston Avenue where future development to accommodate improved facilities and future roll growth at the school is likely to be directed given the significant development constraints at the main campus caused through the combination of heritage buildings/ settings and waterway setbacks.
8. On this land to the east of Rolleston Avenue, Christ's College have obtained a Certificate of Compliance (RMA/2022/3077) for the demolition of the existing buildings on the site to ground level (excluding the heritage listed building at 2 and 64 Rolleston Ave). This certificate of compliance lapses on 6 October 2027. This certificate of compliance was for:
 - Armagh Street – Numbers 6, 14, 16, 20 and 22
 - Gloucester Street – Numbers 4, 6, 8, 13, 14 and 19
 - Rolleston Avenue – Numbers 54, 64 and 72 (excluding the Heritage Items and Setting 267 at 64 Rolleston Ave).



*Figure 2: Aerial Image of Christ's College and Crown Owned Land (Identified in Red) to the East of Rolleston Avenue
(Source: Canterbury Maps)*

Plan Change 13 – Heritage Plan Change

Christ's College opposes the following:

- Christ's College **opposes** the addition of the 'Proposed Residential Heritage Area' Qualifying Matter Overlay (HA6) to their land on the Central City Planning Map.
- Christ's College **opposes** the proposed addition of the 'Proposed Residential Heritage Area' Qualifying Matter Overlay (HA6) to the Planning Map Enlargement H1 referred to on the Central City Planning Map. Note that this Planning Map Enlargement is not included in the bundle of maps notified.
- Christ's College **opposes** the proposed amendments to 9.3.2.2.8 Policy – Demolition of heritage items as these changes subject buildings in heritage areas to the same policy tests as listed items.

Plan Change 14 – Proposed Housing and Business Choice Plan Change

Christ's College opposes and supports the following:

- Christ's College **opposes** the zoning of their land at 21 Gloucester Street as Medium Density Residential Zone on the Central City Zoning, Other Notations, Designations and Heritage

Orders Planning Map. Christ's College **supports** the zoning of their land at 21 Gloucester Street as Specific Purpose (Schools) Zone with the alternate zoning of High Density Residential Zone.

- Christ's College **supports** the alternate zoning of their land which falls within the Specific Purpose (Schools) Zone on the eastern side of Rolleston Avenue as High Density Residential Zone as set out in Sub-chapter 13.6 SP School Appendix 13.6.6.3.
- As above, Christ's College **opposes** the proposed amendments to 9.3.2.2.8 Policy – Demolition of heritage items as these changes subject buildings in heritage areas to the same policy tests as listed items.

Reasons for Christ's College opposition:

The College is very aware of their responsibility as stewards for the extensive collection of significant heritage buildings located across the main campus west of Rolleston Avenue. Since the earthquakes the College has invested tens of millions of dollars in the sensitive repair and strengthening of a number of these buildings to ensure their ongoing ability to deliver functional educational spaces.

In addition to being stewards of their built heritage, the College is also very aware of their responsibility to provide modern, functional learning spaces that reflect modern teaching requirements and that provide warm, safe residential accommodation for boarders. Because of the heavily constrained nature of the main campus through heritage and waterway setback rules, the primary area for future expansion and provision of modern educational spaces lies on the eastern side of Rolleston Avenue. With the exception of 21 Gloucester Street, all of the College's landholdings have a Specific Purpose (Schools) zoning, commensurate with the use of this land for educational purposes. The ability to maintain the Historic Campus west of Rolleston Avenue is inextricably linked to the strategic landholding on the eastern side of Rolleston Avenue for school related functions.

The imposition of the proposed Heritage Conservation Area, and the associated ambiguity in the alternative zoning and associated built form standards, runs directly counter to the ability of this land to deliver a functional educational environment. School buildings have a different function and form to cottages and small dwellings, with their built form inevitably reflecting their internal function. As such it is simply not plausible for large educational buildings to be designed in a manner that is comparable to a series of small detached Victorian dwellings. The eastern block is located within the city centre of the largest city in the South Island. As such larger buildings are entirely appropriate within the wider context of the College's CDB location.

Since recovering from the earthquake sequence, the College has experienced consistent roll growth such that the school currently has a roll of some 710 students with a strategy to grow to approximately

750 students over the coming years. Christ's College therefore opposes further planning constraints which will inhibit their development and growth for education activities across this land.

The College's landholdings on the eastern side of Rolleston Avenue are comprised of an eclectic mix of building ages and designs. The majority of the structures are post-1940s and/or are vacant sites and therefore the heritage values of the College's landholdings are a) limited, and b) interspersed with numerous more modern buildings or vacant lots such that there is little cohesion or uniformity on building age.

Christ's College opposes the inclusion of their land within the 'Proposed Residential Heritage Area' (HA6) as identified on the Central City Planning Map notified under PC13 and the Planning Map Enlargement H1 (which was not notified). Christ's College's land is not zoned as a '*residential area*', rather, their land across both sides of Rolleston Avenue is predominantly zoned Specific Purpose (School) Zone. School Zones appropriately apply to the vast majority of public, state-integrated, and private schools throughout the district. The zone seeks to enable education providers to efficiently use and develop their land and buildings for education activities (which include land and/or buildings for regular instruction or training but also offices and boarding and residential accommodation). The land on the eastern side of Rolleston Avenue is currently and appropriately being used for 'education' purposes with the land and buildings being used for school administration, dayboy houses and boarders accommodation and staff/housemasters accommodation. Having a Residential Heritage Area overlay over Christ's College land is therefore misaligned with the underlying zoning of the land and its existing use for education activities.

Christ's College, as mentioned above, hold a Certificate of Compliance for all buildings across their land on the eastern side of Rolleston Avenue (excluding the two listed heritage items). This was sought to retain future flexibility to achieve College's Strategic Objectives. Christ's College can therefore demolish these buildings within the next few years (at any point up until October 2027) without needing to obtain a Resource Consent to do so. The buildings contribution to the heritage fabric, across this land as neutral, defining or contributory will be meaningless if these buildings are demolished.

PC14 introduces amendments to the Specific Purpose (School) Zone provisions under Sub-chapter 13.6 SP School. To start, PC14, at Appendix 13.6.6.3 has identified the 'alternate zone' for Christ's College on the land located at Rolleston Avenue, City and Montreal Street, City (former Girls High site sold by Christ's College in May 2021) as being 'High Density Residential Zone'. Christ's College supports this alternate High Density Residential Zoning. This alternative zoning applies when the land and buildings are no longer required for an education activity and are to be developed for other uses

consistent with the provisions applicable in the surrounding environment. The built form provisions (13.6.4.2) amended under Plan Change 14 also apply to educational activities. There is no reference to the Inner West Residential Heritage Area under Sub-chapter 13.6 SP School or under Sub-chapter 14.6 Rules – High Density Residential Zone, therefore the inclusion of the Heritage Area over this land is seen as being both redundant but also confusing.

Specific provisions relating to the Inner West Residential Heritage Area would apply on Christ's College's site at 21 Gloucester Street, which under PC14 is proposed to be zoned as the Medium Density Residential Zone. Christ's College would support the rezoning of this site to the Specific Purpose (School) Zone, this would square up the school zone with their land and enable the land and buildings to be used for education activities. Christ's College would also support the alternate zoning of this site as being High Density Residential Zone as it is for their adjoining land.

Amendments are introduced, altering the level of development that can be undertaken on these sites. Under PC14 - Sub-chapter 14.5 Rules – Medium Density Residential Zone, Rule 14.5.3.2.3 introduces a maximum height limit of 11m for buildings within the Inner City West Residential Heritage Area. This is the height limit that would apply to 21 Gloucester Street if it were to remain zoned as Medium Density Residential Zone as proposed under the Plan Change. As the remainder of Christ's College land is located within the Specific Purpose (Schools) Zone and its alternative zoning listed under Sub-chapter 13.6 SP School (Appendix 13.6.6.3) is High Density Residential Zone the maximum height limit introduced under PC14 Rule 13.6.4.2.5ii is 14m within 10m of an internal boundary, otherwise it is 32m. Christ's College is supportive of the height limits introduced under PC14 but submit that it is confusing having the heritage overlay (HA6) over Christ's College Specific Purpose (School) zoned land as on first look it would seem as though the height limit were more restrictive than the rules provide for.

Christ's College opposes the notified amendments to 9.3.2.2.8 Policy – Demolition of heritage items as it subjects buildings within a heritage area to the same stringent tests as listed heritage items which have met the significance threshold for scheduling in the District Plan. It is inappropriate that buildings located within a heritage area are subject to the same policy test as listed heritage items. In this regard it is considered that the Policy be revised as follows:

9.3.2.2.8 Policy – Demolition of heritage items

- a. When considering the appropriateness of the demolition of a **heritage item** scheduled in **Appendix 9.3.7.2** ~~defining building or contributory building in a heritage area scheduled in Appendix 9.3.7.3~~, have regard to the following matters:

- i. whether there is a threat to life and/or property for which interim protection measures would not remove that threat;
- ii. whether the extent of the work required to retain and/or **repair** the **heritage item** ~~or building~~ is of such a scale that the heritage values and integrity of the heritage item or building would be significantly compromised, **and the heritage item would no longer meet the criteria for scheduling in Policy 9.3.2.2.1;**
- iii. whether the costs to retain the **heritage item** ~~or building~~ (particularly as a result of damage) would be unreasonable;
- iv. the ability to retain the overall **heritage values** and significance of the **heritage item** ~~or building~~ through a reduced degree of **demolition**; and
- v. the level of significance of the **heritage item**.

Relief Sought

The submitter requests the following amendments and decisions:

Plan Change 13 and 14

1. The Inner West Heritage Residential Area (HA6) Overlay **be deleted** across Christ's College and Crown land to the east of Rolleston Avenue (PC13 and PC14), specifically:
 - 6 Armagh Street – Part Section 361 Town of Christchurch
 - 14 Armagh Street – Lot 2 DP 52794
 - 16 Armagh Street – Lot 1 DP 5524
 - 20 Armagh Street – Section 355 Town of Christchurch
 - 22 Armagh Street – Section 353 Town of Christchurch
 - 2- 8 Gloucester Street - Lot 1 Deposited Plan 36171, Part Lot 21 Deposited Plan 1003 and Part Section 365, Part Section 367 and Part Section 369 Town of Christchurch
 - 7 Gloucester Street – Town Section 360 City of Christchurch
 - 9 Gloucester Street – Lot 1 DP 52794
 - 13 Gloucester Street – Lot 1 DP 4097
 - 14 Gloucester Street – Part Lot 21-22 DP 1003
 - 19 Gloucester Street – Town Section 354 City of Christchurch
 - 64 Rolleston Avenue – Section 362 Town of Christchurch
 - 72 Rolleston Avenue – Section 363 and Part Section 361 Town of Christchurch
2. The alternate zone listed in Appendix 13.6.6.3 for Christ's College **be retained** as High Density Residential zone (PC14).

3. **Amend** the Central City Planning Map to rezone 21 Gloucester Street to Specific Purpose (Schools) Zone (PC13 and 14).
4. **Reject** all notified changes to 9.3.2.2.8 Policy – Demolition of scheduled historic heritage (PC13 and PC14).

Overall Conclusion

Christ's College's ability to maintain their Historic Campus west of Rolleston Avenue is dependent on Christ's College being able to utilise their total landholdings to achieve maximum opportunities and efficiencies. The land on the eastern side of Rolleston Avenue provides the potential to expand and/or enhance educational support and classroom facilities. In relation to the provisions and matters that Christ's College has raised concerns about, it is considered those require deletion, inclusion or amendment because without such, they:

- will not promote sustainable management of resources and will not achieve the purpose of the RMA;
- are contrary to Part 2 and other provisions of the RMA;
- will not enable the social and economic well-being of the community;
- will not meet the reasonably foreseeable needs of future generations;
- will not achieve integrated management of the effects of use, development or protection of land and associated resources of Christchurch City;
- will not enable the efficient use and development of the College's land and will not enable this land to be efficiently redeveloped to meet evolving educational needs; and
- do not represent the most appropriate means of exercising the Council's functions, having regard to the efficiency and effectiveness of the provisions in relation to other means.

Christ's College could not gain an advantage in trade competition through this submission.

The suggested revisions do not limit the generality of the reasons for the submission.

The submitter wishes to be heard in support of their submission.

If others make similar submissions, the submitter will consider presenting a joint case at the hearing.

DATED this 12th day of May 2023

Our proposed Housing and Business Choice and Heritage Plan Changes (13 &14)

Submitter Details

Submission Date: 12/05/2023

First name: Catherine **Last name:** Boulton

Preferred method of contact Email

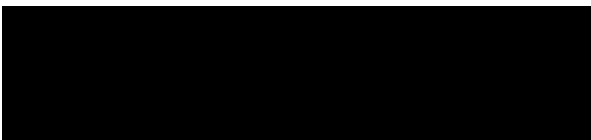
Postal address:

Suburb:

City:

Country: New Zealand

Postcode:



I could not
Gain an advantage in trade competition through this submission

I am
directly affected by an effect of the subject matter of the submission that :
a. adversely affects the environment, and
b. does not relate to the trade competition or the effects of trade competitions.

Note to person making submission:

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991

Would you like to present your submission in person at a hearing?

- ☒ Yes
- ☐ I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Additional requirements for hearing:

If others make similar submissions, the submitter will consider presenting a joint case at the hearing.

Consultation Document Submissions

Original Submitter:

Original Point:

Points: 99.7

- ☐ Support
- ☒ Oppose
- ☐ Seek Amendment

I seek the following decision from the Council
If seeking to make changes to a specific site or sites, please provide the address or identify the area
Please see attached full submission.

My submission is that
Please see attached full submission.

Original Submitter:
Original Point:

Points: 99.8
☐ Support
☐ Oppose
☒ Seek Amendment

I seek the following decision from the Council
If seeking to make changes to a specific site or sites, please provide the address or identify the area
Please see attached full submission.

My submission is that
Please see attached full submission.

Original Submitter:
Original Point:

Points: 99.9
☐ Support
☐ Oppose
☒ Seek Amendment

I seek the following decision from the Council
If seeking to make changes to a specific site or sites, please provide the address or identify the area
Please see attached full submission.

My submission is that
Please see attached full submission.

Attached Documents

File
PC14_Belfast Village Centre Limited Submission_Final

Details of submitter No: 1061 - Elizabeth Harris

Submitter:	Elizabeth Harris
Submitter Address:	

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 12/05/2023

First name: Elizabeth

Last name: Harris

Postal address:

Email:

Daytime Phone:

Would you like to present your submission in person at a hearing?

☐ Yes

Additional requirements for hearing:

Attached Documents

Name
Wigram Lodge - Plan Change 13 Submission - FINAL

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 17/05/2023

First name: Elizabeth

Last name: Harris

Postal address:

Email:

Daytime Phone:

Would you like to present your submission in person at a hearing?

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Attached Documents

Name
Wigram Lodge - Plan Change 13 Submission - FINAL

Form 5

Submission on notified proposal for policy statement or plan, change or variation

Clause 6 of Schedule 1, Resource Management Act 1991

To: **Christchurch City Council**

Name of Submitter: **Elizabeth Harris and John Harris**

Background

1. The Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (**Amendment Act**) requires the Christchurch City Council (**Council**) to include Medium Density Residential Standards (**MDRS**) and to give effect to the National Policy Statement on Urban Development 2020 (**NPS-UD**) in its District Plan. The Council has sought to give effect to this requirement through the notification of Plan Change 14 - Housing and Business Choice (**PC14**) and Plan Change 13 - Heritage (**PC13**).
2. With respect to residential zones, the Amendment Act requires that:
 - (a) every residential zone in an urban environment of a specified territorial authority must give effect to policy 3 of the NPS-UD in that zone; and
 - (b) a territorial authority may create new residential zones or amend existing residential zones.
3. With respect to non-residential zones, the Amendment Act further requires that:
 - (a) the territorial authority must ensure that the provisions in its district plan for each urban non-residential zone within the authority's urban environment give effect to the changes required by policy 3 of the NPS-UD; and
 - (b) a territorial authority may create new urban non-residential zones or amend existing urban non-residential zones.
4. The public notice states that the changes proposed for PC14 are "extensive" and include:
 - (a) increasing height limits in and around the central city, and in suburban centres;
 - (b) changes to rules within commercial zones to ensure high quality urban environments and be more enabling of activities without the need for resource consent;

- (c) medium and high density residential zones with new rules are being introduced across all urban residential areas;
- (d) rezoning of industrial areas near the central city for housing and mixed-use activities;
- (e) introducing qualifying matters to reduce the scale and density of buildings enabled by the MDRS and NPS-UD is reduced; and
- (f) amending objectives, policies, and other provisions throughout the District Plan.

Introduction

- 5. This is a submission on PC13 and PC14 to the Christchurch District Plan made by Elizabeth Harris and John Harris (**the submitter**).
- 6. The submitter owns the property legally described as Section 456 TN of Christchurch as held within the Record of Title 3441868, located at 31 Cashel Street (**the site**).
- 7. The property is located within the Residential Central City Zone under the operative District Plan and is proposed to be Medium Density Residential zone and within the Inner City West Residential Heritage Area under Plan Change 14.

Specific provisions of the plan change that this submission relates to

- 8. The submitter has an interest in the plan changes as a whole and is therefore this submission relates to all provisions of PC13 and PC14. The submitter has a particular interest in all matters that affect the submitters property.

Submission

- 9. The submitter both **supports** and **opposes** the plan change as notified. More specifically:
 - (a) The submitter supports the intensification of urban form to provide for additional development capacity, particularly near the city and commercial centres, and supports any provisions or changes to the District Plan that will achieve this outcome; and
 - (b) The submitter opposes any provisions or changes that will adversely affect the outcome in (a);
 - (c) The submitter requests that the Inner City West Residential Heritage Area overlay is removed from the submitter's property and other properties on Cashel Street; and
 - (d) The submitter requests that its property and other properties on Cashel Street are rezoned to High Density Residential, better reflecting the site context within the Central City and better giving effect to the NPS-UD.
- 10. The protection of historic heritage from inappropriate subdivision, use, and development is a matter of national importance that is required to be

recognised and provided for – section 6(f) of the Resource Management Act 1991.

11. PC13 and PC14 as notified is unreasonable in their coverage of the submitter's property against the backdrop of section 6(f) and affords protection to a number of buildings that do not warrant protection as historic heritage.
12. The flats located on 31 Cashel Street are not a heritage listed building and are not identified as a heritage building within the District Plan. Existing heritage listings sufficiently protect buildings which have meet the criteria for the assessment of significance of heritage values.
13. The Residential Heritage Area overlay unnecessarily complicates any future work on the building and the grounds in the future. The Submitter has long-term plans to redevelop the site, contributing to housing supply in the Inner City.
14. Directly across Cashel Street is High Density Residential with no heritage qualifying matters which could see buildings up to 32m (10 storeys) high. The zoning difference for the two sides of Cashel Street will create a significant disparity in development outcomes and character on Cashel Street.
15. Policy 3 of the NPS-UD is of direct relevance, whereby at sub clause (a) it directs that the district plan is to enable building heights and density of urban form to realise as much *development capacity* as possible, to maximise benefits of intensification in city centre zones.
16. Cashel Street is located in proximity to a centre zone with many employment opportunities, is well serviced by public transport and in an area where there is predicted to be high demand for housing. It is ideally situated to be redeveloped to provide for additional housing, enabling more people to live in the Christchurch urban environment.
17. An appropriate outcome for the submitter's property and other properties n Cashel Street would be to provide for more intense residential development, enabling greater building heights and densities.
18. Rezoning the site to High Density Residential and removing the Inner City West Residential Heritage Area overlay, along with commensurate changes to the District Plan to provide for this submission and give effect to the NPS-UD will:
 - (a) enable more people to live in an urban environment that is near a centre zone and is well-serviced by public transport;
 - (b) contribute to the social and economic well-being of communities and meet the reasonably foreseeable needs of future generations;
 - (c) represent the most appropriate means of exercising the Council's functions, having regard to the efficiency and effectiveness of the provisions relative to other means.
 - (d) give effect to the NPS-UD and Canterbury Regional Policy Statement.

- (e) promote the sustainable management of natural and physical resources, will be consistent with Part 2 of the Resource Management Act 1991 and ultimately achieve its purpose.


Relief Sought

19. The submitter seeks the following relief:
- (a) the submitters site and surrounding sites be rezoned to High Density Residential;
 - (b) remove the Inner City West Residential Heritage Area overlay from the site and other sites on Cashel Street;
 - (c) any other additional or consequential relief to the District Plan, including but not limited to, the maps, issues, objectives, policies, rules, controls/discretions, assessment criteria and explanations that will fully give effect to the matters raised in this submission and the relevant planning legislation.

Other

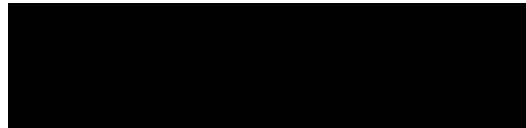
20. The submitter could not gain an advantage in trade competition through this submission.
21. The submitter wishes to be heard in support of this submission.
22. If others make similar submissions, the submitter will consider presenting a joint case at any hearing.

DATED 12 May 2023

pp.  _____

Elizabeth & John Harris

Address for Service:

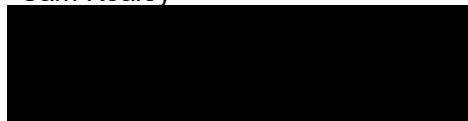


Contact Person:

Sam Kealey

Cell:

E-mail:



Form 5

Submission on notified proposal for policy statement or plan, change or variation

Clause 6 of Schedule 1, Resource Management Act 1991

To: **Christchurch City Council**

Name of Submitter: **Elizabeth Harris and John Harris**

Background

1. The Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (**Amendment Act**) requires the Christchurch City Council (**Council**) to include Medium Density Residential Standards (**MDRS**) and to give effect to the National Policy Statement on Urban Development 2020 (**NPS-UD**) in its District Plan. The Council has sought to give effect to this requirement through the notification of Plan Change 14 - Housing and Business Choice (**PC14**) and Plan Change 13 - Heritage (**PC13**).
2. With respect to residential zones, the Amendment Act requires that:
 - (a) every residential zone in an urban environment of a specified territorial authority must give effect to policy 3 of the NPS-UD in that zone; and
 - (b) a territorial authority may create new residential zones or amend existing residential zones.
3. With respect to non-residential zones, the Amendment Act further requires that:
 - (a) the territorial authority must ensure that the provisions in its district plan for each urban non-residential zone within the authority's urban environment give effect to the changes required by policy 3 of the NPS-UD; and
 - (b) a territorial authority may create new urban non-residential zones or amend existing urban non-residential zones.
4. The public notice states that the changes proposed for PC14 are "extensive" and include:
 - (a) increasing height limits in and around the central city, and in suburban centres;
 - (b) changes to rules within commercial zones to ensure high quality urban environments and be more enabling of activities without the need for resource consent;

- (c) medium and high density residential zones with new rules are being introduced across all urban residential areas;
- (d) rezoning of industrial areas near the central city for housing and mixed-use activities;
- (e) introducing qualifying matters to reduce the scale and density of buildings enabled by the MDRS and NPS-UD is reduced; and
- (f) amending objectives, policies, and other provisions throughout the District Plan.

Introduction

- 5. This is a submission on PC13 and PC14 to the Christchurch District Plan made by Elizabeth Harris and John Harris (**the submitter**).
- 6. The submitter owns the property legally described as Section 456 TN of Christchurch as held within the Record of Title 3441868, located at 31 Cashel Street (**the site**).
- 7. The property is located within the Residential Central City Zone under the operative District Plan and is proposed to be Medium Density Residential zone and within the Inner City West Residential Heritage Area under Plan Change 14.

Specific provisions of the plan change that this submission relates to

- 8. The submitter has an interest in the plan changes as a whole and is therefore this submission relates to all provisions of PC13 and PC14. The submitter has a particular interest in all matters that affect the submitters property.

Submission

- 9. The submitter both **supports** and **opposes** the plan change as notified. More specifically:
 - (a) The submitter supports the intensification of urban form to provide for additional development capacity, particularly near the city and commercial centres, and supports any provisions or changes to the District Plan that will achieve this outcome; and
 - (b) The submitter opposes any provisions or changes that will adversely affect the outcome in (a);
 - (c) The submitter requests that the Inner City West Residential Heritage Area overlay is removed from the submitter's property and other properties on Cashel Street; and
 - (d) The submitter requests that its property and other properties on Cashel Street are rezoned to High Density Residential, better reflecting the site context within the Central City and better giving effect to the NPS-UD.
- 10. The protection of historic heritage from inappropriate subdivision, use, and development is a matter of national importance that is required to be

recognised and provided for – section 6(f) of the Resource Management Act 1991.

11. PC13 and PC14 as notified is unreasonable in their coverage of the submitter's property against the backdrop of section 6(f) and affords protection to a number of buildings that do not warrant protection as historic heritage.
12. The flats located on 31 Cashel Street are not a heritage listed building and are not identified as a heritage building within the District Plan. Existing heritage listings sufficiently protect buildings which have meet the criteria for the assessment of significance of heritage values.
13. The Residential Heritage Area overlay unnecessarily complicates any future work on the building and the grounds in the future. The Submitter has long-term plans to redevelop the site, contributing to housing supply in the Inner City.
14. Directly across Cashel Street is High Density Residential with no heritage qualifying matters which could see buildings up to 32m (10 storeys) high. The zoning difference for the two sides of Cashel Street will create a significant disparity in development outcomes and character on Cashel Street.
15. Policy 3 of the NPS-UD is of direct relevance, whereby at sub clause (a) it directs that the district plan is to enable building heights and density of urban form to realise as much *development capacity* as possible, to maximise benefits of intensification in city centre zones.
16. Cashel Street is located in proximity to a centre zone with many employment opportunities, is well serviced by public transport and in an area where there is predicted to be high demand for housing. It is ideally situated to be redeveloped to provide for additional housing, enabling more people to live in the Christchurch urban environment.
17. An appropriate outcome for the submitter's property and other properties n Cashel Street would be to provide for more intense residential development, enabling greater building heights and densities.
18. Rezoning the site to High Density Residential and removing the Inner City West Residential Heritage Area overlay, along with commensurate changes to the District Plan to provide for this submission and give effect to the NPS-UD will:
 - (a) enable more people to live in an urban environment that is near a centre zone and is well-serviced by public transport;
 - (b) contribute to the social and economic well-being of communities and meet the reasonably foreseeable needs of future generations;
 - (c) represent the most appropriate means of exercising the Council's functions, having regard to the efficiency and effectiveness of the provisions relative to other means.
 - (d) give effect to the NPS-UD and Canterbury Regional Policy Statement.

- (e) promote the sustainable management of natural and physical resources, will be consistent with Part 2 of the Resource Management Act 1991 and ultimately achieve its purpose.

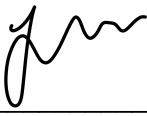
Relief Sought

19. The submitter seeks the following relief:
- (a) the submitters site and surrounding sites be rezoned to High Density Residential;
 - (b) remove the Inner City West Residential Heritage Area overlay from the site and other sites on Cashel Street;
 - (c) any other additional or consequential relief to the District Plan, including but not limited to, the maps, issues, objectives, policies, rules, controls/discretions, assessment criteria and explanations that will fully give effect to the matters raised in this submission and the relevant planning legislation.

Other

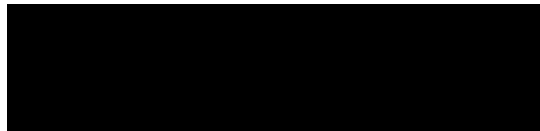
20. The submitter could not gain an advantage in trade competition through this submission.
21. The submitter wishes to be heard in support of this submission.
22. If others make similar submissions, the submitter will consider presenting a joint case at any hearing.

DATED 12 May 2023

pp.  _____

Elizabeth & John Harris

Address for Service:

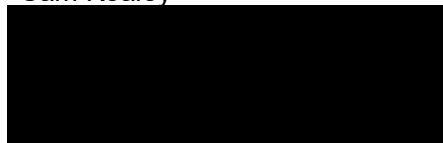


Contact Person:

Sam Kealey

Cell:

E-mail:



Details of submitter No: 1062 - Alice Burnett

Submitter:	Alice Burnett
Submitter Address:	
Behalf of:	Hughes Developments Limited

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 12/05/2023

First name: Alice

Last name: Burnett

On behalf of:

Postal address:

Email:

Daytime Phone:

Would you like to present your submission in person at a hearing?

Yes

Additional requirements for hearing:

Consultation Document Submissions

Provision: Chapter 9 Natural and Cultural Heritage

Seek Amendment

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

see attached

My submission is that:

see attached

Attached Documents

Name
Submission to PC13 HDL

SUBMISSION ON THE PROPOSED PLAN CHANGE 14, CHRISTCHURCH DISTRICT PLAN*in accordance with Clause 6 of the Schedule 1 of the Resource Management Act 1991*

TO: Christchurch City Council
engagement@ccc.govt.nz

1. Submitter Details

Submitters name: Hughes Developments Limited

Address For Service:

Contact person:

Phone:

**2. Trade Competition:**

We could gain an advantage in trade competition through this submission: ☐ Yes ☒ No

If Yes to above, then:

We are directly affected by an effect of the subject matter of the submissions that:

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition ☐ Yes ☒ No

3. Hearing options:

Do you wish to be heard in support of your submission? *If you choose yes, you can choose not to speak when the hearing date is advertised.*

☒ Yes ☐ No

If others are making a similar submission would you consider presenting a joint case with them at the hearing? *You can change your mind once the hearing has been advertised.*

☒ Yes ☐ No

4. Submission Details

☐ Yes, I am enclosing further supporting information to this submission form

Provision to which my/our submission relates: <i>(Please specify the Objective, Policy, Rule, Rule Requirement, Assessment Matter, Mapping feature or other reference your submission relates to, eg TCZ-R12 Visitor Accommodation)</i>	My position on this provision is: <i>(Select one option)</i>	The reasons for my/our submission are: <i>(Please give details, eg I think this should be non-complying because we don't want this to occur in our town centre)</i>	The decision I/we want Council to make: <i>(Please specify if you want the provision to be retained, amended or deleted, eg Amend – change the activity status to non-complying)</i>
Planning Maps and Chapter 9.3	Oppose in Part	31 Worcester Boulevard is a vacant site. The documentation within Plan Change 13 refers to this site having a building on it. It is unclear how the rules relating to Residential Heritage Areas relate to new buildings in this overlay.	We seek that the rules are clearer for how new development is to occur within the Residential Heritage Area Overlay AND Remove all documentation and references to 31 Worcester Boulevard containing buildings on it.
Chapter 9.3	Oppose in Part	21 Worcester Boulevard has been updated and renovated since the preparation of the heritage assessment (RMA/2020/1713). This assessment referred to in Chapter 9.3 does not reflect what the site looks like and is used for. It is unclear in the provisions how often these assessments need to be updated, if at all.	We seek clarity on the status of the heritage assessments in light of any resource consents granted for sites which will change the site to what is portrayed in the heritage assessment.

Alice Burnett

12 May 2023

Signature of person authorised to sign on behalf of submitter

Details of submitter No: 1063 - Marie Byrne

Submitter:	Marie Byrne
Submitter Address:	

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 12/05/2023

First name: Marie

Last name: Byrne

Postal address:

Email:

Daytime Phone:

Would you like to present your submission in person at a hearing?

Yes

Additional requirements for hearing:

Consultation Document Submissions

Provision: Chapter 9 Natural and Cultural Heritage

Seek Amendment

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

Chapter 9 Schedule of Significant Heritage: Medium Density Residential area in Phillipstown Cashel Street to Ferry Road, Bordesley Street to Nursery Road be considered for a heritage area and subsequently a qualifying matter.

My submission is that:

Regarding Chapter 9 Schedule of Significant Heritage areas: I would like to suggest that the Medium Density Residential area in Phillipstown Cashel Street to Ferry Road, Bordesley Street to Nursery Road be considered for a heritage area protecting an area of former workers cottages. In 1936 a metropolitan planning scheme was proposed that expanded industrial areas into the residential areas of Sydenham and Phillipstown. Although the areas were not fully and formally zoned until the first review of the district planning scheme in 1968, residential housing made way for industry in those 30 years. There are heritage areas that protect workers cottages in Sydenham, but nothing in Phillipstown. Existing former workers housing in Phillipstown is increasingly being lost for multi-unit development. Without a heritage provision, the Council is allowing final removal that was initiated nearly ninety years ago. These cottages have the potential to provide affordable housing options, particularly for first home buyers. However first home buyers are being out bid of the market by developers buying the properties and demolishing them. The Council has the opportunity to stop both the loss of heritage and provide for greater affordable home options. (Historical Reference: Christchurch City Contextual History Overview - 2005)

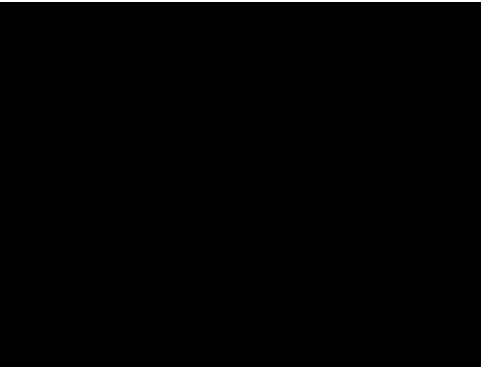
Our proposed Housing and Business Choice and Heritage Plan Changes (13 &14)

Submitter Details

Submission Date: 09/05/2023

First name: Terri **Last name:** Winder

Preferred method of contact Email



I could not
Gain an advantage in trade competition through this submission

I am not
directly affected by an effect of the subject matter of the submission that :
a. adversely affects the environment, and
b. does not relate to the trade competition or the effects of trade competitions.

Note to person making submission:

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991

Would you like to present your submission in person at a hearing?

- ☒ Yes
- ☐ I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Additional requirements for hearing:

Refer to submission.

Consultation Document Submissions

Original Submitter:

Original Point:

Points: 50.3

- ☐ Support
- ☒ Oppose
- ☐ Seek Amendment

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area

Refer to attached submission.

My submission is that

Due to the ambiguity regarding which provisions are notified under PC13 and PC14, the submitter lodges their submission on both to ensure that it applies to PC13 and PC14.

Refer to attached submission.

Attached Documents

File
J16644 Ceres PC13 and PC14 Submission FINAL 20230508

8 May 2023

Our Reference: J16644

Mark Stevenson
Christchurch City Council
c/o Engagement Team
Email: engagement@ccc.govt.nz

Dear Mark,

**SUBMISSION ON A NOTIFIED PROPOSAL FOR A POLICY STATEMENT OR PLAN, CHANGE OR VARIATION
CLAUSE 6 OF SCHEDULE 1 AND VIA INTENSIFICATION PLANNING INSTRUMENT (IPI) IN ACCORDANCE WITH
SECTION 80F(1)(a), RESOURCE MANAGEMENT ACT 1991**

**SUBMISSION ON HERITAGE PLAN CHANGE (PC13) AND HOUSING AND BUSINESS CHOICE PLAN CHANGE
(PC14)**

Purpose of Submission

This letter is a submission on the Heritage Plan Change ("PC13") and Housing and Business Choice Plan Change ("PC14") proposed by the Christchurch City Council ("Council") prepared by Planz Consultants Limited ("Planz") on behalf of Ceres New Zealand, LLC ("Ceres").

Ceres will not gain an advantage in trade competition through this submission.

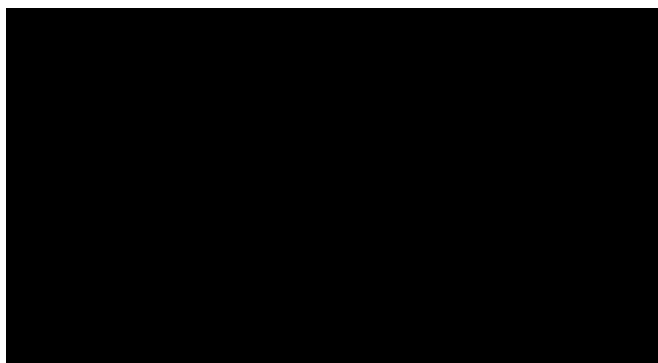
Ceres will not be directly affected by an effect of the subject matter of the submission that:

- a. adversely affects the environment; and
- b. does not relate to the trade competition of the effects of trade competition.

Ceres wishes to be heard in support of this submission and would agree to consider presenting a joint case with other submitters who make a similar submission.

Submitters details

Submitter	Ceres New Zealand, LLC
Contact Name	Swaroop Gowda
Address for Service	Ceres New Zealand, LLC



Submission

This submission has been prepared by following the Council's notification of PC13 and PC14 in relation to 25 Peterborough Street, Central City, Christchurch and 87-93 Victoria Street, Central City, Christchurch.

The location of 25 Peterborough Street is depicted in Figure 1. Under PC13 and PC14, 25 Peterborough Street is located within the City Centre Zone (Figure 2) and subject to the following overlays.

- Heritage Setting – Setting #281
- Heritage Item – Item #440 – Highly Significant
- Central City Building Height 32m Overlay
- Significant and other Trees - Significant Tree #274.

The location of 87-93 Victoria Street is depicted in Figure 1. Under PC13 and PC14, 87-93 Victoria Street is located within the City Centre Zone (Figure 2) and subject to the following overlays.

- Cathedral Square and Victoria Street Precinct
- Victoria Street Height
- Heritage Setting – Setting #296
- Heritage Item – Item #529 – Highly Significant
- Central City Building Height 45m Overlay



Figure 1 Location of 25 Peterborough Street within orange boundaries and 87-93 Victoria Street within red boundaries (Canterbury Maps)

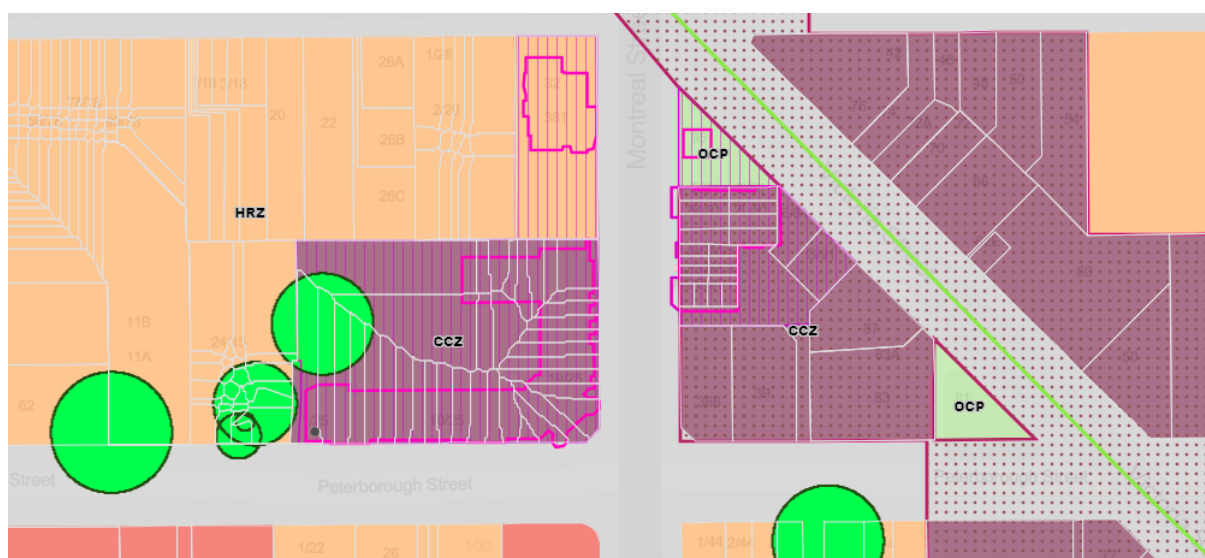


Figure 2 PC13 and PC14 Zoning of 25 Peterborough Street and 87-93 Victoria Street (PC13 and PC14 GIS)

PC13

Chapter 9.3 Historic Heritage

Ceres **oppose** changes to the proposed Chapter 9.3 Historic Heritage (as notified on 17 March 2023) for the following reasons.

- Point 1. The proposed policies, rules, matters of discretion, and schedules do not reflect significantly damaged heritage buildings which are uneconomical to repair, restore, and/or reconstruct.
- Point 2. Resultant of deleting a rule and matters of discretion relating to buildings which sustained damage in the Canterbury earthquakes of 2010 and 2011, it is unclear how the several significantly damaged heritage buildings in Christchurch which remain in a state of disrepair will be managed from a planning perspective.
- Point 3. The retention of Significant Tree #274 impedes the redevelopment of 25 Peterborough Street and, in turn, the use / reuse of the property and building therein.

Point 1

There are several heritage buildings within the city which remain significantly damaged, derelict, and vacant (e.g., 25 Peterborough Street and 91-93 Victoria Street), albeit the city is approximately 12 years post the Canterbury earthquakes.

Policy 9.3.2.2.3 (as notified) seeks for heritage items to be managed in a way that provides for the ongoing use / adaptive reuse of heritage buildings in a manner that is sensitive to their heritage values while recognising the need for works to be undertaken to accommodate their long-term retention and use, and the associated engineering and financial factors. Additionally, this policy seeks to recognise the need for a flexible approach to heritage management, with particular regard to enabling repairs, restoration, and reconstruction, in a manner which is sensitive to the heritage values of the scheduled historic heritage.

However, repairing a significantly damaged heritage building will involve a large volume of reconstruction and restoration work meaning that the resultant building is more likely than not to be a replica, rather than the original heritage fabric. Considering this, short- and long-term financial factors (i.e., repair / reconstruction costs, rental yield, etc.) greatly influence the ongoing use / adaptive reuse of a significantly damaged heritage building. For example, if the cost to repair / reconstruct a significantly damaged heritage building outweighs the long-term financial return then it would be uneconomical to pursue redevelopment options. Consequentially, damaged heritage buildings may be left in a damaged and derelict state or demolished entirely.

Considering the above, this policy (as notified) does not fully recognise the great impact financial factors contribute to the commercial decision of repairing, restoring, and reconstructing a significantly damaged heritage building to foster its use / reuse. Notably, sensitivity towards financial factors seems to understate its influence.

Additionally, Rule 9.3.4.1.5 (NC1) (as notified) does not fully recognise / reflect the need to demolish a significantly damaged heritage building that would be uneconomical to repair, restore, or reconstruct. The Non-Complying Activity status seems excessive / onerous given the nature of the damage sustained by a highly significant heritage item, and cost to repair / reconstruct.

Considering the above, Ceres seek the following decisions:

- a. **Create** a schedule identifying significantly damaged heritage items which face significant challenges to their ongoing restoration and economic reuse. Given that 12 years have elapsed since the earthquakes, these buildings are well known and able to be readily distinguished from buildings that are habitable and occupied. The list is narrow, is likely to extend to no more than a dozen or so buildings, and could include the following: Victoria Mansions, Peterborough Centre, Harley Chambers (Cambridge Tce), Englefield House (Fitzgerald Ave), Empire Hotel (Norwich Quay), Daresbury (Daresbury Lane), and the Dux/ Student Union building at the Arts Centre.
- b. **Add** a focussed policy within Chapter 9.3 which better reflects and recognises significantly damaged heritage items (identified in the schedule created as part of point a above) which face significant challenges to their repair and reuse. It is artificial for the policy and rule framework to ignore the post-quake reality that there are a number of significantly damaged heritage items and to not provide any differentiation between how intact and badly damaged buildings are to be managed.
- c. **Add** a Restricted Discretionary Activity provision (RD9) to Rule 9.3.4.1.3 for the repair, restoration, reconstruction, or alteration of a heritage item identified in the schedule created as part of point a above. The Matters of Discretion applicable to this rule will be those detailed in point e below.
- d. **Add** a Restricted Discretionary Activity provision (RD10) to Rule 9.3.4.1.3 for the demolition of a heritage item identified in the schedule created as part of point a above. The Matters of Discretion applicable to this rule will be those detailed in point e below.
- e. **Add** a Matter of Discretion provision to Rule 9.3.6 relating to the provision of a heritage restoration assessment or a heritage demolition assessment (the latter being applicable if the heritage item is to be demolished); engineering and Quantity Surveying evidence; photographic records; and a deconstruction salvage plan.

Point 2

There are several heritage buildings within Christchurch which remain significantly damaged and vacant because of the various Canterbury earthquakes. The Operative Christchurch District Plan ("Operative Plan") specifically provided Rules and Matters of Discretion relating to the upgrade, replacement, reconstruction, restoration, alteration, and relocation of a heritage item.

However, resultant of PC13, these Rules and Matters of Discretion are proposed to be deleted, or significantly altered so that the resultant effect is entirely different to that of the Operative Plan. This approach seems premature while there continue to be several significantly damaged heritage buildings within Christchurch.

Ceres seek the following decision:

- a. **Delete** the PC13 proposed changes to Rule 9.3.4.1.1 (P9) and proposed deletion of P11 and P12 and Matter of Discretion 9.3.6.1.

Point 3

As a consequence of earthquake damage, the heritage building at 25 Peterborough Street may require significant reconstruction (potentially including demolition works) to reuse the building and property. The Horizontal Elm established on the site, which is identified as being significant, is located behind the

existing building and its visibility from adjacent properties and public spaces is largely blocked by built form. The precise location of the Horizontal Elm will highly likely restrict / impede the reconstruction / redevelopment of the building and property by limiting layout and design options. However, resultant of removing the Horizontal Elm, more options may be available for the reuse of the property and building including the area located at the centre.

Ceres seek the following decision:

- a. **Remove** the Horizontal Elm (*Ulmus glabra Horizontalis*) tree located on 25 Peterborough Street (Significant Tree #274) from Appendix 9.4.7.1 Schedules of significant trees (Christchurch City and Banks Peninsula).
- b. **Remove** the Significant and other Trees overlay applied to 25 Peterborough Street and update Planning Map 32C and H10 accordingly.

PC14

Chapter 15 Commercial

Ceres **oppose** changes to the proposed Chapter 15 Commercial (as notified on 17 March 2023) for the following reasons.

- Point 4. There is ambiguity regarding the height standards / overlay applicable to the 25 Peterborough Street and 87-93 Victoria Street which, in turn, causes confusion and poor application of the provisions.
- Point 5. The height standards / overlay applicable to the 25 Peterborough Street and 87-93 Victoria Street, in conjunction with Standards 15.11.2.11, 15.11.2.12, 15.11.2.14, 15.11.2.15, and 15.11.2.16, are contrary to Policy 3 of the National Policy Statement on Urban Development 2020 ("NPS-UD").
- Point 6. Policy 15.2.4.1.a.iii is contrary to Policy 3 of the NPS-UD

Point 4

With regards to building height standards applicable to 25 Peterborough Street, the following is noted.

- Pursuant to Standard 15.11.2.11.a.i of PC14, the maximum height of any building on the property is 90m, and the maximum height of the building base is 28m.
- Pursuant to Standard 15.11.2.11.a.vi of PC14, the maximum height of all buildings in the Central City Heritage Qualifying Matter and Precinct is 28m.
- Pursuant to Standard 15.11.2.12 of PC14, the maximum height of the road wall of any building on the property shall be ... for sites located on a street intersection, a maximum height of 28m for a maximum distance of 30m from the street corner.
 - 25 Peterborough Street comprises several unit titles with a Stratum in Freehold estate. In the case of strata titles, PC14 defines site as meaning the underlying certificate of title of the entire land immediately prior to subdivision. Considering this, 25 Peterborough Street is entirely located on a street intersection.
- As previously mentioned, 25 Peterborough Street is subject to the Central City Building Height 32m Overlay pursuant to PC14.

With regards to building height standards applicable to 87-93 Victoria Street, the following is noted.

- Pursuant to Standard 15.11.2.11.a.v of PC14, the maximum height of all buildings on the property (as its located within the Victoria Street Height Precinct) is 45m, and the maximum height of the building based is 28m.
- Pursuant to Standard 15.11.2.11.a.vi of PC14, the maximum height of all buildings in the Central City Heritage Qualifying Matter and Precinct is 28m.
- As previously mentioned, 87-93 Victoria Street is subject to the Central City Building Height 45m Overlay pursuant to PC14.

Notably, there is no link between Standards 15.11.2.11 and 15.11.2.12 of PC14 and the Central City Maximum Building Height Planning Map including its overlays.

Considering the above, the various height standards / overlays applicable to 25 Peterborough Street and 87-93 Victoria Street create confusion and will result in poor application due to the ambiguity.

Additionally, the various height standards / overlays are contrary to Policy 3 of the NPS-UD for the reasons detailed below. Specifically, the heights standards / overlays applicable to 25 Peterborough Street and 87-93 Victoria Street as notified do not maximise the benefits of intensification.

An appropriate maximum height of any building on 25 Peterborough Street and 87-93 Victoria Street would be 90m to enable an economical redevelopment of both properties and restoration of the heritage buildings therein.

Ceres seek the following decision:

- a. **Remove** the Central City Heritage Qualifying Matter and Precinct applied to 25 Peterborough Street and 87-93 Victoria Street and update the planning maps accordingly.
- b. **Remove** the Central City Building Height 32m Overlay from 25 Peterborough Street and update the Central City Maximum Building Height Planning Map accordingly.
- c. **Remove** the Central City Building Height 45m Overlay from 87-93 Victoria Street and update the Central City Maximum Building Height Planning Map accordingly.
- d. **Remove** 87-93 Victoria Street from the Victoria Street Height Precinct and update the planning maps accordingly.
- e. **Delete** Standard 15.11.2.12.
- f. **Add** an exemption to Standard 15.11.2.11 which states that clauses ii to vi of Standard 15.11.2.11.a do not apply to any site containing a significant heritage item.
- g. **Add** an exemption to Standard 15.11.2.12 which states that clause a of Standard 15.11.2.12 does not apply to any site containing a significant heritage item.
- h. **Add** an exemption to Standard 15.11.2.14 which states that clause a of Standard 15.11.2.14 does not apply to any site containing a significant heritage item.
- i. **Add** an exemption to Standard 15.11.2.15 which states that clause a of Standard 15.11.2.15 does not apply to any site containing a significant heritage item.
- j. **Add** an exemption to Standard 15.11.2.16 which states that clause a of Standard 15.11.2.16 does not apply to any site containing a significant heritage item.

Point 5

Policy 3 of the NPS-UD states “In relation to tier 1 urban environments, regional policy statements and district plans enable:

- a) in city centre zones, building heights and density of urban form to realise as much development capacity as possible, to maximise benefits of intensification; ...”

The various height standards of Standards 15.11.2.11 and 15.11.2.12 and building height overlays applicable to 25 Peterborough Street and 87-93 Victoria Street are detailed in Point 4 above.

With regards to density of urban form, the following standards of PC14 are relevant to both properties.

- Standard 15.11.2.1 (Building setback and continuity)
- Standard 15.11.2.3 (Sunlight and outlook for the street)
- Standard 15.11.2.9 (Sunlight and outlook at boundary with a residential zone)
- Standard 15.11.2.10 (Minimum setback from the boundary with a residential zone)
- Standard 15.11.2.14 (Building tower setbacks)
- Standard 15.11.2.15 (Maximum building tower dimension and building tower coverage)
- Standard 15.11.2.16 (Minimum building tower separation)

The tenets of the standards bullet pointed above will not be traversed. However, when these standards are applied to 25 Peterborough Street and 87-93 Victoria Street, in conjunction with the height standards and overlays, any redevelopment of these properties and buildings therein will be restricted and impeded in both its height and density options. Ceres engaged several experienced architectural firms to develop concept plans for 25 Peterborough Street to deliver a multi-storey apartment or hotel development. All proposed designs are considered to deliver high quality urban design outcomes, yet none of them would

comply with the 'podium and tower' typology which PC14 appears to seek and consider as being the only acceptable design solution.

Applying the height standards / overlays, in conjunction with the standards bullet pointed above to the redevelopment of small or unusually shaped land parcels (which are common through the city centre) will be extremely challenging.

Resultant of applying these standards / overlays, in most costs, the redevelopment of any city centre zone site (including 25 Peterborough Street and 87-93 Victoria Street) will result in a financial return significantly less than that achievable through the Operative Plan. Consequentially, it may be uneconomical to develop / redevelop many city centre sites including those occupied by significantly damaged buildings (which would be left in a state of disrepair / derelict) or those undeveloped and vacant.

Consequentially, Standards 15.11.2.1, 15.11.2.3, 15.11.2.9 to 15.11.2.12, and 15.11.2.14 to 15.11.2.16 and the building height overlays of PC14 do not maximise the benefits of intensification and, therefore, are contrary to Policy 3 of the NPS-UD.

Ceres seek the following decision:

- a. **Delete** Standards 15.11.2.11, 15.11.2.12, 15.11.2.14, 15.11.2.15, and 15.11.2.16

Point 6

Rule 15.11.1.1.c limits the permitted activities undertaken at 25 Peterborough Street to those detailed within Rules 15.11.1.1 (P13), (P14), and (P17) pursuant to PC14.

Rule 15.11.1.1 (P13) relates to residential activity with various activity specific standards.

Rule 15.11.1.1 (P14) relates to visitor accommodation with various activity specific standards.

Rule 15.11.1.1 (P17) states "the following activities in the Former Christchurch Teachers College building at 25 Peterborough Street:

- i. Retail activity
- ii. Commercial services
- iii. Entertainment activity
- iv. Gymnasium
- v. Education activity
- vi. Health care facility
- vii. Office
- viii. Art studios and workshops
- ix. Preschool"

Rule 15.11.1.1 (P17) of PC14 is a carryover from the Operative Plan, specifically Rule 15.10.1.1 (P17).

Rule 15.11.1.1 (P17) significantly impacts the redevelopment of 25 Peterborough Street and the building therein by limiting the land uses and associated scale that are permitted to operate from this property. As previously mentioned, repairing, reconstructing, and / or redeveloping 25 Peterborough Street and its significantly damaged heritage building will be at a great cost. This cost will be weighed against the long-term economic benefit of the work and, therefore, the use of 25 Peterborough Street needs to be maximised. This can be achieved by enabling appropriate land uses to operate from 25 Peterborough Street as permitted activities, without limiting their scale. Rules 15.11.1.1 (P1) to (P15) detail land uses anticipated within the City Centre Zone and Ceres consider these same uses and associated scales to be appropriate to operate from 25 Peterborough Street.

Rule 15.10.1.1 (P17) of the Operative Plan was largely proposed by Ceres in their submission on the Christchurch District Plan 2015. However, since the 2015 submission, Ceres have a greater awareness of the significant scope of works and associated cost to repair, restore, or reconstruct 25 Peterborough Street. To balance those costs, Ceres need to be able to maximise the built form and land use opportunities available for 25 Peterborough Street. The Section 32 Evaluation Report for the Commercial Sub-Chapters and supporting documentation does not provide any reasoning for the retention of Rule 15.11.1.1 (P17) of PC14. Therefore, it does not seem sensible to restrict the land uses or control land uses that operate from 25 Peterborough Street any differently to the wider City Centre Zone. Hence, Rule 15.11.1.1 (P17) of PC14 should be deleted as it does not foster the restoration / redevelopment of 25 Peterborough from an economical / financial perspective.

Ceres seek the following decision:

- a. **Delete** Rule 15.11.1.1.c
- b. **Delete** Rule 15.11.1.1 (P17)
- c. **Retain** activity specific standard b of Rules 15.11.1.1 (P13) and (P14).

Point 7

Policy 15.2.4.1 states:

- a. Provide for development of a significant scale and form massing that reinforces the City's distinctive sense of place and a legible urban form by: ...
 - iii. limiting building height along Victoria Street where taller buildings are inappropriate due to the potential impact on legibility of the city centre form and dominance impacts on adjoining residential neighbourhoods.

For the reasons detailed within point 5 above, tenet iii of Policy 15.2.4.1.a is contrary to Policy 3 of the NPS-UD as limiting building heights along Victoria Street does not maximise the benefit of intensification.

The scale and massing of development within the City Centre Zone is controlled through the standards. The various relevant standards ensure that building heights are limited to that appropriate for the wider city centre form and its legibility, as well as adjoining residential neighbourhoods. Therefore, tenet iii of Policy 15.2.4.1.a is unnecessary.

Ceres seek the following decision:

- a. **Delete** Rule 15.2.4.1.a.iii.

Summary

Ceres generally support PC13 and PC14 on the basis that the modifications detailed above are adopted.

Yours faithfully

PLANZ CONSULTANTS LTD



Terri Winder

Consultant Planner



Details of submitter No: 1065 - Graham Robinson

Submitter:	Graham Robinson
Submitter Address:	[REDACTED]

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 12/05/2023

First name: Graham

Last name: Robinson

Postal address:

Email:

Daytime Phone:

Would you like to present your submission in person at a hearing?

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Consultation Document Submissions

Provision: Chapter 9 Natural and Cultural Heritage

Seek Amendment

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

that the Teddington Lockup be added to the District Plan Heritage Schedule.

My submission is that:

the Teddington Lockup (153 Governor's Bay-Teddington Road) should be scheduled as a heritage item in the District Plan, for its high heritage values.

The two-cell lockup was built in 1877 as part of a larger police complex that included a police house and stables. The lockup is the only building remaining on site from this time.

Details of submitter No: 1067 - Catherine Elvidge

Submitter:	Catherine Elvidge
Submitter Address:	[REDACTED]

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 12/05/2023

First name: Catherine

Last name: Elvidge

Postal address:

Email:

Daytime Phone:

Would you like to present your submission in person at a hearing?

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Consultation Document Submissions

Provision: Chapter 9 Natural and Cultural Heritage

Seek Amendment

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

That the 16 Papanui War Memorial Avenues not be listed as a heritage item in Appendix 9.3.7.2.

Alternatively I seek that:

- The listing be amended to include the specific aspects of the streets which comprise the item.
- The plaques not be included in the listing.
- A street-by-street assessment of each street be undertaken and only trees from the original memorial planting or others of significant landscape value be listed.
- The trees be included in sub-chapter 9.4 Significant and other trees, rule 9.4.1.1 P6 and P12, instead of sub-chapter 9.3 Historic heritage.

My submission is that:

Refer attached submission

Provision: Chapter 9 Natural and Cultural Heritage

Seek Amendment

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

That the 16 Papanui War Memorial Avenues not be listed as a heritage item in Appendix 9.3.7.2.

Alternatively I seek that:

- The listing be amended to include the specific aspects of the streets which comprise the item.
- The plaques not be included in the listing.
- A street-by-street assessment of each street be undertaken and only trees from the original memorial planting or others of significant landscape value be listed.
- Those trees with significant landscape value be included in sub-chapter 9.4 Significant and other trees, rule 9.4.1.1 P6 and P12, instead of sub-chapter 9.3 Historic heritage.

My submission is that:

Refer attached

Attached Documents

Name
PC13 submission on Papanui War Memorial Avenues - C Elvidge

Submission on Plan Change 13 – Heritage

From: Catherine Elvidge, [REDACTED] (Note: I am making this submission in my capacity as a resident)

Sixteen **Papanui War Memorial Avenues** are proposed to be scheduled in Appendix 9.3.7.2 as a Highly Significant heritage item. The section 32 report states that "these are proposed to be scheduled as one item, with scheduling protection of the trees and plaques." (para 2.2.21 p.) However the proposed listing in Appendix 9.3.7.2 only lists the streets and describes the item as "Papanui War Memorial Avenues". It does not state that the protection relates only to the trees and plaques, so the implication is that the whole of the street is protected - although it is unclear what this would mean in practice. If the heritage item relates only to the plaques and trees this should be specified in the schedule.

It is unclear from the s32 report what protection will be afforded the plaques and trees as a result of their listing. None of the existing or proposed rules in Chapter 9.3 Historic heritage appear to apply to either the plaques or the trees.

Existing rule 8.9.2.1 P1 requires that earthworks must not occur within 5m of a heritage item. Would this setback apply to the trees and the plaques, or all of the property boundaries along the whole street given that only the streets are referenced in the listing in Appendix 9.3.7.2? Even if only the trees and plaques, it would include any earthworks on private property within 5m of these. Breach of 8.9.2.1 P1 in respect of the trees and/or plaques would require resource consent under 8.9.2.3 RD1, with the relevant matters of discretion being those in 8.9.4.8 which refers to the historic heritage matters in 9.3.6.1. These require consideration of the maintenance and enhancement of heritage values. As such, the heritage values of the item need to be able to be clearly identified. This is not the case with the proposed Memorial Avenue provisions in PC13. Further, there is no resource management benefit gained from requiring consent for earthworks within 5m of the plaques. Such earthworks would not affect the plaques at all given their location on lampposts.

Trees

The Statement of Significance in Appendix 6 of the s32 report (copy on pages 4 and 5 of this submission) outlines the planting of memorial trees between 1943 - 1946, and refers *inter alia* to:

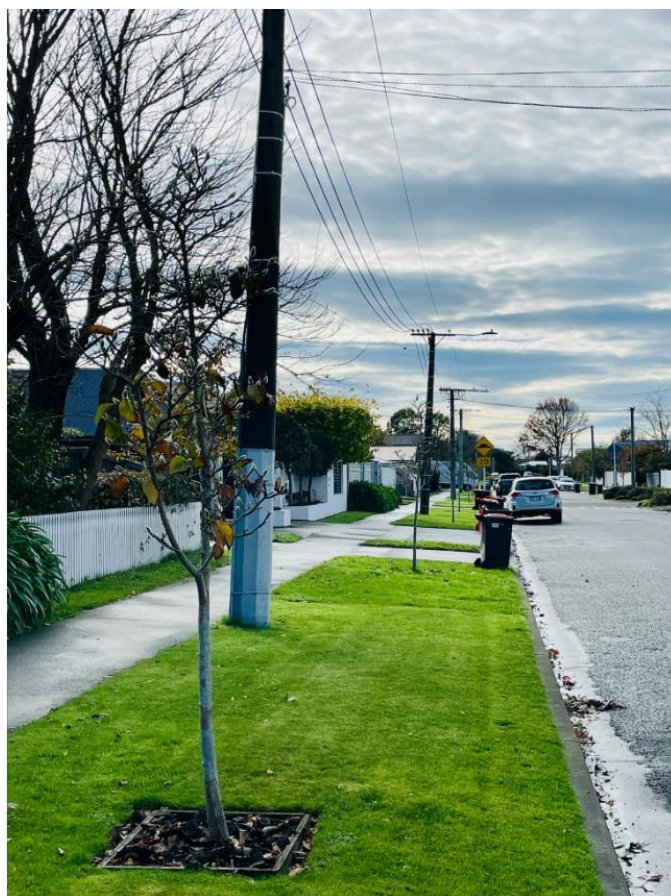
- the streets having "architectural and aesthetic significance for their landscape values".
- the trees creating a strong aesthetic for the streets "due to their scale, colour, texture and seasonal change".
- Technological and craftsmanship significance for the range of different tree species represented, "specifically chosen for their physical characteristics and the soils in the area", and "the planting and maintenance methods and techniques used".
- "high contextual significance for the groups of tree species planted in each individual street".

I acknowledge that the statements of significance are included for information purposes only and do not form part of PC13 or the District Plan itself. However they do outline the heritage values of the items, and as such will help inform the assessment of applications for resource consent for any breach of associated rules, as there is no explanation about the particular heritage value of the trees or plaques within PC13 itself.

The original trees referred to in the Statement of Significance are no longer present in many of the listed streets. As an example, Halton Street did not have any significant street trees when we purchased our property in 1999, and the current street trees (magnolias) planted when the street was kerb and channelled in the mid-2000s have not thrived and are still very small (refer photos). They do not provide significant landscape value, do not create a strong aesthetic due to scale, colour or texture, and do not appear to have any relationship to the original trees. As such, it appears that the stated reasons for including the memorial streets in the heritage item do not actually apply to this street. The same is true for some of the other streets. In comparison, others among the listed memorial streets (e.g. Dormer Street) do contain mature trees which provide significant landscape and amenity value consistent with the Statement of Significance and are worthy of protection.

It is submitted that a street-by-street assessment should be carried out on each of the 16 streets, and only those containing the original memorial street trees or mature replacement trees with similar landscape value should be included in the heritage listing.

Notwithstanding the above, if the trees are to be protected, I submit that this would be more appropriately done in sub-chapter 9.4 Significant and other trees, e.g. by including reference to the relevant Papanui War Memorial Avenues within the activity specific standards in rule 9.4.1.1 P6 and P12.



Existing streetscape – trees are difficult to see due to light conditions, but it shows that they are not a significant landscape feature within the streetscape.

Plaques

It is unclear how the plaques would be afforded any protection by listing them in Appendix 9.3.7.2 of the District Plan. They are located on street light poles, which are not subject to any rules in the plan other than general enabling provisions in Chapter 11 Utilities. The poles, plaques and land on which they are located are under the ownership of the Council (as noted in s32 report, para 3.5.6) so members of the public are not entitled to remove or alter them, and the heritage significance of these streets should be taken into consideration by the relevant Council unit when any works are proposed within these road reserves. Listing the plaques themselves in the District Plan is unnecessary and of no benefit.



Existing streetscape looking towards Harley Ave showing plaque and trees.

**CHRISTCHURCH DISTRICT PLAN – SCHEDULED HERITAGE PLACE
HERITAGE ASSESSMENT – STATEMENT OF SIGNIFICANCE
HERITAGE ITEM NUMBER 1459**

**PAPANUI WAR MEMORIAL AVENUES - ALPHA AVENUE,
CLAREMONT AVENUE, CONDELL AVENUE, DORMER STREET,
GAMBIA STREET, HALTON STREET, HARTLEY AVENUE, KENWYN
AVENUE, LANSBURY AVENUE, NORFOLK STREET, PERRY STREET,
SCOTSTON AVENUE, ST JAMES AVENUE, TILLMAN AVENUE,
TOMES ROAD, WINDERMERE ROAD, CHRISTCHURCH**



Photo- Christchurch City Council heritage files

The Papanui War Memorial Avenues are of overall High Significance to Christchurch and Banks Peninsula.

The Papanui War Memorial Avenues, 16 Streets with trees and plaques, are of high historical and social significance for their association with World War II, and its impact on Christchurch communities. The trees are associated with Harry Tillman, the Christchurch and Papanui Beautifying Associations and the Papanui Returned Services Association, who requested between 1943-1946 that Council plant memorial trees in a variety of species in Papanui streets as a living memorial to the memory of fallen soldiers. Council planted and agreed to maintain the trees, and residents of the Papanui District were required to contribute to the costs of the trees as well as the plaques. The local RSA also contributed to costs.

The Papanui War Memorial Avenues are of high cultural and spiritual significance as memorials to fallen servicemen from the Papanui District. Over time they have come to be identified by parts of the community as memorials to fallen servicemen from the Christchurch District. Members of the Papanui community, and the Papanui RSA have expressed their value of the memorials for the community and the city, and there are regular commemorative events associated with the avenues and trees.

The Papanui War Memorial Avenues are of architectural and aesthetic significance for their landscape values. The different species of trees were chosen by Reserves Superintendent Maurice

Barnett for their suitability for Papanui soils. The trees create a strong aesthetic for the 16 streets due to their scale, colour, texture and seasonal change. This varies street by street due to the different species planted. Bronze plaques with the inscription 'Papanui Memorial Avenue to the fallen 1939-1945' hung from simple metal brackets mark the beginning and in some cases each end of the avenues.

The Papanui War Memorial Avenues are of technological and craftsmanship significance for the range of different species of trees that are represented in the streets, specifically chosen for their physical characteristics and the soils in the area. There is also technological value evident in the planting and maintenance methods and techniques used.

The Papanui War Memorial Avenues are of high contextual significance for the groups of tree species planted in each individual street, and for the relationship of the 16 streets to one another in terms of their proximity and similarities. The streets, plaques and trees contribute to the unique identity of this part of Papanui, and are recognised local landmarks. The memorial avenues also relate to the range of housing types within the streets, some of which are consistently characteristic of a particular age and style.

The Papanui War Memorial Avenues are of archaeological and scientific significance for the potential to provide archaeological evidence relating to past landscaping methods and materials, and human activity on the site.

References – Christchurch City Council Heritage Files

REPORT DATED: 10 JUNE 2022

Our proposed Housing and Business Choice and Heritage Plan Changes (13 &14)

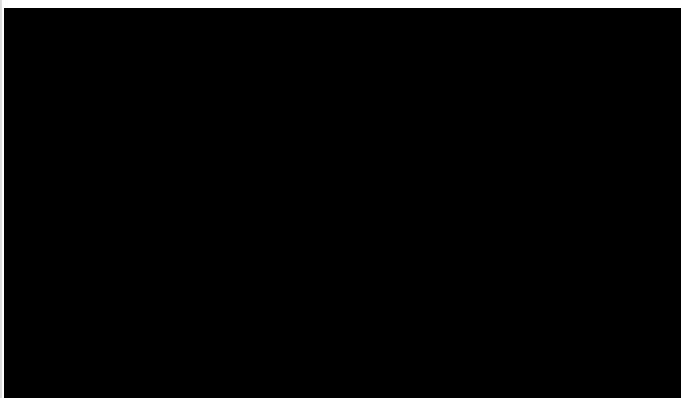
Submitter Details

Submission Date: 12/05/2023

First name: Luke **Last name:** Hinchey

Organisation: Ryman Healthcare Limited

Preferred method of contact Email



I could not
Gain an advantage in trade competition through this submission

I am not
directly affected by an effect of the subject matter of the submission that :
a. adversely affects the environment, and
b. does not relate to the trade competition or the effects of trade competitions.

Note to person making submission:

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991

Would you like to present your submission in person at a hearing?

- ☒ Yes
- ☐ I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Additional requirements for hearing:

Consultation Document Submissions

Original Submitter:

Original Point:

Points: 49.1

☒ Support

- ☐ Oppose
- ☒ Seek Amendment

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area

Please see attached submission on Plan Change 14.

My submission is that

Please see attached submission on Plan Change 14.

Attached Documents

File
Ryman Healthcare Limited - PC13 and PC14 submission



Form 5

SUBMISSION ON PUBLICLY NOTIFIED PROPOSAL FOR POLICY STATEMENT OR PLAN, CHANGE OR VARIATION

Clause 6 of Schedule 1, Resource Management Act 1991

To: Christchurch City Council (*Council*)

Name of submitter: Ryman Healthcare Limited (*Ryman*)

Introduction

- 1 This is a submission on Council's proposed amendments to the Christchurch District Plan (*District Plan*):
 - 1.1 Proposed Plan Change 13: Heritage; and
 - 1.2 Proposed Plan Change 14: Housing and Business Choice.
- 2 Ryman could not gain an advantage in trade competition through this submission.
- 3 Ryman supports in full the Retirement Villages Association of New Zealand Incorporated (*RVA*) submission on PC14. This submission provides additional context to Ryman's villages and its interest in the proposals.
- 4 The submission covers:
 - 4.1 An introduction to Ryman, its villages and its residents; and
 - 4.2 Ryman's position on PC13 and PC14.

Ryman's approach

- 5 Ryman is considered to be a pioneer in many aspects of the healthcare industry – including retirement village design, standards of care, and staff education. It believes that a quality site, living environment, amenities and the best care maximises the quality of life for our residents. Ryman is passionately committed to providing the best environment and care for our residents. Ryman is not a developer. It is a resident-focused operator of retirement villages. Ryman has a long term interest in its villages and its residents.

The ageing demographic

- 6 Christchurch City's growing ageing population and the increasing demand for retirement villages is addressed in the *RVA*'s submission on PC14, and that is adopted by Ryman.
- 7 Ryman's own research confirms that good quality housing and sophisticated care for the older population is significantly undersupplied in many parts of the country, including Christchurch City. Christchurch City's ageing population is facing a significant shortage in appropriate accommodation and care options, which allow them to "age in place" as their health and lifestyle requirements change over time. This is because appropriate sites in good locations are incredibly scarce.

Ryman's scale in Christchurch City's retirement market

- 8 Ryman is the largest provider of retirement village accommodation in New Zealand. Ryman currently has 38 operational retirement villages throughout New Zealand providing homes for more than 11,000 elderly residents. It has 8 retirement villages currently operating or at some stage of detailed design or construction in Christchurch City. Ryman was also recently granted consents for a further village on Park Terrace.
- 9 Ryman constructs a significant number of new housing units in Christchurch City each year, and in the wider region. In the last 6 years, it has obtained resource consents to build and operate 3 large villages at Northwood, Riccarton Racecourse and Park Terrace, which are now under construction or nearing construction.
- 10 Collectively, these villages comprise around 420 new retirement units and 384 new aged care units. Ryman's contribution to Christchurch City's growth in a 6 year period is accommodation for in the order of 915 people.
- 11 In that sense, Ryman builds a substantial portion of all new retirement village units. We expect to continue to increase our proportion of Christchurch City's new build retirement villages over time.

Ryman's residents

- 12 All of Ryman's residents – both retirement and aged care residents – are much less active and mobile than the 65+ population generally as well as the wider population. Ryman's retirement residents are generally early 80s on move-in and its aged care residents are mid-late 80s on move-in. Across all of Ryman's villages, the average age of retirement residents is 82.1 years and the average age of aged care residents is 86.7 years.

Ryman villages' amenities and layout needs

- 13 To provide for the specific needs of its residents, Ryman provides extensive on-site community amenities, including entertainment activities, recreational amenities, small shops, bar and restaurant amenities, communal sitting areas, and large, attractively landscaped areas.
- 14 Because of the comprehensive care nature of Ryman's villages, all of the communal amenities and care rooms need to be located in the Village Centre to allow for safe and convenient access between these areas. This operational requirement results in a density and layout that differs from a typical residential development. However, Ryman's retirement villages are integrated developments, which often creates opportunities to achieve higher quality residential outcomes compared to typical residential developments.

Ryman's position on Plan Change 13

- 15 Ryman has a particular interest in how PC13 applies to its site at 100-104 Park Terrace and 20 Dorset Street, and 78 Park Terrace (*Park Terrace site*).
- 16 Ryman designed its recently consented Park Terrace site to incorporate the existing onsite Heritage Item and Heritage Setting into its village proposal. As a result Ryman seeks to ensure that the amendments to the controls under PC13 do not conflict with the consented proposal, and that any provisions applying to the Park Terrace site are not more restrictive than the operative District Plan.

Ryman's position on PC14

- 17 Ryman adopts the RVA's submission on PC14. In addition, Ryman wishes to emphasise that PC14 will have a significant impact on the provision of housing and care for Christchurch City's growing ageing population. Based on its experience of consenting multiple villages

under the Operative District Plan, there is a real risk that the proposed changes will delay necessary retirement and aged care accommodation in the region.

- 18 Further, Ryman has a particular interest in how PC14 applies to two of its sites at:

18.1 20 Radcliffe Road, Northwood (*Northwood site*); and

18.2 The Park Terrace site.

Ryman's Northwood site

- 19 Ryman was recently granted resource consent for stage 1 of its proposed Northwood retirement village. PC14 proposes to rezone the Northwood site from Commercial Core Zone to Town Centre Zone (TCZ). Ryman opposes this rezoning and seeks that the site is rezoned to High Density Residential (HRZ), providing the provisions applicable to the HRZ are amended to better enable retirement villages as outlined in the RVA submission.
- 20 Ryman's Northwood site occupies the entirety of the area currently zoned TCZ. It also understands that the land is no longer needed for long term commercial purposes. Ryman therefore submits it is no longer logical to retain a commercial zoning for the site. It submits this outcome is more aligned with the intent of the Enabling Housing Act and the National Policy Statement on Urban Development 2020, by appropriately providing for a residential activity that is planned to provide housing for Christchurch City's rapidly growing ageing population.
- 21 As a result of its submission on PC14, Ryman also seeks the removal of the Town Centre Zone (Belfast Northwood) Outline Development Plan (Appendix 15.15.1) (ODP), and the associated policy and rules. As outlined above, the site is now partially consented for a Ryman village. Ryman submits that the expected land use for the site has now changed significantly since the ODP was prepared, which at the time provided for a commercial centre and associated services. Given Ryman's ownership of the entire site, the ODP now has limited relevance to the planned activities.

Ryman's Park Terrace site

- 22 Ryman was recently granted resource consent for a comprehensive retirement village on Park Terrace. As part of the Christchurch Replacement Plan process, the Independent Hearings Panel determined a height limit of 20 metres for 78 Park Terrace. The Panel accepted this height limit on the basis of the detailed evidence provided by Ryman.¹
- 23 PC14 proposes to rezone the Park Terrace Site to HDZ. Ryman submits that the built form standard inserted by PC14 should carry over the height limit approved for the Park Terrace site through the Replacement Plan process. The Park Terrace site has now been consented and designed with 20m height limits in mind, and with the expectation that a 20m height limit would apply going forward (particularly for alterations).

¹ As recorded in *Decision 43-Central City – States 2 and 3* of the Independent Hearing Panel for the Christchurch Replacement District Plan, at [256-270].

Decisions sought

- 24 In relation to Plan Change 13, Ryman seeks the following decision:
- 24.1 Relief consistent with the existing land use as a consented retirement village at the Park Terrace Site and no more restrictive than the operative District Plan.
- 25 In relation to Plan Change 14, Ryman seeks the following decisions:
- 25.1 The decisions sought by the RVA in its submission on PC14;
- 25.2 The rezoning of the Northwood site, and the deletion of both the Town Centre Zone (Belfast Northwood) Outline Development Plan, and all related policies and rules (including Policy 15.2.2.2 and Rules 15.4.3, 15.4.3.1 (including all sub-rules) and 15.4.3.2 (including all sub-rules)), as set out at paragraphs 19-21 above; and
- 25.3 The following amendments to Built form standard 14.6.2.1, to address the matters outlined at paragraphs 22-23 above, and any consequential amendments necessary to other height provisions to ensure Rule 14.15.3 (Impacts on neighbouring property) does not apply unless the 20m height limited is exceeded on the listed sites:

14.6.2.1 Building Height

- a) Buildings must not exceed 14 metres in height above ground level. The maximum height of any building does not apply to the following land where a maximum building height of 20 metres shall apply to buildings for a retirement village:
- i. Lot 1 DP 77997 CT CB46D/74;
 - ii. Town Section 118 DP 3780; and
 - iii. iii. Town Section 119 DP 3780.
- 26 Ryman wishes to be heard in support of this submission.
- 27 If others make a similar submission, Ryman will consider presenting a joint case with them at a hearing.

Matthew Brown

NZ Development Manager
Ryman Healthcare Limited

Address for service of submitter:
Ryman Healthcare Limited
c/- Luke Hinchey
Chapman Tripp

Details of submitter No: 1069 - Keri Whaitiri

Submitter:	Keri Whaitiri
Submitter Address:	[REDACTED]
Behalf of:	Te Rito Trust & Malcolm Hattaway

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 12/05/2023

First name: Keri

Last name: Whaitiri

On behalf of:

Postal address:

Email:

Daytime Phone:

Would you like to present your submission in person at a hearing?

Yes

Additional requirements for hearing:

Consultation Document Submissions

Provision: Chapter 9 Natural and Cultural Heritage

Oppose

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

That the full implications of the new 'Residential Heritage Areas' are disclosed and that these do not exceed the current provisions of the 'Residential Character Areas'.

That 'Defining' and 'Contributory' categories in Residential Heritage Areas are removed completely from the proposed new Policy Changes.

My submission is that:

The Heritage Team of CCC have, yet again, sought to take advantage of their position and impose self-serving policy on owners of old houses in old suburbs.

The proposed CCC Heritage Policy Changes 13 and 14 seek to not only sidestep the requirements of the National Policy Statement Urban Development by applying 'Qualifying Matters' to proposed new 'Residential Heritage Areas', they also seek to bring in categorisation of non-heritage listed properties by including them as 'contributory' or 'defining'. This new heritage categorisation effectively extends the pool of heritage properties that sit under the discretion and authority of the CCC Heritage Team, thereby further substantiating their own existence. This categorisation is unnecessary and contrary to the purpose of the NPS-UD.

The fact that these 'contributory' or 'defining' properties are only shown in 'hard-copy' Policy Change documents, but not in online interactive digital maps, is highly misleading. It is an indicator of policy that has been poorly considered. It could result in a number of property owners not being aware of the effect the proposed Policy Changes might have on their non-listed property. Owners that this applies to have not been properly consulted, notified nor given the courtesy of actually knowing that their property is affected

within PC13 and PC14, if they have relied on the interactive digital maps to inform them.

There is little indication of the difference between the proposed new 'Residential Heritage Areas' and existing 'Residential Character Areas'. Nor is there clear information of the purpose of the new moniker and the actual regulatory requirements that all property owners within it will be subject to. The purpose and effects of PC13 and PC14 have been poorly communicated.

Furthermore, the elevation of colonial heritage values in this day and age comes from a position of privilege and bias. It undermines the intended bicultural roots of NZ society and perpetuates one ideological system that has been enshrined in physical fabric, over intangible values that have been subjugated and erased over the past 170 years.

The NPS-UD 2020 serves a particular purpose - it is to secure sufficient development capacity for new housing. This is to counteract the housing crisis and open up opportunity for more people to have the benefit of living close to urban amenities, making 'good' areas for living more accessible to a larger part of society.

One could argue that in perpetuating the notion of 'Residential Heritage Areas' based on colonial heritage values that a Local Government Authority is limiting opportunities for future expression with building stock that departs from the colonial status quo. The idea that existing Heritage Items are subject to current restrictions, regulatory requirements and protections is valid. The notion that new categorisations of 'contributory' and 'defining' properties is an appropriate response to the NPS-UD is not valid. The purpose of the wording change from 'Residential Character Area' to 'Residential Heritage Area' is unclear. One would hope that the proposed Policy Changes were a useful step in tipping the balance of housing affordability (an aspiration that is increasingly beyond the grasp of most young NZers) as opposed to protecting the privilege of older generations.

By applying 'Qualifying Matters' to proposed new 'Residential Heritage Areas' CCC subverts a National Policy that is aimed at greater access to housing stock and proposes changes that seem to effectively increase colonial heritage protection and restrictions on development. This is in conflict with the intention of the National Policy Statement Urban Development 2020.

Details of submitter No: 1070 - Danny Whiting

Submitter:	Danny Whiting
Submitter Address:	<div></div>


Our proposed Heritage Plan Change (PC13)

[Submitter Details](#)**Submission Date:** 17/05/2023**First name:** Danny**Last name:** Whiting**Postal address:****Email:****Daytime Phone:****Would you like to present your submission in person at a hearing?**

Yes

Additional requirements for hearing:

Attached Documents

Name
PC13 submission Danny Whiting 

Form 5

SUBMISSION ON PUBLICLY NOTIFIED PROPOSAL FOR POLICY STATEMENT OR PLAN, CHANGE OR VARIATION*Clause 6 of Schedule 1, Resource Management Act 1991***To** Christchurch City Council**Name of submitter:** Danny Whiting (**D Whiting**)

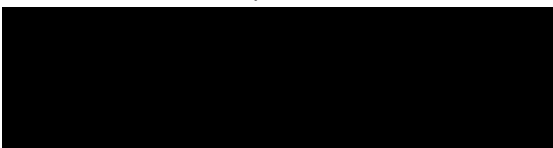
- 1 This is a submission on Plan Change 13 (**PC13**) to the Christchurch District Plan (the **Plan**).
- 2 D Whiting could not gain an advantage in trade competition through this submission.
- 3 D Whiting's submission relates to PC13 in its entirety.
- 4 D Whiting seeks the following decision from the local authority:
 - 4.1 The relief as set out in **Annexure A**.
 - 4.2 Any other similar relief that would address the relief sought by D Whiting.
 - 4.3 All necessary consequential amendments.
- 5 **D Whiting wishes to be heard** in support of the submission.
- 6 If others make a similar submission, **D Whiting** will consider presenting a joint case with them at a hearing.

Signed for and on behalf of Danny Whiting

pp. D Whiting
12 May 2023

Address for service of submitter:

Danny Whiting
c/- Novo Group Limited
Attention: J Phillips



ANNEXURE A

The drafting suggested in this annexure reflects the key changes the submitter seeks. Consequential amendment may also be necessary to other parts of the proposed provisions.

The submitter proposes drafting below and seeks that this drafting, or drafting with materially similar effect, be adopted by the Council.

Suggested amendments and alternative drafting is shown in track change –requested deletions are shown using ~~red strike through~~ and requested insertions are shown using red underline.

No.	Provision	Position	Submission	Relief Sought
1.	Appendix 9.3.7.2 Schedule of Significant Historic Heritage Items (27 Glandovey Road)	Oppose	<p>The submitter opposes the spatial extent of the heritage setting 423 for heritage item 209 (27 Glandovey Road), insofar that this extends to include the properties at 7 and 9 Thornycroft Street.</p> <p>The properties at 7 and 9 Thornycroft Street have no physical relationship to 27 Glandovey Road, are in separate ownership and to the extent that there is any historical relationship or heritage value of these sites to the original estate of 27 Glandovey Road, the costs and regulation imposed by the heritage setting are not justified.</p>	Reduce the spatial extent of the heritage setting 423 (for heritage item 209 at 27 Glandovey Road) so as to exclude 7 and 9 Thornycroft Street.
2.	Revisions to historic heritage rules generally	Oppose	<p>The submitter is opposed to PC13 to the extent that it proposes to amend the historic heritage rules in the Plan in such a way that will be less enabling and/or will result in greater regulation or resource consent requirements for development requirements.</p> <p>The submitter is particularly concerned with proposed amendments to definitions, policies, rules, and assessment matters where such amendments will be inconsistent with:</p>	Delete/reject proposed amendments to definitions, policies, rules and assessment matters in PC13 and retain the status quo in respect of these provisions.

No.	Provision	Position	Submission	Relief Sought
			<ul style="list-style-type: none"> • strategic objective 3.3.1 to 'foster investment certainty'; and, • strategic objective 3.3.2 to '<i>minimise</i>: A. <i>transaction costs and reliance on resource consent processes</i>; and B. <i>the number, extent, and prescriptiveness of development controls and design standards in the rules, in order to encourage innovation and choice</i>; and C. <i>the requirements for notification and written approval...</i>'; and • heritage objective 9.3.2.1.1 to <i>enable and support</i>: 'A. <i>the ongoing retention, use and adaptive re-use</i>; and B. <i>the maintenance, repair, upgrade, restoration and reconstruction</i>; of historic heritage' 	

Details of submitter No: 1071 - Richard Peebles

Submitter:	Richard Peebles
Submitter Address:	
Organisation:	Peebles Group Limited

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 17/05/2023

First name: Richard

Last name: Pebbles

Organisation:

Postal address:

Email:


Daytime Phone:

Would you like to present your submission in person at a hearing?

Yes

Additional requirements for hearing:

Attached Documents

Name	
PC13 submission Pebbles Group Limited	

Form 5

SUBMISSION ON PUBLICLY NOTIFIED PROPOSAL FOR POLICY STATEMENT OR PLAN, CHANGE OR VARIATION*Clause 6 of Schedule 1, Resource Management Act 1991***To** Christchurch City Council**Name of submitter:** Peebles Group Limited (**Peebles Group**)

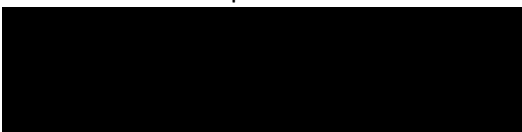
- 1 This is a submission on Plan Change 13 (**PC13**) to the Christchurch District Plan (the **Plan**).
- 2 Peebles Group could not gain an advantage in trade competition through this submission.
- 3 Peebles Group's submission relates to PC13 in its entirety.
- 4 Peebles Group seeks the following decision from the local authority:
 - 4.1 The relief as set out in **Annexure A**.
 - 4.2 Any other similar relief that would address the relief sought by Peebles Group.
 - 4.3 All necessary consequential amendments.
- 5 **Peebles Group wishes to be heard** in support of the submission.
- 6 If others make a similar submission, **Peebles Group** will consider presenting a joint case with them at a hearing.

Signed for and on behalf of Peebles Group Limited

pp. R Peebles
12 May 2023

Address for service of submitter:

Peebles Group Limited
c/- Novo Group Limited
Attention: J Phillips



ANNEXURE A

The drafting suggested in this annexure reflects the key changes the submitter seeks. Consequential amendment may also be necessary to other parts of the proposed provisions.

The submitter proposes drafting below and seeks that this drafting, or drafting with materially similar effect, be adopted by the Council.

Suggested amendments and alternative drafting is shown in track change –requested deletions are shown using ~~red strike through~~ and requested insertions are shown using red underline.

No.	Provision	Position	Submission	Relief Sought
1.	Revisions to historic heritage rules generally	Oppose	<p>The submitter is opposed to PC13 to the extent that it proposes to amend the historic heritage rules in the Plan in such a way that will be less enabling and/or will result in greater regulation or resource consent requirements for development requirements.</p> <p>The submitter is particularly concerned with proposed amendments to definitions, policies, rules, and assessment matters where such amendments will be inconsistent with:</p> <ul style="list-style-type: none"> • strategic objective 3.3.1 to ‘foster investment certainty’; and, • strategic objective 3.3.2 to <u>‘minimise: A. transaction costs and reliance on resource consent processes; and B. the number, extent, and prescriptiveness of development controls and design standards in the rules, in order to encourage innovation and choice; and C. the requirements for notification and written approval...’</u>; and • heritage objective 9.3.2.1.1 to <u>enable and support: ‘A. the ongoing retention, use and adaptive re-use; and B. the maintenance, repair, upgrade, restoration and reconstruction; of historic heritage’</u> 	Delete/reject proposed amendments to definitions, policies, rules and assessment matters in PC13 and retain the status quo in respect of these provisions.

Details of submitter No: 1072 - Richard and Suzanne Peebles

Submitter:	Richard and Suzanne Peebles
Submitter Address:	
Behalf of:	R&S Peebles

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 17/05/2023

First name: Richard and Suzanne Peebles

Last name: Peebles

On behalf of: R & S Peeble

Postal address:

Email:


Daytime Phone:

Would you like to present your submission in person at a hearing?

Yes

Additional requirements for hearing:

Attached Documents

Name	
PC13 submission Richard and Suzanne Peebles	

Form 5

SUBMISSION ON PUBLICLY NOTIFIED PROPOSAL FOR POLICY STATEMENT OR PLAN, CHANGE OR VARIATION*Clause 6 of Schedule 1, Resource Management Act 1991***To** Christchurch City Council**Name of submitter:** Richard and Suzanne Peebles (**R & S Peebles**)

- 1 This is a submission on Plan Change 13 (**PC13**) to the Christchurch District Plan (the **Plan**).
- 2 R & S Peebles could not gain an advantage in trade competition through this submission.
- 3 R & S Peebles's submission relates to PC13 in its entirety.
- 4 R & S Peebles seeks the following decision from the local authority:
 - 4.1 The relief as set out in **Annexure A**.
 - 4.2 Any other similar relief that would address the relief sought by R & S Peebles.
 - 4.3 All necessary consequential amendments.
- 5 **R & S Peebles wishes to be heard** in support of the submission.
- 6 If others make a similar submission, **R & S Peebles** will consider presenting a joint case with them at a hearing.

Signed for and on behalf of Richard and Suzanne Peebles


pp. R & S Peebles
12 May 2023

Address for service of submitter:

Richard and Suzanne Peebles
c/- Novo Group Limited
Attention: J Phillips



ANNEXURE A

The drafting suggested in this annexure reflects the key changes the submitter seeks. Consequential amendment may also be necessary to other parts of the proposed provisions.

The submitter proposes drafting below and seeks that this drafting, or drafting with materially similar effect, be adopted by the Council.

Suggested amendments and alternative drafting is shown in track change –requested deletions are shown using ~~red strike through~~ and requested insertions are shown using red underline.

No.	Provision	Position	Submission	Relief Sought
1.	Appendix 9.3.7.2 Schedule of Significant Historic Heritage Items (27 Glandovey Road)	Oppose	<p>The submitter opposes the spatial extent of the heritage setting 423 for heritage item 209 (27 Glandovey Road), insofar that this extends to include the properties at 7 and 9 Thornycroft Street.</p> <p>The properties at 7 and 9 Thornycroft Street have no physical relationship to 27 Glandovey Road, are in separate ownership and to the extent that there is any historical relationship or heritage value of these sites to the original estate of 27 Glandovey Road, the costs and regulation imposed by the heritage setting are not justified.</p>	Reduce the spatial extent of the heritage setting 423 (for heritage item 209 at 27 Glandovey Road) so as to exclude 7 and 9 Thornycroft Street.
2.	Revisions to historic heritage rules generally	Oppose	<p>The submitter is opposed to PC13 to the extent that it proposes to amend the historic heritage rules in the Plan in such a way that will be less enabling and/or will result in greater regulation or resource consent requirements for development requirements.</p> <p>The submitter is particularly concerned with proposed amendments to definitions, policies, rules, and assessment matters where such amendments will be inconsistent with:</p>	Delete/reject proposed amendments to definitions, policies, rules and assessment matters in PC13 and retain the status quo in respect of these provisions.

No.	Provision	Position	Submission	Relief Sought
			<ul style="list-style-type: none"> • strategic objective 3.3.1 to 'foster investment certainty'; and, • strategic objective 3.3.2 to '<u>minimise</u>: A. transaction costs and reliance on resource consent processes; and B. the number, extent, and prescriptiveness of development controls and design standards in the rules, in order to encourage innovation and choice; and C. the requirements for notification and written approval...'; and • heritage objective 9.3.2.1.1 to <u>enable and support</u>: 'A. the ongoing retention, use and adaptive re-use; and B. the maintenance, repair, upgrade, restoration and reconstruction; of historic heritage' 	

Details of submitter No: 1073 - Richard Peebles

Submitter:	Richard Peebles
Submitter Address:	
Organisation:	181 High Limited
Behalf of:	172 High

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 17/05/2023

First name: Richard

Last name: Pebbles

Organisation: 181 High Limited

Postal address:

Email:


Daytime Phone:

Would you like to present your submission in person at a hearing?

Yes

Additional requirements for hearing:

Attached Documents

Name	
PC13 submission 181 High Limited	

Form 5

SUBMISSION ON PUBLICLY NOTIFIED PROPOSAL FOR POLICY STATEMENT OR PLAN, CHANGE OR VARIATION

*Clause 6 of Schedule 1, Resource Management Act 1991***To** Christchurch City Council**Name of submitter:** 181 High Limited (**181 High**)

- 1 This is a submission on Plan Change 13 (**PC13**) to the Christchurch District Plan (the **Plan**).
- 2 181 High could not gain an advantage in trade competition through this submission.
- 3 181 High's submission relates to PC13 in its entirety.
- 4 181 High seeks the following decision from the local authority:
 - 4.1 The relief as set out in **Annexure A**.
 - 4.2 Any other similar relief that would address the relief sought by 181 High.
 - 4.3 All necessary consequential amendments.
- 5 **181 High wishes to be heard** in support of the submission.
- 6 If others make a similar submission, **181 High** will consider presenting a joint case with them at a hearing.

Signed for and on behalf of 181 High Limited


pp. R Peebles
12 May 2023

Address for service of submitter:

181 High Limited
c/- Novo Group Limited
Attention: J Phillips



ANNEXURE A

The drafting suggested in this annexure reflects the key changes the submitter seeks. Consequential amendment may also be necessary to other parts of the proposed provisions.

The submitter proposes drafting below and seeks that this drafting, or drafting with materially similar effect, be adopted by the Council.

Suggested amendments and alternative drafting is shown in track change –requested deletions are shown using ~~red strike through~~ and requested insertions are shown using red underline.

No.	Provision	Position	Submission	Relief Sought
1.	Heritage items and settings aerial map (Aerial map reference 693, Heritage item number 1313, heritage setting number 555)	Oppose	The submitter opposes the spatial extent of the heritage setting proposed (for the former AJ Whites building facade) on Aerial map reference 693 for heritage item number 1313. The heritage setting extends well beyond the extent of the listed façade and unnecessarily constrains the modern and recently developed buildings within the setting. Among other reasons, the submitter is concerned at the costs and regulation imposed by the change relative to the benefits of the change.	Reduce the spatial extent of the heritage setting 555 as proposed on Aerial map reference 693, for Heritage item number 1313 so that it is coincidental to the extent of the heritage item.
2.	Revisions to historic heritage rules generally	Oppose	<p>The submitter is opposed to PC13 to the extent that it proposes to amend the historic heritage rules in the Plan in such a way that will be less enabling and/or will result in greater regulation or resource consent requirements for development requirements.</p> <p>The submitter is particularly concerned with proposed amendments to definitions, policies, rules, and assessment matters where such amendments will be inconsistent with:</p> <ul style="list-style-type: none"> • strategic objective 3.3.1 to ‘foster investment certainty’; and, 	Delete/reject proposed amendments to definitions, policies, rules and assessment matters in PC13 and retain the status quo in respect of these provisions.

No.	Provision	Position	Submission	Relief Sought
			<ul style="list-style-type: none"> • strategic objective 3.3.2 to '<u>minimise</u>: A. transaction costs and reliance on resource consent processes; and B. the number, extent, and prescriptiveness of development controls and design standards in the rules, in order to encourage innovation and choice; and C. the requirements for notification and written approval...'; and • heritage objective 9.3.2.1.1 to <u>enable and support</u>: 'A. the ongoing retention, use and adaptive re-use; and B. the maintenance, repair, upgrade, restoration and reconstruction; of historic heritage' 	

Details of submitter No: 857 - Bruce Neill Alexander

Submitter:	Bruce Neill Alexander
Submitter Address:	

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 16/05/2023

First name: Bruce Neill

Last name: Alexander

Preferred method of contact Email

Postal address:

Email:

Daytime Phone:

Would you like to present your submission in person at a hearing?

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Person of interest declaration: I am *

Explain the grounds for saying you come within category (a) or (b) above:

Note to person making further submission:

- A further submission can only support or oppose an original submission listed in the summary. It is not an opportunity to make a fresh submission on matters not raised in the submission.
- A copy of your further submission must be served on the original submitter within 5 working days of making the further submission to the Council

Attached Documents

Name

Bruce Alexander submission chch heritage plan 13 

Have your say

Housing and Business Choice Plan Change 14 and Heritage Plan Change 13

Clause 6 of Schedule 1 Resource Management Act 1991

Before we get started we'd like to ask a few questions about you. This helps us better understand who we are hearing from.

Gender: ☒ Male ☐ Female ☐ Non-binary/another gender

Age: ☐ Under 18 years ☐ 18-24 years ☐ 25-34 years ☐ 35-49 years ☐ 50-64 years
☐ 65-79 years ☒ over 80 years

Ethnicity: ☒ New Zealand European ☐ Māori ☐ Pacific Peoples ☐ Asian
☐ Middle Eastern/Latin American/African ☐ Other European ☐ Other

** Required information*

Name* Bruce Neill Alexander

Address* [REDACTED] Postcode* [REDACTED]

Email [REDACTED] Phone no. [REDACTED]

If you are responding on behalf of a recognised organisation, please provide:

Organisation's name

Your role

Trade competition and adverse effects* (select appropriate)

☐ I could / ☐ could not gain an advantage in trade competition through this submission.

If you are a person who could gain an advantage in trade competition through this submission, are you directly affected by an effect of the proposed plan change/part of the plan change that –

(a) adversely affects the environment, and

(b) does not relate to the trade competition or the effects of trade competition?

Yes ☐ No ☒

* A person who could gain an advantage in trade competition through the submission may make a submission only if you answered Yes to the above, as per clause 6(4) of Schedule 1 of the Resource Management Act 1991.

Please indicate by ticking the relevant box whether you wish to be heard in support of your submission*

☐ I wish to speak in support of my submission on Plan Change 13

☐ I wish to speak in support of my submission on Plan Change 14

☒ I do not wish to speak.

Joint submissions (Please tick this box if you agree)

☐ If others make a similar submission, I will consider presenting a joint case with them at the hearing.

If you have used extra sheets for this submission, please attach them to this form and indicate below*

☐ Yes, I have attached extra sheets. ☒ No, I have not attached extra sheets.

Signature of submitter (or person authorised to sign on behalf of submitter)

A signature is not required if you make your submission by electronic means.

Signature Bruce Neill Alexander Date 12 May 2023 ✓

Have your say

Heritage Plan Change 13

The specific provisions of the plan change that my submission relates to are as follows:*

(Please continue on separate sheet(s) if necessary.)

Chapter 9 - Natural and Cultural Heritage

I would like to have 111 Hackthorne Road for inclusion in the heritage schedule due to its age and history

My submission is that:*

(You should clearly state whether you support or oppose the specific proposed provisions or wish to have them amended. You should also state the reasons for your views. Please continue on separate sheet(s) if necessary.)

I would like to have my house included in the heritage schedule for the following reasons:

It was built in 1910 as a weekend holiday cottage, this was the first house built on Hackthorne Road. It is made of kauri weatherboard and heart rimu construction.

It has only had two owners in that time. I have been living here for 52 years since i bought it in 1970

It survived the 2011 earthquake without minimal (\$60,000) damage, mainly plaster

Extensive alterations have been made over the years.

I seek the following decision from the Council:*

(Please give precise details stating what amendments you wish to see made to the proposed Plan Change. Please continue on separate sheet(s) if necessary.)

Please include 111 Hackthorne Road in the heritage schedule according to Chapter 9 Natural and Cultural Heritage

Details of submitter No: 870 - Susanne Antill

Submitter:	Susanne Antill
Submitter Address:	

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 16/05/2023

First name: Susanne

Last name: Antill

Preferred method of contact Email

Postal address:

Email:

Daytime Phone:

Would you like to present your submission in person at a hearing?

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Person of interest declaration: I am

*

Explain the grounds for saying you come within category (a) or (b) above:

Note to person making further submission:

- A further submission can only support or oppose an original submission listed in the summary. It is not an opportunity to make a fresh submission on matters not raised in the submission.
- A copy of your further submission must be served on the original submitter within 5 working days of making the further submission to the Council

Consultation Document Submissions

Provision: Chapter 14 Residential

Oppose

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

My submission is that:

We totally oppose the new planning rules in the Christchurch District Plan.

These proposals would substantially alter the character of Christchurch for residents of Christchurch and detrimentally affect our quality of life.

It reflects a top down management by a foreigner with globalist allegiances.

The general wording is non specific platitudes. It could mean anything.

1. We oppose replacing existing residential zones in the city with two new ones – a medium density zone and a high density zone.

What rationale? Are you planning for massive overseas population immigration into Christchurch for a 15 minute smart city when the birth rate of Christchurch residents is low, particularly after the mandated experimental, untested jabs on young New Zealanders which has probably sterilized

many of them.

2. We oppose increased height limits of buildings. Christchurch is on an aquifer flood plane and subject to earthquakes. This is totally crazy.

3. What does this sentence mean: “ Special rules for housing and business to better reflect our city’s environment and climate”?

4. What does this sentence mean:” Heritage that should be protected, with a number of new buildings, items and interiors added to the Schedule of Significant Historic Heritage.”?

This does not make sense.

Are you trying to pull a fast one? And are you going to destroy anything that you do not deem to be of historical significance? Will you destroy the character of Christchurch the way you deconstructed and destroyed the Christchurch Library?

There is no mention here of 5G.

We totally oppose denser housing which will actually cut sunlight from residences.

We oppose 15 minute cities which will curtail our freedom

We oppose smart cities which will be detrimental to our health

We oppose 5G towers which pose a significant threat to both our freedom and our health

We oppose mass overseas immigration into Christchurch which is a globalist agenda not a Christchurch citizens agenda.

This council does not listen to what residents want and runs rough shod over the opinions and wishes of Christchurch residents. For example the Harewood Road Cycleway which was opposed by the majority of Harewood residents.

Susanne Antill

Janice Antill

Details of submitter No: 1074 - James David Bundy

Submitter:	James David Bundy
Submitter Address:	[REDACTED]
Behalf of:	Governors Bay Heritage Trust

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 18/05/2023

First name: James David

Last name: Bundy



Postal address:

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Would you like to present your submission in person at a hearing?

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Attached Documents

Name	
Heather Bundy Email	
Heritage Plan Change 13 Submission	

Jackson, Andrew

From: Heather Bundy <[REDACTED]>
Sent: Friday, 12 May 2023 4:37 pm
To: Engagement; Heather Bundy
Subject: Submission Heritage Plan Change 13: Burnside Stable and Lockup at Allandale
Attachments: Heritage Plan Change 13 Submission.pdf

Good Afternoon

Please find attached a submission to have 2 heritage buildings scheduled in the District Plan

Regards

David Bundy

Trustee Governors Bay Heritage Trust



Virus-free. www.avg.com

Have your say

**Housing and Business Choice Plan Change 14
and Heritage Plan Change 13**

Clause 6 of Schedule 1 Resource Management Act 1991

Before we get started we'd like to ask a few questions about you. This helps us better understand who we are hearing from.

Gender: ☒ Male ☐ Female ☐ Non-binary/another gender

Age: ☐ Under 18 years ☐ 18-24 years ☐ 25-34 years ☐ 35-49 years ☐ 50-64 years
☒ 65-79 years ☐ over 80 years

Ethnicity: ☒ New Zealand European ☐ Māori ☐ Pacific Peoples ☐ Asian
☐ Middle Eastern/Latin American/African ☐ Other European ☐ Other

*** Required information**

Name*

James David Bundu

Address*

Email

If you are responding on behalf of a recognised organisation, please provide:

Organisation's name

Governors Bay Heritage Trust.

Your role

Trustee.

Trade competition and adverse effects* (select appropriate)

☐ I could / ☒ could not gain an advantage in trade competition through this submission.

If you are a person who could gain an advantage in trade competition through this submission, are you directly affected by an effect of the proposed plan change/part of the plan change that –

(a) adversely affects the environment, and

(b) does not relate to the trade competition or the effects of trade competition?

☐ Yes ☒ No

* A person who could gain an advantage in trade competition through the submission may make a submission only if you answered Yes to the above, as per clause 6(4) of Schedule 1 of the Resource Management Act 1991.

Please indicate by ticking the relevant box whether you wish to be heard in support of your submission*☐ I wish to speak in support of my submission on Plan Change 13☐ I wish to speak in support of my submission on Plan Change 14☒ I do not wish to speak.**Joint submissions (Please tick this box if you agree)**☐ If others make a similar submission, I will consider presenting a joint case with them at the hearing.

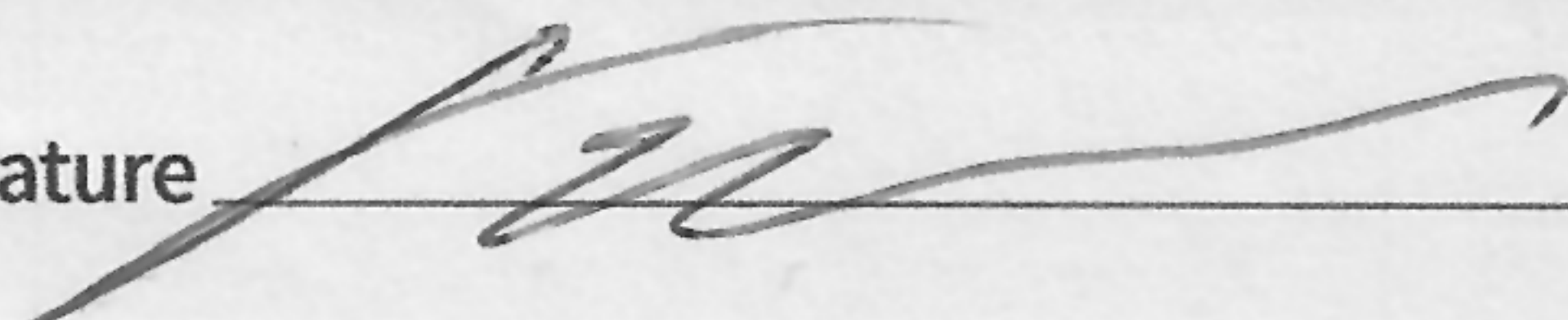
If you have used extra sheets for this submission, please attach them to this form and indicate below*

☐ Yes, I have attached extra sheets.☒ No, I have not attached extra sheets.

Signature of submitter (or person authorised to sign on behalf of submitter)

A signature is not required if you make your submission by electronic means.

Signature



Date

17th May 2023

3:45 pm

Have your say

Heritage Plan Change 13

Housing and Business Choice Plan Change 14

The specific provisions of the plan change that my submission relates to are as follows:*

(Please continue on separate sheet(s) if necessary.)

Two heritage buildings to be scheduled
in the district plan.

My submission is that:*

(You should clearly state whether you support or oppose the specific proposed provisions or wish to have them amended. You should also state the reasons for your views. Please continue on separate sheet(s) if necessary.)

I seek the following decision from the Council:*

(Please give precise details stating what amendments you wish to see made to the proposed Plan Change.

Please continue on separate sheet(s) if necessary.)

That the Burnside Stable at 79 Bamfords
road Allandale be scheduled in the
District Plan.

That the Lockup at Allandale on Council
reserve be scheduled in the District Plan.

2

Details of submitter No: 1075 - Diana Shand

Submitter:	Diana Shand
Submitter Address:	

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 18/05/2023

First name: Diana

Last name: Shand

Postal address:

Email:



Daytime Phone:

Would you like to present your submission in person at a hearing?

Yes

Additional requirements for hearing:

Attached Documents

Name	
Diana Shand PC13 Email	
Diana Shand PC13 Further Email Reply	
Diana Shand submission on plan change 13 14	

Jackson, Andrew

From: [REDACTED]
Sent: Friday, 12 May 2023 11:57 pm
To: Engagement
Subject: Heritage Plan Change (PC13) submission
Attachments: Diana Shand aubmission on plan change 13 & 14.docx

Jackson, Andrew

From: [REDACTED]
Sent: Tuesday, 16 May 2023 12:07 pm
To: Engagement
Subject: RE: Heritage Plan Change (PC13) and Housing and Business Choice Plan Change (PC14) submission

Sorry about that, but in the end I found it very hard to use the compulsory formand it kept freezing my laptop. Will this this answer the questions appropriately?

1. Trade competition and adverse effects: (could or could not) - [this will not /could not have trade competition and adverse effects and I/we are not involved in Trade](#)
2. Gain an advantage in trade competition through this submission: (I am or I am not) [We/I am not involved in trade competition and will gain no advantage in trade competition.](#)

(Note: if you are a person who could gain an advantage in trade competition through the submission, your right to make submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resources Management Act 1991).

Diana

Diana Shand 021 471 989

On 16/05/2023 11:18 NZST Engagement <engagement@ccc.govt.nz> wrote:

Kia ora Diana,

Thanks for your feedback.

Can you please answer the questions below, allowing me to lodge your submission to the correct consultation platform (I apologise that if I missed the answers in your document)?

The plan change consultation has a compulsory form (this is a requirement of the relevant central government legislation), which means there are additional sections that you need to complete to provide feedback.

1. Trade competition and adverse effects: (could or could not)
2. Gain an advantage in trade competition through this submission: (I am or I am not)

(Note: if you are a person who could gain an advantage in trade competition through the submission, your right to make submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resources Management Act 1991).

Once again, thanks for taking your time to provide your feedback.

Ngā mihi,

Aviva Cui

Engagement Assistant

Communications and Engagement

Pronouns: she/her



03 941-6844 | 027 367 1828



Aviva.cui@ccc.govt.nz



Te Hononga Civic Offices, 53 Hereford Street, Christchurch



PO Box 73016, Christchurch 8154



ccc.govt.nz



From: [REDACTED]

Sent: Friday, 12 May 2023 11:47 pm

To: Engagement <engagement@ccc.govt.nz>

Subject: Heritage Plan Change (PC13) and Housing and Business Choice Plan Change (PC14) submission

This electronic email and any files transmitted with it are intended solely for the use of the individual or entity to whom they are addressed.

The views expressed in this message are those of the individual sender and may not necessarily reflect the views of the Christchurch City Council.

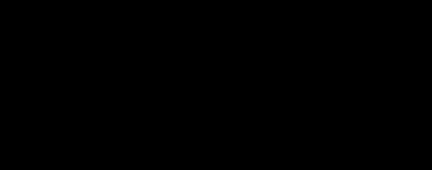
If you are not the correct recipient of this email please advise the sender and delete the email.



Dinaa Shand
Submission on Plan Change 13

I wish to be heard

Diana Shand



I am a resident since 1983 in the inner city west...and wish to make a submission on PC 13 and be heard if there is the opportunity.

I support the proposed Inner-City West Residential Heritage Area

This is not only for people that live in the area, but for all the city. The heritage and character of domestic architecture, the established trees, the public and private gardens, the sunlight, the heritage buildings and the older architecture in both institutions and domestic homes, gives us our colonial development history with a concentration of architectural, cultural and social history that not only attracts tourism, but brings and retains people in our community. This central “cultural quarter” gives a sense of pride and place well beyond the residents.

I support Plan Change 13 measures that recognise of importance of residential heritage and character, and support the all Residential Heritage Areas that are proposed, indeed would further strength them.

I would continue to ask that Cranmer Square be included in the Inner City West Residential Heritage area .

Alternatives to high rise and cramped-living densification:

To these end, I am concerned that the pressured planning for densification, In the interests of providing housing, will have adverse effects on such outcomes. Housing is needed in other centres, but as there has already been major developments to meet post- earthquake needs.

Strengthened heritage buildings that can be used for contemporary purposes.

I still think housing and other goals are achievable and still meet government's expectations for an environment that brings about improved wellbeing of people and communities but only if CCC amends its current draft plan.

The post-quake plan outlined the need to make the CBD more condensed, 'The Core', and to then develop a border around The Core (BD) that would be used for a range of commercial and residential developments enabling mixed use residential/commercial - 'The Frame'. and as the City Council has expressed in its original response to Government, we should not be nor do we need to be, forced into the same Urban Development planning framework as Auckland.

What we risk with this forcing, is to end up with a city of disparate high rise, full of small crowded apartments, or multi developments serving as short-stay AirBnb or for seasonal workers, or investment

properties...not homes. Why has the City Council now taken the path it argued so rationally against? This will risk a drastic effect on our living as well as our heritage value.

There are other ways of increasing the housing supply

Other ways to increase the supply of housing include: restricting AirBnb in non-hosted urban properties, promoting the repair of the still-unrepaired earthquake-damaged houses, incentivising the use of “ghost houses” (the estimated hundreds, if not thousands, of near-permanently empty houses throughout our city), restoring commuter rail to allow to access work and education by regular, rapid affordable public transport from as far as Ashburton or Waipara.

Design controls are needed:

To that end we do not agree with high rise planning without design controls which ensure adequate space and access to sunlight, natural light, fresh air, community facilities and access to open space nearby.

Building heights

In my area with nationally and locally important heritage, we oppose heights which adversely affects existing homes. Many large older residences already provide hidden density by virtue of the original generous dimensions. These dimensions have led to homes being renovated to encompass several living units, or to house the larger or special families which would not otherwise find an apartment sufficient to their needs. In the ICON area many of these provide the basis of “residential heritage” - heritage that “contributes to our own personal sense of belonging and identity and anchors us to our communities and our city” (Our Heritage, Our Taonga – Heritage Strategy 2019-2029)

Buildings that dwarf other buildings, taking their sunlight and privacy, such as Gloucester Towers, rightly identified out of character in scale, adversely affect the quality of life for those around, taking their sunlight and privacy.

Commercial drift undermines residential quality and the commercial district

I oppose commercial drift into our neighbourhood, in which commercial operations taking over residential buildings and alter them irreparably. This is different from people operating low impact business from their own homes or cultural and educational institutions.

Over the decades the CBD has drifted east, displacing domestic residences. This has included the building that now houses the City Council, the offices allowed in the West Avon Flats, the office buildings that now creep along Montreal Street. And still some find it cheaper to put offices in older residential homes, and are allowed over time to list these as Commercial – abandoning all residential use or requirements. This is happening all along the north side of Worcester Boulevard, only a few decades ago full of homes or tenants. We object to the deterioration in the neighbourhood....which must undermine the viability of the Arts Centre, among other things.

Commercial drift west of the river must also undermine the recovery of the pre-earthquake CBD, and the so the vitality of the City itself.

I ask that Commercial use be confined to Oxford Terrace. Noting the struggle of commercial buildings along Cambridge Terrace, why not convert these to residential use? And to keep the liveability and

heritage values of our area, we ask that the Medium Density Zone should extend south from 59 Gloucester Street in a direct line south to the River at 75 Cambridge Terrace, displacing the Mixed Use Zone. This is to avoid the risk of high rise building which would shade and chill the Arts Centre and many residences in season and would detrimentally alter the scale and ambience of this area, as shown so graphically in Appendix 16 of PC 13 Consultation Document .

Details of submitter No: 1076 - Dorothy Lovell-Smith

Submitter:	Dorothy Lovell-Smith
Submitter Address:	



Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 18/05/2023**First name:** Dorothy**Last name:** Lovell-Smith**Postal address:****Email:****Daytime Phone:****Would you like to present your submission in person at a hearing?**

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Attached Documents

Name	
Dorothy Lovell-Smith Email	
D Lovell-Smith Submission for CCC intensification plan may 23	
Dorothy Lovell-Smith Reply Email	

Jackson, Andrew

From: Dorothy Lovell-Smith <[REDACTED]>
Sent: Friday, 12 May 2023 4:05 pm
To: Engagement
Subject: submission on Housing and business choice plan
Attachments: Submission for CCC intensification plan may '23.odt

Hi

I have spent most of today getting more and more frustrated and infuriated with your make a submission form . every time I tried to move forward on the form it seemed to lose everything I had previously written.. So here is the gist of what I want to say attached

Thanks

Dot Lovell Smith

Personal details;

Name Dot Lovell-Smith

email: [REDACTED]

daytime ph [REDACTED]

Address [REDACTED]

My submission;

I oppose the plan to include the Hornby area in the plan for High and Medium density housing intensification.

All planning and development for the future has to take into account climate change, We need to lower emmisions not increase them by building high density towers in satellite suburbs, when the only option for most workers is the private car to get them to work and play

Hornby is a long way from the city centre and some of the surviving housing areas demonstrate past planning that allowed a mix of housing on sections where families could grow their own food to feed their families and neighbours The houses were linked by wide roads, with alleyways linking housing to shopping areas, parks and schools. Since the fifties when the areas of Hei Hei , Islington and Hornby were built to house the workers needed in the area a lot of infill development has taken place. Now old large sections are also being cleared and any planning seems to have been haphazard and determined by private developers being determined to cram as many dwellings as possible onto the section. Existing trees have been destroyed and the dwellings built with no regard to sunshine and privacy. The plan allows for high density and medium density building to take place on the same street. This will look very strange. Slum building. The people of Hornby deserve better.

I support the CCC plan to include the preservation of trees as heritage. More existign trees need to be preserved from development.

Why are the old state housing areas not preserved as heritage sites?. A reminder of a time when workers were valued and supported. Christchurch city was not built by the rich and privileged but by the workers. The tangata whenua and the immigrants who came here.

I very much oppose the idea that large parts of Hornby area should be considered for the private development of high densisty housing and more medium level housing. The existing examples of private development medium density housing in Christchurch eg Addington and just down the road in Amuri Street show that (most) private developers have no desire to provide housing that is attractive and supports mental and physical health, with green space that allows family exercise and and relaxation.

Since the earthquakes there have already been many new housing developments in the area surrounding Hornby where planning has included green space, swales and bike tracks installed. But thoughtful planning seems to have been missing.Eg-Footpaths are missing from suburban streets forcing children and families to walk on the roads. Bus services are inadequate forcing new residents into cars to get to work. With no off road parking this is causing very crowded streets. Bike tracks that have been made in various subdivision do not link to each other to make sensible easy to follow routes to local shops and schools. We need these areas enhanced and made to work well for the inhabitants. We need more land in the Hornby preserved and new land purchased to be

future green space.

Hornby is a 10 km from the city centre and to allow high density housing before better transport facilities exist is madness.

The local transport infrastructure is already struggling. Road travel in the area has increased hugely since the quakes and the migration out west, Our main roads are clogged for most of the day. Distribution of goods through trucking is the main local industry and until the use of the existing and/or a new rail network is greatly increased, and buses travel to all parts of the city from Hornby any high density housing should be concentrated closer to the city.

Why not make all buildings containing retail and light industry in Moorhouse Av, Fitzgerald Av Arenues, and Sydenham, three storied with housing accomodation being the top story. The separation between residential, retail and light industry is a hangover form Victorian times when light industry was often very smelly or dangerous.

Increasing the population in Hornby is a no-brainer . We are lacking in many community facilites. It has taken 20 years of agitation to get the CCC to accept the idea of a need for a decent library and swimming pool to support the health and development of local children and start the build. Its still not finished and would probably prove to be inadequate for an increased population.

We dont have huge parks, and lots of sports fields, huge sports centres, convention and community centres, a university, art galleries, movie theatres, night clubs, restaurants or the sea close by. We don't have frequent bus services and train services that access work and education centres. We have streets full of cars and enormous trucks. Overloaded carparks. Crumbling narrow footpaths, (Or no footpaths, around the shopping centres and streets) Our public pathways have become carparks and are often strewn with rubbish from the many fast food and liquor outlets.

There are many examples of well planned housing developments around the world, where the health and well being of the residents is paramount. We need any development to be attractive and well designed. Suburbs that are built and work for happy healthy parents and children. We do not want suburban housing planned by private developers out to make a quick profit. Housing developments need to be well planned and built by governments works departments and community owned.

We definitely do not need to continue to be the suburb that is ignored until it can be a dumping ground for new problems.

12.5.2023

Jackson, Andrew

From: Dorothy Lovell-Smith <[REDACTED]>
Sent: Monday, 15 May 2023 8:50 pm
To: Engagement
Subject: Re: submission on Housing and business choice plan

Hi Aviva

Thank you for your email. You ask me to answer some questions but .. I do not understand what the questions are. I presume the first two questions could be about whether I gain advantage in my business or trade by putting my point of view.

I am in fact a retired person living on the pension in the 75-70yrs age bracket. I do not own a business or practise a trade. So I think the answer is [no.to](#) both questions.

The questions about whether I want to present my submission in person.

1.No I do not want to present in person

2 No I do not want to combine with someone else to present my submission,

Please please find someone who can write a submission form [that.is](#):- clear, simple.and not too "techie".but easy to use

-includes lots of space for personal opinion

-is not only asking for a point on a scale of agreement. (Sometimes I disagree with the whole basic premise)

-is realistic in the assessment of how long it will take to read the supporting information and write a submission. We should be able to save the form and return to it at a later time. OR If it can't be 'saved' we need to know that in the first paragraph so we can be encouraged to present our ideas by attaching a separate document..or copying and pasting from a saved document.into a designated space.

-includes the closing date.

Thank you

Dot Lovell-Smith



Virus-free. www.avast.com

On Mon, 15 May 2023 at 07:39, Engagement <engagement@ccc.govt.nz> wrote:

Mōrena Dorothy,

Thanks for submitting your feedback on Proposed District Plan

I am so sorry to hear about your frustration. I can confirm that I will submit for you to the correct confirmation platform (as a normal submission instead of a late submission). Can you please answer the below questions?

The Plan Change consultation has a compulsory form (this is a requirement of the relevant central government legislation), which means there are additional sections that you need to complete to provide feedback.

1. **Trade competition** and adverse effects: could or could not
2. **Gain an advantage in trade competition** through this submission: I am or I am not

(Note: if you are a person who could gain an advantage in trade competition through the submission, your right to make submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resources Management Act 1991).

1. Would you like to present your submission in person at a **hearing**? Yes or No.

2. If others, make a similar submission I will consider **presenting a joint case** with them at the hearing (do not tick if you would not consider a joint case). Yes or No.

Once again, we appreciate your time, and appreciate your feedback.

Ngā mihi,

Aviva Cui

Engagement Assistant

Communications and Engagement

Pronouns: she/her



03 941-6844 | 027 367 1828



Aviva.cui@ccc.govt.nz



Te Hononga Civic Offices, 53 Hereford Street, Christchurch



PO Box 73016, Christchurch 8154



ccc.govt.nz



From: Dorothy Lovell-Smith <[REDACTED]>
Sent: Friday, 12 May 2023 4:05 pm
To: Engagement <engagement@ccc.govt.nz>
Subject: submission on Housing and business choice plan

Hi

I have spent most of today getting more and more frustrated and infuriated with your make a submission form . every time I tried to move forward on the form it seemed to lose everything I had previously written.. So here is the gist of what I want to say attached

Thanks

Dot Lovell Smith

This electronic email and any files transmitted with it are intended solely for the use of the individual or entity to whom they are addressed.

The views expressed in this message are those of the individual sender and may not necessarily reflect the views of the Christchurch City Council.

If you are not the correct recipient of this email please advise the sender and delete the email.



Details of submitter No: 885 - Peter Dyhrberg

Submitter:	Peter Dyhrberg
Submitter Address:	

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 18/05/2023

First name: Peter

Last name: Dyhrberg

Preferred method of contact

Postal address:

Email:

Daytime Phone:

Would you like to present your submission in person at a hearing?

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Person of interest declaration: I am


*

Explain the grounds for saying you come within category (a) or (b) above:

Note to person making further submission:

- A further submission can only support or oppose an original submission listed in the summary. It is not an opportunity to make a fresh submission on matters not raised in the submission.
- A copy of your further submission must be served on the original submitter within 5 working days of making the further submission to the Council

Attached Documents

Name	
Peter	

Robson, Gina

From: Peter Dyhrberg <[REDACTED]>
Sent: Saturday, 13 May 2023 3:07 pm
To: Engagement
Subject: Proposed Plan Changes 13 and 14.

To whom it may concern,

1. I confirm this email is from Peter Dyhrberg a resident at 118 Chester Street Christchurch.
2. I endeavoured to transmit a submission on the above-noted proposed Plan Changes last night, well before the 11:59 pm deadline but was unable to effect transmission for lack of a "passcode" or password despite entering my email address and then invoking the "Resume" your submission option and requesting a passcode be sent to me.
3. In the circumstances I therefore request acceptance of my brief submission via this email, now transmitted. (Another point I could not help noticing about the CCC web site for this subject was that ,in a number of locations where there was relevant information, the indication was still being given that the deadline was on the 3rd May 2023.)
4. SUBMISSION.
 - (a) I support the proposed Residential Heritage Areas. In particular I support the proposed Chester Street / Dawson Street Residential Heritage Area including the proposed Interface rules for the adjacent sites which share a boundary with that proposed Residential Heritage Area.
 - (b) I oppose the proposed extent of the High Density Residential Area to the areas of the city north of Armagh Street and between Fitzgerald Avenue to the East and Madras Street to the West. I submit that area should be zoned as a Medium Density Residential Area with building heights limited to the same heights as are proposed for the other such MDR areas (understood to be 14 metres), preferably with a requirement for a greater

setback from any shared boundary with sites in the Residential Heritage Area than is proposed for setbacks from internal boundaries, generally, for the MDR zone(s).

Yours, Peter Dyhrberg.

Details of submitter No: 1077 - Callum Ward

Submitter:	Callum Ward
Submitter Address:	[REDACTED]
Organisation:	Waihoru Spreydon-Cashmere-Heathcote Community Board

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 15/05/2023

First name: Callum

Last name: Ward

Organisation:

Waihoru Spreydon-Cashmere-Heathcote Community Board

Postal address:

Email:

Daytime Phone:

Would you like to present your submission in person at a hearing?

Yes

Additional requirements for hearing:

Consultation Document Submissions

Provision: Chapter 14 Residential

Support

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

My submission is that:

There are more feedback in this submission. Please see the attachment.


1. Residential Heritage Areas

The Board supports the creation of two Residential Heritage Areas in Waihoru Spreydon-Cashmere-Heathcote that merit inclusion as a Qualifying Matter, these being:

- MacMillan Ave (Cashmere)

Shelley/Forbes St (Sydenham)

Attached Documents

Name
PC13 WSCH Community Board 

Details of submitter No: 1078 - Julie Villard

Submitter:	Julie Villard
Submitter Address:	

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 16/05/2023

First name: Julie

Last name: Villard

Postal address:

Email:


Daytime Phone:

Would you like to present your submission in person at a hearing?

☐ Yes

Additional requirements for hearing:

Attached Documents

Name	
Submission P13 Julie Villard	

Screen shots of my submission for P13

I tried 7 times to make a submission, and got extremely frustrated with the system, ending in a grey screen frozen after having hit the submit button.

You have now a copy of each page of my submission I would like acknowledged. Best regards Julie Villard

Our proposed Heritage Plan Change
+

mission

If you consider there are compelling reasons why your contact details should be kept confidential, please contact our Statutory Administrator Adviser on 03 941 8999 or 0800 800 169 (Banks Peninsula).

[View the Christchurch City Council Privacy Statement 2020.](#)

Are you submitting as an individual or as an organisation?

☒ Individual

☐ Organisation

First name: *

Last name: *

On behalf of:

As part of your submission, you must provide an address we can use to contact you.

Email: *(preferred)*

Postal address: (or alternative method of service under section 352 of the Act)

21 Bridle Path, Lyttelton 8082

Daytime Phone:

1. Submitter Details
2. Submissions on Plan Change
3. Review my Submission Points
4. Supporting Documents
5. Submit

Have your say

Submission sessions time out after 45 minutes

Our feedback form works best if you're using Google Chrome. If you are using a different browser and you think you will need a little longer than this to make your submission, we advise cutting and pasting from a word document, to avoid losing any information.

If you have any questions, please contact the Engagement Advisor.

1. Submitter Details

2. Submissions on Plan Change

3. Review my Submission Points

4. Supporting Documents

5. Submit

Here is a table showing all the submission points that you have saved so far. If you would like to edit a point, simply click edit and save again. To delete a point, use the delete button provided in the table.

Plan Section	Support/Oppose	I seek the following decision from the Council <i>If seeking to make changes to a specific site or sites, please provide the address or identify the area</i>	My submission is that

Remove any yellow sites identified by Council as "neutral" (yellow) on the location map appendix 9.3.7.8.6 Lyttelton residential Heritage area.

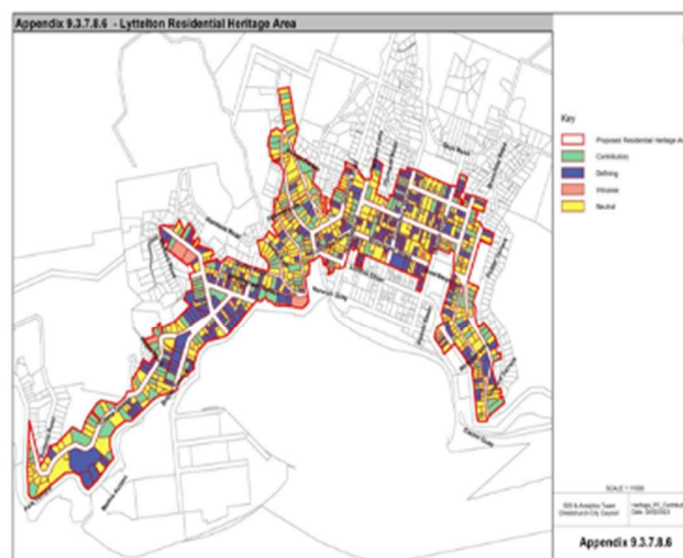
Remove entirely Lyttelton from the Heritage zoning.

I would like to advocate for people living in Lyttelton. Lyttelton is a village with more than 400 types of architecture according to Wikipedia it is a working port, and was at the epicentre of the 2011 earthquake. Lyttelton's fabric is constantly evolving, for the better and for the worse and that's why Lyttelton is well-known for: eclectic architecture. The new zoning called "heritage area", is a mistake, and Lyttelton will be locked in a cast iron "historical" image of the past, where every single move will be overseeing and over restricted by the Council. Not to understand the need for a heritage area, that's why we have the character overlay area already in place. Well, even lately, it has been hugely controversial with 2 resource consents granted for the same in less than 2 years, the 2 approved by Council, and hugely rejected by the people of Lyttelton: 1 design is stuck in the past, the other one is modern. link here:

(<https://www.stuff.co.nz/national/126903301/planned-lyttelton-apartment-building-designed-by-firm-behind-landmark-building-in-wellington>)

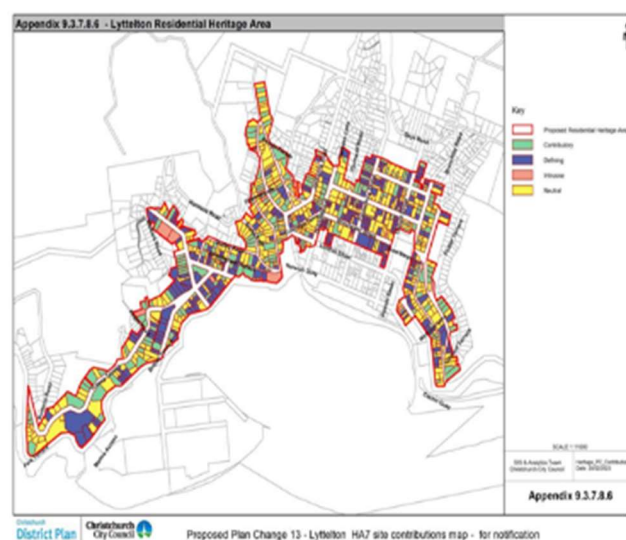
The Heritage zoning is once again too large and should be limited to sites directly identified as defining (blue) and contributory (green) the location map appendix 9.3.7.8.6 Lyttelton residential Heritage area

Location



Heritage
zoning.

Location



Not more than that. As you can see on the map half of the sites of the proposed Lyttelton residential Heritage area are in yellow, meaning "neutral" they do not have any architectural significance or historical values.

It is insane to me, to ask all these sites to be included in this new zoning. These sites do not deserve to be punished, or their current value reduced. One more thing: More RC for everyone is ridiculous, beautiful hatches from randomness, and Lyttelton is very much that.

1. Submitter Details

2. Submissions on Plan Change

3. Review my Submission Points

4. Supporting Documents

5. Submit

If you have any questions, please contact the Engagement Advisor.

1. Submitter Details

2. Submissions on Plan Change

3. Review my Submission Points

4. Supporting Documents

5. Submit

Please click the submit button to finalise your submission. Once you click submit, you will be sent a confirmation email from the Council.

*

☒ I could

☐ I could not

Gain an advantage in trade competition through this submission

☒ I am

☐ I am not

directly affected by an effect of the subject matter of the submission that :

a. adversely affects the environment, and

b. does not relate to the trade competition or the effects of trade competitions.

Note to person making submission:

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act

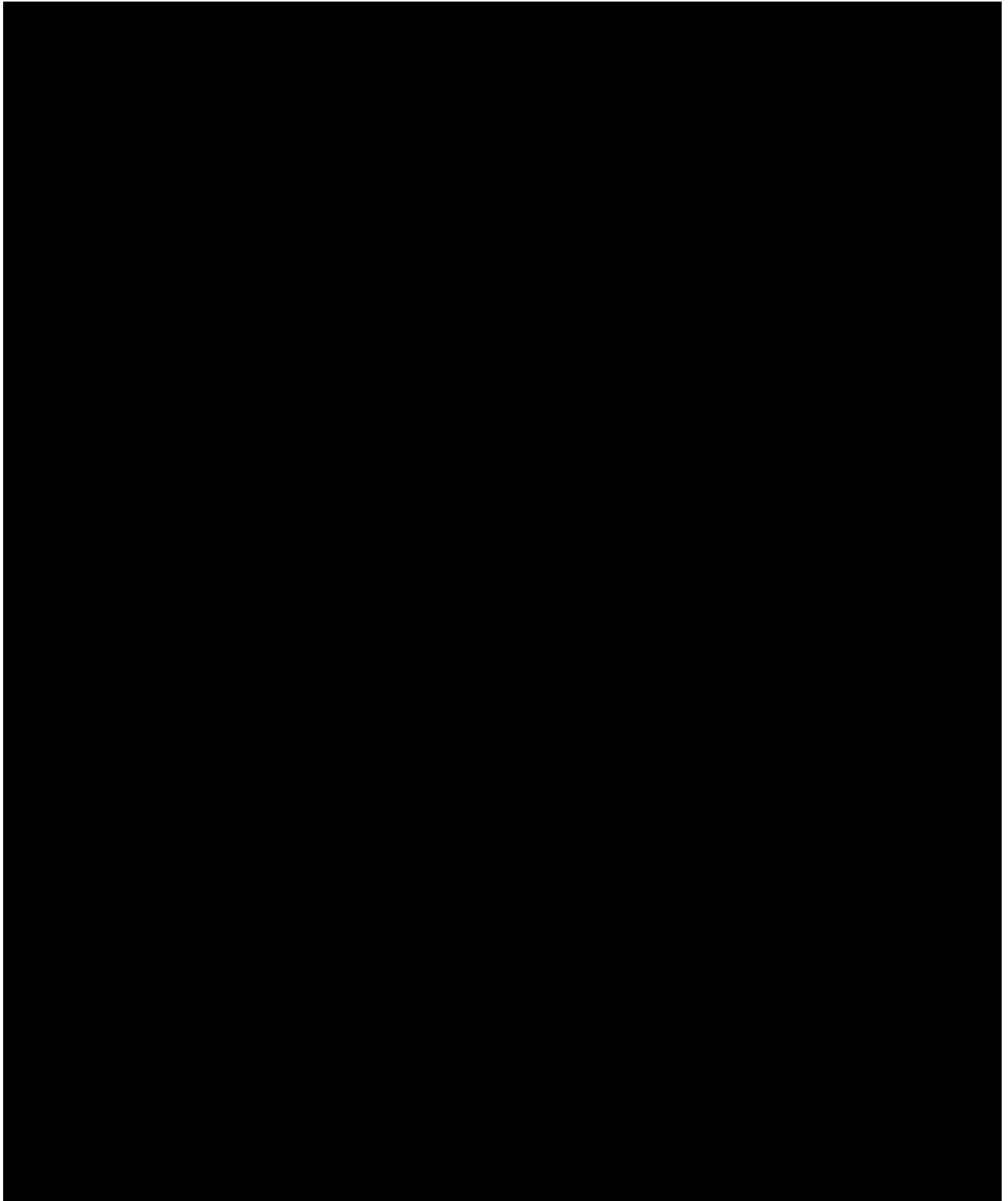
- 1991

Would you like to present your submission in person at a hearing?

☒ Yes

☐ I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Additional requirements for hearing:



Details of submitter No: 1079 - Dr. Bruce Harding

Submitter:	Dr. Bruce Harding
Submitter Address:	

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 16/05/2023

First name: Dr. Bruce

Last name: Harding

Postal address:

Email:


Daytime Phone:

Would you like to present your submission in person at a hearing?

☐ Yes

Additional requirements for hearing:

Attached Documents

Name	
Dr Ann PC13	

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 22/05/2023

First name: Bruce

Last name: Harding

Postal address:

Email:

Daytime Phone:

Would you like to present your submission in person at a hearing?

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Consultation Document Submissions

Provision: Chapter 14 Residential

Seek Amendment

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area:

Clarity on the RHA 8 (Macmillan Avenue) boundary, as it was all covered in the Special Amenity Area (SaM 17 & 17A) provisions in the late 1990s City Plan. Why is one end of the street singled out and the home of John Macmillan Brown (35 Macmillan Ave) excluded? Do the former SaM17/17a character overlays still in place and continue to have effect? If not, why not? I would seek policy clarity in the finalized PC13 documentation by way of footnote or policy box for the better informing of citizens and ratepayers. The underlying heritage kaupapa/philosophy and criteria for character retention needs to be clearly affixed to planning documents/schemata.

My submission is that:

I am speaking to Residential Heritage Area 8 (eastern Macmillan Avenue) and the need for the clear highlighting of historic properties in the CCC's digital & online files. I find it puzzling that collective character recognition (p.24) is not maintained throughout the whole of Macmillan Avenue but is focused rather clunkily on John Macmillan Brown's Lot DP sale of 1908. I would also wish to see an update on the delisting (if any) of Protected Trees in the Cashmere area within (or beyond) the RHA 8 zone, however it is defined.

My submission is that:

I would seek confirmation that homes/properties of iconic citizens (in all city RHAs) are clearly delineated in the revised City Plan—so for Cashmere, for example, “Rise Cottage” (Westenra Terrace), the Ngaio Marsh House (37 Valley Road), etc. My PDF re the Cashmere area outlines the names and addresses of a number of key cultural heritage sites/private properties (e.g. Cashmere Village Green, the Cashmere Presbyterian Church and ‘Corrie’, the Mackay family home in Macmillan Avenue) and urges that these are very clearly signaled. The same logic would pertain to all RHAs in Otautahi/Christchurch.

Attached Documents

Name
Bruce Harding

Submission upon Dr Ann McEwen's PC 13 Report for Macmillan Avenue, Cashmere (1 February 2022).

As a long-standing resident and submitter to the 1995 City Plan revision hearings, and former Committee member of the now defunct Cashmere Residents' Association and SCAP Committee of the former Spreydon-Heathcote Community Board, I wish to make some constructive suggestions and also offer to appear *in personam* before a panel at a later stage of this consultation cycle. I hold various documents and files which I would be happy to supply and donate to the CCC Heritage stock (perhaps at Turanga), much of which relates to the Cashmere Village Green controversy of 1995-2000 which led to the happy outcome of the Cashmere Village Green Management Plan.

I am puzzled as to why CCC have removed the whole of Macmillan Avenue from the former Special Amenity Area 17 & 17A¹ in this new RHA, and why this document does not also identify a number of important cultural-architectural heritage properties (some outside the specific area of RH8 but sited in the wider Cashmere historic precinct) in something like a focus box.

I shall now send a running response commentary to various pages in Dr McEwan's excellent document:

- It seems odd/rather creaky or random to create Heritage Area 8 simply out of John Macmillan Brown's July 1908 subdivision zone east of Whisby Rd, when after his death in January 1935 at 35 Macmillan Avenue, 'his' end of 'his' street is excluded from the HA8 zone. Indeed, his 1915 Hurst Seager home ('Holmebank II') lies right outside that HA8 zone in a street named after him as an early land-owner and developer. Macmillan Avenue (often mis-spelt MacMillan on CCC documents) was first Macmillan Road at the east end to Whisby and the undeveloped western zone (i.e. west of Whisby Rd demarcation) was called Macmillan Track probably until after JMB's death. The reason for this cannot be a higher level of heritage intactness as Dr McEwan concedes that the 21 residential properties denote "a range of styles." There is a new Cymon Allfrey home at 18 (Clausius) and a completely modern replacement also at 16 Macmillan Ave on the site of the Mackay sisters' 'Corrie'. Homes designed by Hurst Seager and his pupil Cecil Wood (and other architects) can be found at the western end of the avenue, which escapes categorization.

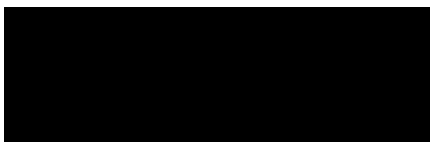
¹ See Special Amenity Area 17 & 17A: Hackthorne/MacMillan[sic]/Dyers Pass: Is your property in this Special Amenity Area?' Urban Design Team, City Solutions, CCC April 2001 (leaflet). Some of the properties highlighted in that document were demolished after the 2010-11 earthquake sequence.

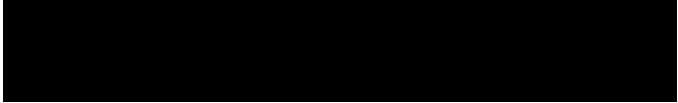
- I would respectfully suggest that the www.kahurumanu.co.nz/atlas site of TRONT secures the view that the site of Pukeatua is not precisely delineated as a regional marker for Cashmere.
- A typo cites Heritage NZ as “Pouhere Toanga”--TAQNGA.
- When discussing biota, the consultant (p.3) elides 2 Whisby Road and 35 Macmillan Avenue in citing the late Thelma Strongman’s 1984 book to describe Professor Macmillan Brown’s garden varietals. Mrs Leggat (as she later became) intended to describe the ‘Holmebank’ garden which is now outside Heritage Area 8. There was little noted vegetation on Sue Kennett O’Brien’s family property at 2 Whisby (now owned by Oscar Alpers).
- I would suggest that the Bibliography also includes *The Memoirs of John Macmillan Brown* (edited by Mrs Viola Notariello). (Christchurch: University of Canterbury/Whitcombe & Tombs, 1974). [UC Publication # 19: General Editor A.N. Brooks. ISBN 900302 19 3]
- On page 3 there is a failure to credit the architect Robert J. Seward (Manson, Stanton & Seward) for designing both the extension and the tower for the Cashmere Hills Presbyterian Church in 1960-61.
- On page 5 reference is made to John Dyer. The land deeds for the zone across to Governor’s Bay called the Cashmere portion “Latters Spur Road”. This should be referenced for historical accuracy.
- On page 7 it would be useful to re-check Gordon Ogilvie’s 1977 book *The Port Hills of Christchurch* and name the Rev Isitt and Mayor Tommy Taylor, whose home at 63 Dyers Pass Road (‘Whareora’) sits opposite The Green. It may not be heritage-listed but should go in my info-box in this document.
- On page 8 vague reference is made to a “bus-stop” at the Dyers Pass-Macmillan junction. This community shelter was installed as bus services ceased. It is the positive outgrowth of a large community conflict with CCC and I paid for and installed a metal plaque inside it to record this. It was intended to be a small replica of the Sign of the Bellbird exterior but Stephen Grey and a CCC design team reconfigured it most sensitively to align visually with the design values of the Presbyterian Church Hall (and church).

- I think a Heritage Building summary-box graphic, supplemental to the HA8 report, should note the existence of older 'character' properties within or outside the HA zone, including JMB's Hurst Seager home (35 Macmillan); 'Corrie' (now demolished) for the Mackay sisters (16 Macmillan); the Ngaio Marsh House at 37 Valley Road (with Sherwood Lane access); Ursula Bethell's 'Rise Cottage' in Westenra Terrace, Dean Harper's home 'Cloudsley' at 39 Macmillan, along with Norman and Enid Hardie's A-frame at 15A and doubtless others not identified by me. The Ngaio Marsh House (1906) is subject to a CCC Covenant (1999) and was originally designed by Samuel Hurst Seager and amended by the architectural practices of Guy Cotterill and Don Donnithorne. Properties at 14, 25 (Miles Warren & Maurice Mahoney), 29, 34 (Cecil Wood and later Collins, Hunt, Loveridge), 40, 43, 44 and 46 (Alan Brassington's) also seem to possess SaM-like heritage values and character 'intactness'. (I have doubtless missed some others.)
- I am not arguing for any particular outcome—merely raising a flag for the commissioner/s to cross-check why these properties were actually removed from coverage—i.e. why eastern Macmillan Avenue has been so strictly delimited in zoning Heritage Area 8 for PC13. Does any of the old SaM coverage still apply, at a lower level of protection, for properties which are sited west of the Whisby Road subdivision line of 1908? Is the logic for this new delimitation, under Plan Change 13, a policy view that character retention eastwards of the Whisby boundary line is essential as properties sited there represent the oldest Macmillan Avenue building stock? That makes sense but, if so, it needs to be better emphasized in any final document, for the better understanding of Macmillan Avenue residents.
- I notify the Council that I hereby reserve the right to appear briefly on any substantive issues arising out of the PC13 when 'in person' hearings ensue. I would send in advance and also bring with me any actual change or modification submission at that point.

Yours faithfully

(Dr) Bruce Harding
'Harwood'





Save time and do it online

ccc.govt.nz/haveyoursay

Have your say

Housing and Business Choice Plan Change 14 and Heritage Plan Change 13

Clause 6 of Schedule 1 Resource Management Act 1991

Before we get started we'd like to ask a few questions about you. This helps us better understand who we are hearing from.

Gender: ☒ Male ☐ Female ☐ Non-binary/another gender

Age: ☐ Under 18 years ☐ 18-24 years ☐ 25-34 years ☐ 35-49 years ☐ 50-64 years
☒ 65-79 years ☐ over 80 years

Ethnicity: ☒ New Zealand European ☐ Māori ☐ Pacific Peoples ☐ Asian
☐ Middle Eastern/Latin American/African ☐ Other European ☐ Other

* Required information

Name*

BRUCE HARDING

If you are responding on behalf of a recognised organisation, please provide:

Organisation's name

Your role

N/A.

Trade competition and adverse effects* (select appropriate)

☐ I could / ☒ could not gain an advantage in trade competition through this submission.

If you are a person who could gain an advantage in trade competition through this submission, are you directly affected by an effect of the proposed plan change/part of the plan change that –

(a) adversely affects the environment, and

(b) does not relate to the trade competition or the effects of trade competition?

☐ Yes ☐ No

* A person who could gain an advantage in trade competition through the submission may make a submission only if you answered Yes to the above, as per clause 6(4) of Schedule 1 of the Resource Management Act 1991.

Please indicate by ticking the relevant box whether you wish to be heard in support of your submission*

☒ I wish to speak in support of my submission on Plan Change 13

☐ I wish to speak in support of my submission on Plan Change 14

☐ I do not wish to speak.

Joint submissions (Please tick this box if you agree)

☒ If others make a similar submission, I will consider presenting a joint case with them at the hearing.

If you have used extra sheets for this submission, please attach them to this form and indicate below*

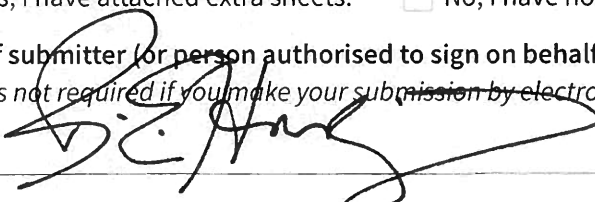
☒ Yes, I have attached extra sheets. ☐ No, I have not attached extra sheets.

I have emailed
in PDF to Jane
West

Signature of submitter (or person authorised to sign on behalf of submitter)

A signature is not required if you make your submission by electronic means.

Signature



Date 11 May 2023

Have your say
Heritage Plan Change 13

cf. My PDF Submission,
Sent to Jane
West as it
would not upload onto your site.

The specific provisions of the plan change that my submission relates to are as follows:*

(Please continue on separate sheet(s) if necessary.)

Residential Heritage Area 8 (eastern Macmillan Avenue) and the clear highlighting of historic properties in the CC's digital & online files. It is puzzling that collective character recognition (p. 24) is not maintained throughout the whole of Macmillan Avenue.

My submission is that:*

(You should clearly state whether you support or oppose the specific proposed provisions or wish to have them amended. You should also state the reasons for your views. Please continue on separate sheet(s) if necessary.)

I would seek confirmation that ~~sets~~ homes/properties of iconic citizens are clearly delineated in the City Plan. My PDF re the Cashmere area outlines the names and addresses of key Cashmere cultural heritage sites/properties (e.g. the Ngāio Marsh House and the Cashmere Village Green) are clearly signaled.

I seek the following decision from the Council:*

(Please give precise details stating what amendments you wish to see made to the proposed Plan Change.

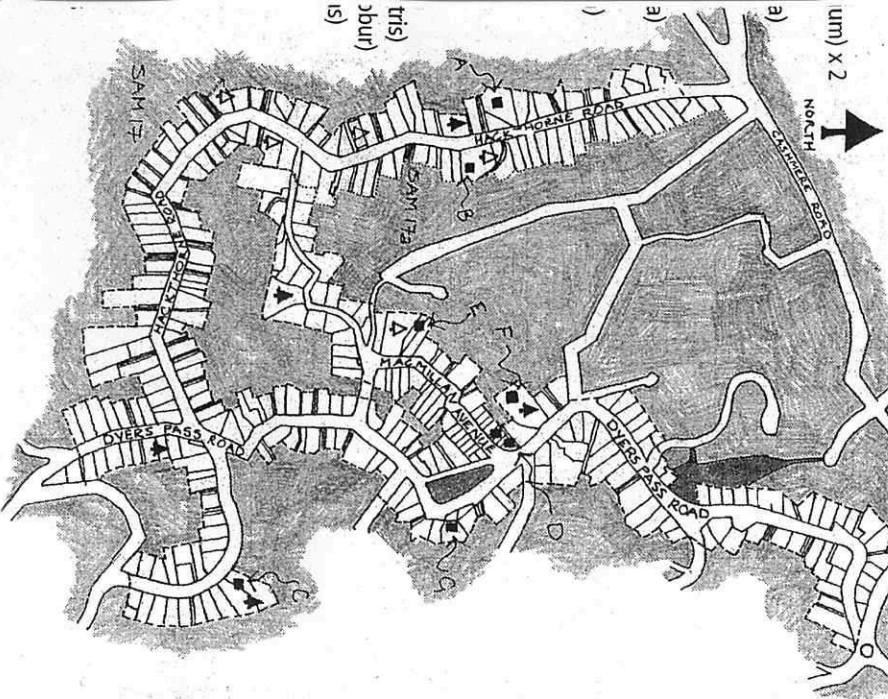
Please continue on separate sheet(s) if necessary.)

Clarity on the RAHA 8 (Macmillan Avenue) — why is one end of the street singled out? Do the old SAM 17 & 17a Character Area overlays continue to have effect? (i.e., as per the 1996 at-seq. City Plan overlays)

I would plan to speak to the Submission forwarded electronically to Mr West.

- 1910 two storey dwelling
- 1915 English Domestic Revival style dwelling
- 1928 two storey wooden residence
- 1929 Cashmere Hills Presbyterian Church
- 1918 wooden dwelling
- 1896 two storeyed English Domestic Revival residence
- 1897 dwelling 'Whareora'

Planted Trees

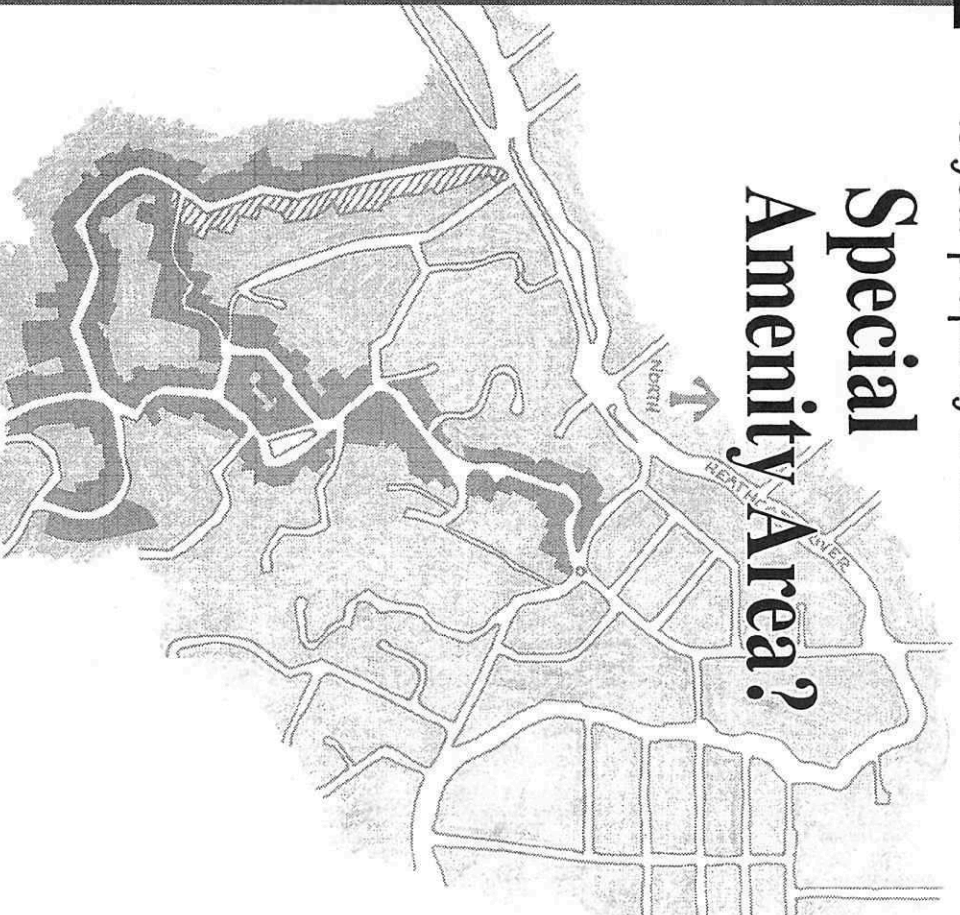


17

special amenity area

Is your property in this

Special Amenity Area?



SAM 17 & 17a
Hackthorne/MacMillan/Dyers Pass

Urban Design Team, City Solutions



CHRISTCHURCH

What is a SAM?

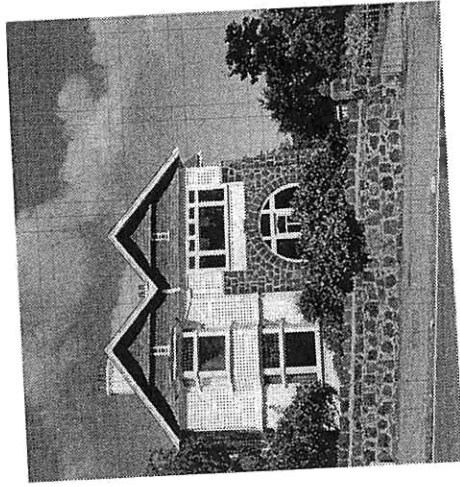
A SAM is a Special Amenity Area. These are areas within the living zones of Christchurch City that are in some way distinctive from the surrounding neighbourhoods and are considered to have a character worth retaining. Neighbours and communities need to rely on each other to help maintain this character effectively, in combination with Council initiatives.

The Character of SAM 17 & SAM 17a

SAM 17 is located in Cashmere and includes the lower reaches of some of the better known roads on Cashmere hill such as Dyers Pass Road and Hackthorne Road. SAM 17a follows the eastern side of Hackthorne Road from MacMillan Avenue to Cashmere Road.

The SAMs have a mix of housing, the majority of which was built prior to 1920. The most predominant style of housing is the English Domestic Revivalist style, characterised by the steep pitch gable main roofs, with small dormers or secondary roofs, all of which tend to be tiled. They also have weatherboard exteriors with large windows, and porches facing the street. These features are more predominant in SAM 17a than SAM 17, resulting in stronger City Plan controls in the latter SAM.

The area is also notable for the rock and stone walls and well vegetated sites, incorporating both large trees and shrub planting. Fences and hedges tend to be of a medium height, and are common. The special quality of this area is that all these elements result in an interesting landscape and streetscape with glimpses into properties and planting spilling into the street, drawn together by the common architectural elements.



Designing within this Character

New buildings in SAM 17 and SAM 17a should be designed to work with the existing character, rather than imitate it. When designing new buildings consider the position of adjoining buildings, and the way that they are placed in the landscape. Care should be taken to relate the building to the topography rather than just adjusting the site to suit the building.

Combining forms that are similar in scale and height to the existing buildings, for the overall building shape, will help maintain the area's character. A similar amount of surface texture and ornamentation should be used, but need not necessarily be weatherboards, shingled gable ends or other features from the existing buildings. Instead attention should be paid to how these add to the character of the area, and how a current method might be used to achieve this same effect.

Also consider the way that the existing buildings, and their windows and doors face the street. The use of appropriate vegetation and landscaping can emphasise these elements and increase the visual connection with the street, while still maintaining privacy. The quality and style of fencing is important as it can have a large impact on the neighbourhood. If fencing is necessary,

choose the materials and height of the fence carefully in combination with boundary planting, so that it is in keeping with the existing qualities of the street. Stone retaining walls are very much a part of the character of these older hillside suburbs and may be considered a first choice if a fence or wall is needed. Also consider alternatives to fencing and walls such as hedges, as a way to link planting with the street. 'Thinking about Fencing' – a guide to fencing alternatives, is available free from the Christchurch City Council.

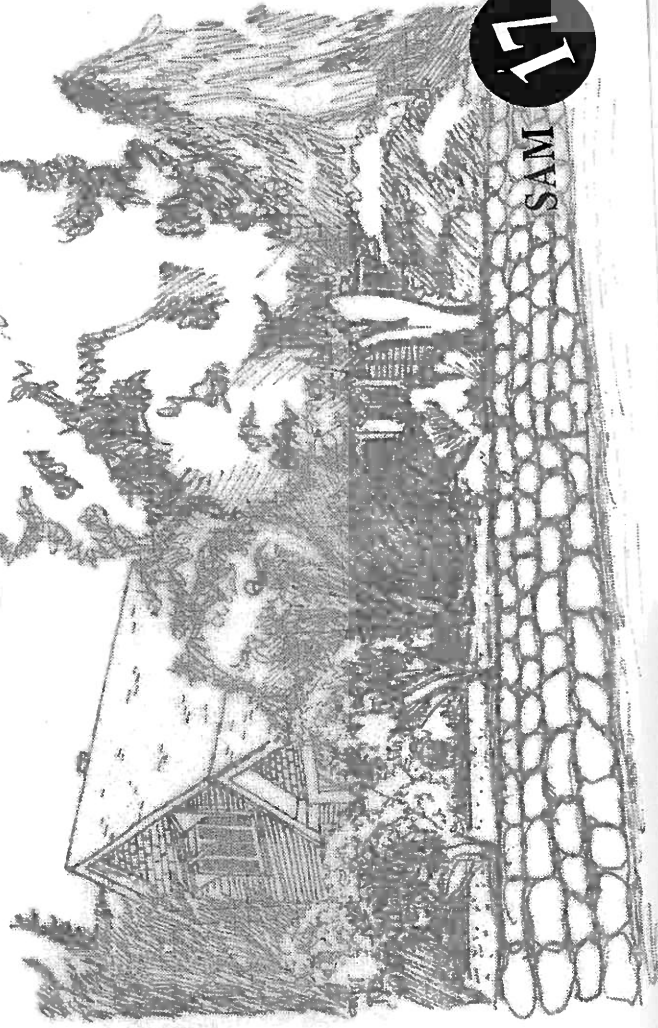
Additionally, the placement of garages in the front yard can be visually detrimental and is best avoided.

City Plan Rules

SAM 17 and SAM 17a are in the Living Hills zone in the Christchurch City Plan. The Plan contains a set of rules that regulate the way sites can be developed. There is an additional rule to the standard Living Hills rules that applies to SAM 17 and SAM 17a, which acknowledges the areas as having special qualities that should be retained. The rule below applies to both SAM 17 and SAM 17a. It is:

- **Road Setback (Streetscene)**
Road setback is the distance that a building must be set back from the front boundary. Buildings are required to be set back at least 4.5m because of the visual impact that the relationship between the buildings and their proximity to the street has on the overall character of the street.
A further rule applies to 17a only. It is:
 - **External Appearance**
Resource Consent is required when an alteration to the external appearance of an existing building, or a new building, is proposed in SAM 17a, that can be seen from a public place such as the street.

If you are considering altering the external appearance of a building in SAM 17 or 17a, or building anew, and you need a Resource Consent it is recommended that you seek advice from the Urban Design Team in City Solutions of the Christchurch City Council, before submitting your application.



Our proposed Housing and Business Choice and Heritage Plan Changes (13 &14)

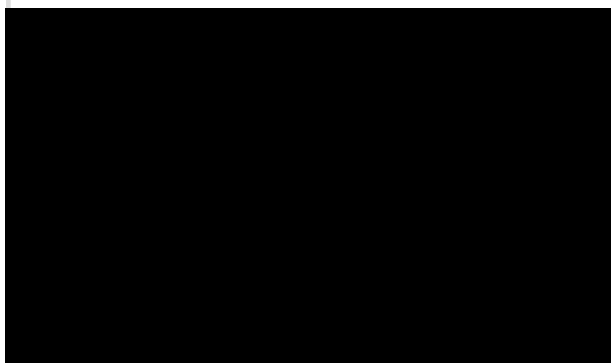
Submitter Details

Submission Date: 16/05/2023

First name: Jo **Last name:** Appleyard

Organisation: Carter Group Limited

Preferred method of contact Email



Daytime Phone:

I could not
Gain an advantage in trade competition through this submission

I am not
directly affected by an effect of the subject matter of the submission that :
a. adversely affects the environment, and
b. does not relate to the trade competition or the effects of trade competitions.

Note to person making submission:

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991

Would you like to present your submission in person at a hearing?

☒ Yes

☐ I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Additional requirements for hearing:

Attached Documents

File

PC13 Submission - Carter Group Limited 3443-8088-7587

Form 5

**SUBMISSION ON PUBLICLY NOTIFIED PROPOSAL FOR POLICY STATEMENT OR
PLAN, CHANGE OR VARIATION**

Clause 6 of Schedule 1, Resource Management Act 1991

To Christchurch City Council

Name of submitter: Carter Group Property Limited (*Carter Group*)

- 1 This is a submission on the proposed Heritage Plan Change 13 (*PC13*) to the Christchurch District Plan (the *District Plan*).
- 2 Carter Group could not gain an advantage in trade competition through this submission.
- 3 Carter Group's submission relates to the whole of PC13. The specific relief sought by Carter Group is set out at **Appendix 1** and elaborated on below.
- 4 Carter Group wishes to be heard in support of the submission.
- 5 If others make a similar submission, Carter Group will consider presenting a joint case with them at a hearing.

STRATEGIC OBJECTIVES

- 6 Carter Group generally opposes PC13 to the extent that it is inconsistent with Strategic Objectives 3.3.1 and 3.3.2 of the District Plan. Carter Group seek that the provisions of PC13 are made consistent with those Strategic Objectives.

CARTER GROUP SITES WITH HERITAGE INTERESTS

- 7 Carter Group owns land at 32 Armagh Street, known as the former Girls High Site (the *Site*). That land is partly covered by a heritage setting (heritage setting number 287) and includes a heritage item (the 'Blue Cottage' – heritage item number 390). The extent of the Site, and the heritage setting and item are shown below:



Figure 1: Site shown in yellow, approximate location of heritage setting shown in orange, and item location indicated by a red cross.

- 8 The District Plan statement of significance for the building notes, among other things, its historical significance as a c.1875 colonial cottage and its architectural significance due to the 'authenticity of its exterior and retention of some of its original interior detailing'. However, the building is in a poor state of repair with evident damage to its exterior and, as noted in the statement of significance, has had original architectural features removed over time. The heritage setting for the building is of no apparent significance in its own right – constituting a gravelled car park.
- 9 Accounting for these attributes, the building and setting are considered to be of little to no heritage value.
- 10 The scope of PC13 is broad and presents a timely opportunity to review the extent of the schedule of heritage items. Such a review is especially relevant in instances where additional information on individual items has become available following the

District Plan Review. The provision of such information is integral to the need to carefully weigh costs and benefits of any proposed regulation (such as scheduling) under s 32 RMA.

- 11 For the reasons described above, the Blue Cottage's heritage status is considerably diminished and can no longer be considered significant. This building and its setting should no longer be included on the Schedule.

- 12 Carter Group therefore seeks that:

- 12.1 The Blue Cottage (Heritage Item 390) be removed from the Schedule of Significant Historic Heritage in Appendix 9.3.7.2 of the District Plan; and

- 12.2 Associated Heritage Setting 287 be removed from the same.

The proposed residential heritage areas

- 13 PC13 introduces 11 new heritage areas into the District Plan, with associated objectives, policies and rules.
- 14 Carter Group hold significant concerns over the introduction of these heritage areas in general. The Site is located in the "Inner City West HA6" residential heritage area. As is clear from the figure above, the majority of the Site (and we would argue a large proportion of the heritage area itself) holds no heritage values whatsoever. It is therefore perplexing why these areas have been identified in this new overlay.
- 15 Carter Group further note that the Heritage Report and Site Record Forms for 'HA6 Inner City West' prepared by Dr Ann McEwan (Appendix 12 to the section 32 report) records the 32 Armagh Street as a vacant lot with its contribution to the heritage area being 'intrusive'. The Blue Cottage is recorded as being located on 325 Montreal Street with its contribution to the heritage area being 'defining'. However, the proposed contributions map (proposed Appendix 9.3.7.8) identifies the whole site, including the vacant lot on 32 Armagh Street, as having a 'defining' contribution. This is wrong and inconsistent with the report prepared by Dr Ann McEwan.
- 16 Carter Group also question the identified contribution of other sites within the "Inner City West HA6" residential heritage area, as the basis for then justifying the identification of a residential heritage area. By way of example, the YMCA Christchurch site occupies a substantial area and is assessed as making a 'defining' contribution to the proposed "Inner City West HA6" residential heritage area, despite featuring modern and partially-constructed multi-level commercial buildings of no apparent heritage merit. Other sites within the heritage area are also of questionable merit in terms of their contribution.

- 17 Carter Group are concerned about these errors, and the risk that errors such as these might be systemic throughout PC13. Given the strict regulations on development PC13 proposes, it is essential to ensure the provisions are accurate and justified. The heritage listings and corresponding rules within the District Plan currently recognise and provide for the protection of historic heritage from inappropriate subdivision, use and development.
- 18 A number of the proposed heritage areas overlap with character areas already identified in the District Plan. It is not entirely clear why both of these overlays are required to protect historic heritage. The addition of a residential heritage area overlay will add unnecessary complexity and duplication in the interpretation of the District Plan.
- 19 Carter Group note that through the hearings on the proposed Christchurch District Plan, the Independent Hearings Panel determined that there was no basis to retain rules controlling development on sites adjacent to heritage items or settings in order to satisfy section 6(f) of the RMA. For the same reasons, it follows that the proposed provisions for Residential Heritage Areas, and the related 'Interface Sites' is not warranted.
- 20 The Site's identification within a heritage area is strongly opposed by the Carter Group, who seek that:
- 20.1 the heritage areas in general (maps and associated provisions) are removed from PC13; or
 - 20.2 the proposed "Inner City West HA6" residential heritage area is removed from PC13; or
 - 20.3 at the very least, the Site be removed from the proposed "Inner City West HA6" residential heritage area.
- The New Regent Street heritage setting**
- 21 Carter Group oppose the extent of the heritage setting for New Regent Street (being heritage setting 336 associated with heritage item 404 in Appendix 9.3.7.2 schedule).
- 22 Carter Group oppose the identification of this heritage setting to the northern most edge of Armagh Street and consider the setting should end at the southern most edge of Armagh Street, being where New Regent Street meets Armagh Street. Among other reasons, Carter Group consider that the modern buildings fronting Armagh Street at either end of New Regent Street or the Armagh Street road reserve have no apparent heritage values that warrant a heritage setting.

- 23 There is no basis for why this heritage setting extends as far as it does.

Central City Heritage Interface

- 24 Carter Group have interests in the land bounded by Oxford Terrace, Manchester Street, Armagh Street, and Colombo Street as shown below:



Figure 2: Approximate outline of site in yellow

- 25 Part of this site is subject to the proposed 'Central City Heritage Interface' overlay. This overlay is strongly opposed by the Carter Group. Carter Group considers there is no basis or justification for such an overlay over the Site. Among other reasons, Carter Group notes that the site has no identified heritage values and is surrounded by roads, that provide an adequate interface to and separation from other sites in the area, including those which may have heritage value.
- 26 It is also unclear why there are no objectives or policies introduced by PC13 in respect of these heritage interface sites. This gives very little direction to plan users as to their utility and/or relevance.
- 27 On this basis, Carter Group therefore seek:
- 27.1 the heritage interface overlays in general (maps and any associated provisions) are removed from PC13; or

27.2 the Central City Heritage Interface relating to New Regent Street is removed;
or

27.3 at the very least, the Central City Heritage Interface is removed from the
above site.

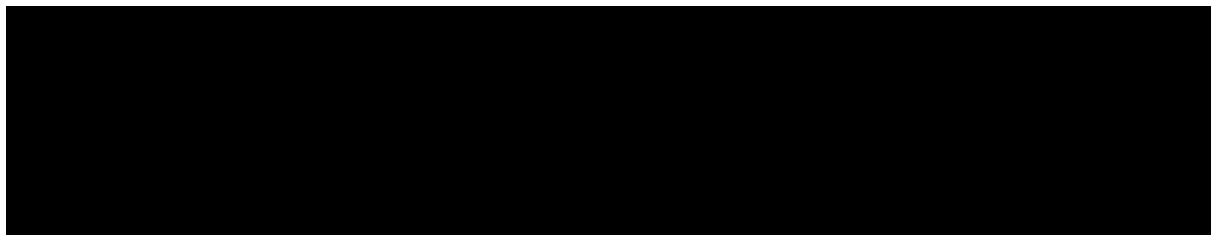
Signed for and on behalf of Carter Group Limited by its solicitors and authorised agents
Chapman Tripp



Jo Appleyard
Partner
12 May 2023

Address for service of submitter:

Carter Group Limited
c/- Jo Appleyard / Lucy Forrester
Chapman Tripp



APPENDIX 1

No.	Provision	Position	Submission	Relief Sought
1	Definition of 'Alteration'	Oppose	The definition has the effect of meaning that any change, modification or addition to a heritage item, heritage setting or heritage fabric, or a building in a heritage area will constitute an 'alteration' and trigger corresponding rules and consent requirements, irrespective of whether it impacts on heritage fabric. This will create unnecessary, costly and inefficient consent requirements, and provide no benefits in respective of heritage.	Retain status quo.
2	Definition of 'Contributory building'	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Regardless, the proposed definition is vague and provides little certainty as to whether buildings would or would not constitute a contributory building.	Delete.
3	Definition of 'Defining building'	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Regardless, the proposed definition is vague and provides little certainty as to whether buildings would or would not constitute a defining building.	Delete.

No.	Provision	Position	Submission	Relief Sought
4	Definition of 'Demolition'	Oppose	The amended definition has the effect of meaning that any destruction of a non-substantial part of a building constitutes 'demolition' and triggers corresponding rules and consent requirements. This will create unnecessary, costly and inefficient consent requirements for inconsequential partial demolition work, create conflict with the definition of 'alteration', and provide no benefits in respect of heritage.	Retain status quo.
5	Definition of 'Heritage setting'	Oppose	The amended definition removes the wording that a setting <i>'together with the associated heritage item, has met the significance threshold'</i> and instead states that <i>'Heritage settings have not been assessed as meeting the significance threshold for scheduling'</i> . The submitter considers that heritage settings that do not meet the significance threshold for scheduling should not be listed, with associated regulatory requirements.	Retain status quo.
6	Definition of 'Heritage Building Code works'	Supports	The amended definition provides greater clarity and certainty, and sensibly provides for insulation and glazing upgrades.	Retain as proposed.
7	Definition of 'Intrusive building or site'	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission.	Delete.

No.	Provision	Position	Submission	Relief Sought
			Regardless, the proposed definition is vague and provides little certainty as to whether buildings or sites would or would not be intrusive.	
8	Definition of 'Neutral building or site'	Oppose	<p>Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission.</p> <p>Regardless, the proposed definition is vague and provides little certainty as to whether buildings or sites would or would not be categorised as neutral.</p>	Delete.
9	Definition of 'Reconstruction'	Supports	The amended definition provides greater clarity and certainty, and sensibly provides for additional forms of reconstruction.	Retain as proposed.
10	Definition of 'Relocation'	Oppose	<p>Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. As such, the submitter opposes the definition of relocation insofar that it relates to heritage areas.</p> <p>Further, the submitter opposes the deletion of the exclusions in (a) and (b) that otherwise sensibly exclude temporary relocation or realignment works.</p>	Retain status quo.

No.	Provision	Position	Submission	Relief Sought
11	Definition of 'Repairs'	Supports	The amended definition provides greater clarity and certainty, and sensibly provides for additional forms of repairs.	Retain as proposed.
12	Definition of 'Restoration'	Supports	The amended definition provides greater clarity and certainty.	Retain as proposed.
13	8.6.1 Minimum net site area	Oppose	<p>Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission.</p> <p>Further, the proposed 450m2 minimum net site area is opposed on the basis that it conflicts with the objectives in the NPS-UD and District Plan to provide for the most intensive and efficient scale and form of development within Central City areas.</p>	Delete.
14	8.9 Rules- Earthworks	Support	The amended provisions in rule 8.9 are generally appropriate.	Retain as proposed.
15	Policy 9.3.2.2.2 Identification, assessment and scheduling of heritage areas	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission.	Delete.

No.	Provision	Position	Submission	Relief Sought
16	Policy 9.3.2.2.3 - Management of scheduled historic heritage	Oppose	<p>Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission.</p> <p>The amendments to clause (b) of this policy are also opposed. The operative wording within this policy sensibly recognises that Significant (Group 2) heritage items are potentially capable of accommodating a greater degree of change than Highly Significant (Group 1) heritage items.</p>	Retain status quo.
17	Policy 9.3.2.2.5 Ongoing use of scheduled historic heritage	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, the changes to this policy are opposed.	Retain status quo.
18	Policy 9.3.2.2.8- Demolition of scheduled historic heritage	Oppose	<p>Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, the changes to clause (a) of this policy are opposed.</p> <p>In addition, the changes to clause (a)(ii) are opposed insofar that they introduce a new 'test' for evaluating the demolition of historic heritage that presents an unreasonable and inappropriate threshold that materially changes and undermines the policy. By way of example, the proposed wording may preclude the demolition of heritage items that are</p>	Retain status quo.

No.	Provision	Position	Submission	Relief Sought
			significantly (physically) compromised, on the basis of one or more (non-physical) heritage values (e.g. historical/social or cultural/spiritual value) remaining.	
19	Rule 9.3.3 How to interpret and apply the rules	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, the changes to this rule, insofar that they relate to heritage areas are opposed.	Delete all references to heritage areas.
20	9.3.4 Rules- Historic heritage	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, changes to this rule, insofar as they relate to heritage areas are opposed.	Delete all references to heritage areas within rule 9.3.4, including (and in particular) rules RD6-RD8.
21	Matters of discretion 9.3.6.1(a)	Oppose	The submitter opposes the deletion of clause (a), given that damage incurred as a result of the Canterbury earthquakes of 2010 and 2011 including the costs of repair and reconstruction, remains a relevant matter for consideration.	Retain status quo for 9.3.6.1(a).
22	Matters of discretion 9.3.6.1(p)	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, the matters under clause (p) are opposed.	Delete proposed 9.3.6.1(p).

No.	Provision	Position	Submission	Relief Sought
23	Matters of discretion 9.3.6.4	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, the matters in rule 9.3.6.4 are opposed.	Delete proposed rule 9.3.6.4.
24	Matters of discretion 9.3.6.5	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, the matters in rule 9.3.6.5 are opposed.	Delete proposed rule 9.3.6.5.
25	Matters of discretion 9.3.6.6	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, the matters in rule 9.3.6.6 are opposed.	Delete proposed rule 9.3.6.6.
26	Appendix 9.3.7.2 Schedule of Significant Historic Heritage Items	Oppose	For the reasons stated in the covering submission, the listing of the item and setting at 32 Armagh Street (and 325 Montreal Street) is inappropriate. Accordingly, this listing should be deleted.	Delete Heritage Item 390 and Heritage Setting 287 regarding 32 Armagh Street from Appendix 9.3.7.2.
27	Appendix 9.3.7.3	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the	Retain status quo.

No.	Provision	Position	Submission	Relief Sought
	Schedule of Significant Historic Heritage Areas		covering submission. Accordingly, the changes to this schedule are opposed.	
28	Appendix 9.3.7.4 Heritage item and heritage setting exemptions	Oppose	The exemptions provided in Appendix 9.3.7.4 are an important tool for incentivising the adaptive reuse and ongoing protection of heritage items. As such, the amendments proposed to this appendix which reduce the extent of exemptions is inconsistent with the Plan's objectives in relation to heritage and section 6 of the Act.	Retain the status quo.
29	Appendix 9.3.7.7 – Residential Heritage Areas - Aerial Maps	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, Appendix 9.3.7.7 should be deleted.	Delete.
30	Appendix 9.3.7.8 – Residential Heritage Areas – Site Contributions Maps	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, Appendix 9.3.7.8 should be deleted.	Delete.
31	Appendix 9.3.7.9 – Residential	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the	Delete.

No.	Provision	Position	Submission	Relief Sought
	Heritage Areas – Interface Sites and Character Area Overlay Maps		covering submission. Accordingly, Appendix 9.3.7.9 should be deleted.	
32	Rule 14.5.3.1.3 Area-specific restricted discretionary activities	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, Rule 14.5.3.1.3 should be deleted.	Delete.
33	Rule 14.5.3.2 Area-specific built form standards	Oppose	Heritage areas (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, Rule 14.5.3.2 should be deleted.	Delete.
34	Rule 15.11.1.3 Restricted discretionary activities	Oppose	<p>It is assumed that the reference to the “Central City Heritage Qualifying Matter and Precinct” is a reference to the ‘Central City Heritage Interface’ overlay shown on the planning maps, although this is not clear.</p> <p>The heritage interfaces (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, Rule 15.11.1.3 should be deleted.</p>	Delete.

No.	Provision	Position	Submission	Relief Sought
35	Rule 15.11.2.11 Building Height	Oppose	<p>It is assumed that the reference to the "Central City Heritage Qualifying Matter and Precinct" is a reference to the 'Central City Heritage Interface' overlay shown on the planning maps, although this is not clear.</p> <p>The heritage interfaces (and associated provisions) are generally opposed for the reasons stated in the covering submission. Accordingly, Rule 15.11.2.11 should be deleted.</p>	Delete

Our proposed Housing and Business Choice and Heritage Plan Changes (13 &14)

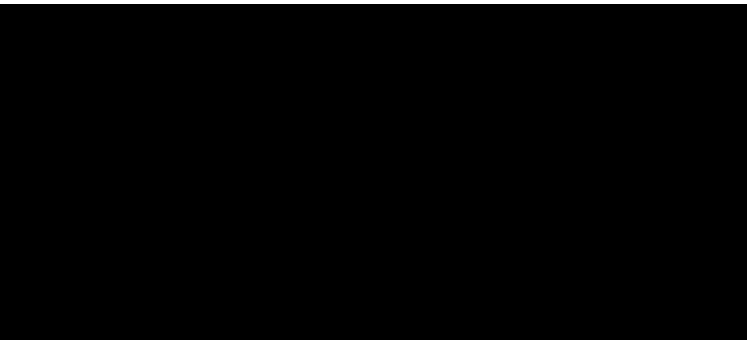
Submitter Details

Submission Date: 12/05/2023

First name: Jo **Last name:** Appleyard

Organisation: Church Property Trustess

Preferred method of contact Email



Daytime Phone:

I could not
Gain an advantage in trade competition through this submission

I am not
directly affected by an effect of the subject matter of the submission that :
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Would you like to present your submission in person at a hearing?

- ☒ Yes
- ☐ I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Additional requirements for hearing:

Attached Documents

File

PC14 Submission - Church Property Trustees 3457-4784-5667

Form 5

SUBMISSION ON PUBLICLY NOTIFIED PROPOSAL FOR POLICY STATEMENT OR PLAN, CHANGE OR VARIATION

Clause 6 of Schedule 1, Resource Management Act 1991

To Christchurch City Council

Name of submitter: Church Property Trustees (CPT)

- 1 This is a submission on the proposed Plan Change 14 (PC14) to the Christchurch District Plan (the *District Plan*).
- 2 CPT could not gain an advantage in trade competition through this submission.
- 3 CPT's submission relates to the whole of PC14. The specific relief sought by CPT is set out at **Appendix 1** and elaborated on below.
- 4 CPT wishes to be heard in support of the submission.
- 5 If others make a similar submission, CPT will consider presenting a joint case with them at a hearing.

The St James Church

- 6 CPT owns land at 65 Riccarton Road (the *Site*), this is held on behalf of the Anglican Diocese of Christchurch (the *Diocese*). The Site houses the St James Church (the *Church*). The Church is listed as a 'Highly Significant' heritage item (heritage item number 465), within a heritage setting (heritage setting number 220) in the District Plan:

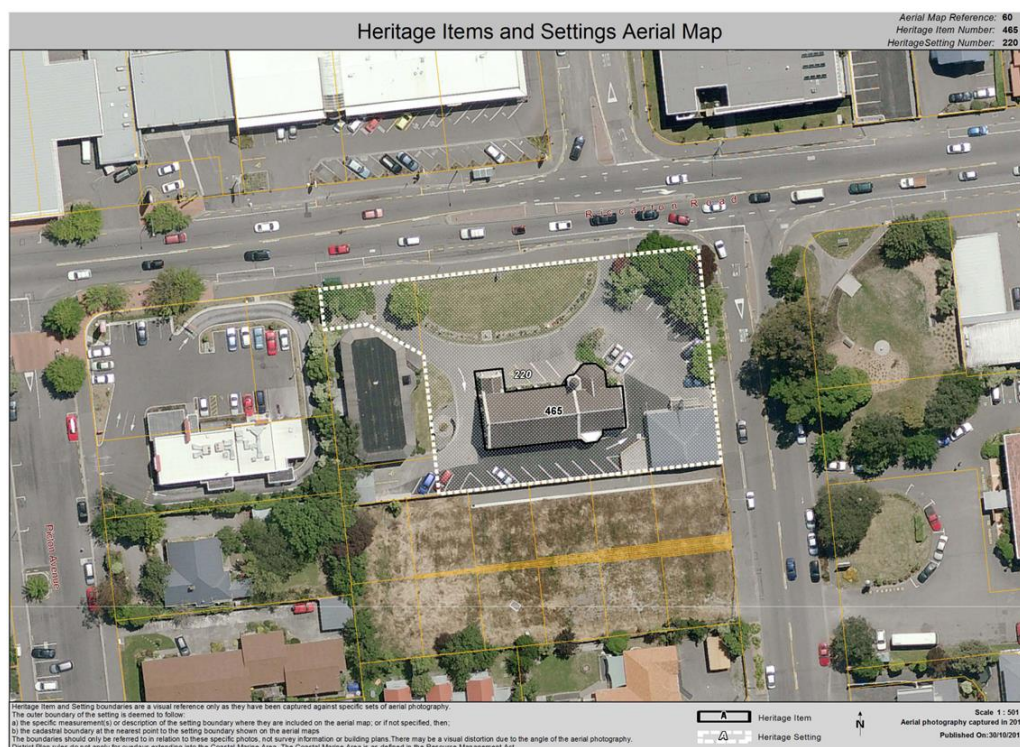


Figure 1: The heritage item and setting on the Site, Heritage Items and Settings Aerial Map, Appendix 9.3.7.7 Christchurch District Plan.

- 7 The Church was badly damaged during the Canterbury earthquakes and was listed as an Earthquake Prone Building having an NBS of less than 20% on 27 May 2019. The Church is currently in an extremely poor state of repair, and lacks the structural integrity required for its safe usage.
- 8 The Diocese continues to respond to changing demographics in the way it operates and the infrastructure required. In Christchurch this has included re-focussing the centres of operation for some parishes as a critical aspect of its core activities.
- 9 Notably, the Riccarton parish merged with the Spreydon parish a number of years ago. The Diocese therefore has no use for the Church, the Site itself is redundant and surplus to the Diocese's uses.
- 10 CPT hold a wide range of heritage assets throughout the City on behalf of the Diocese. It is one of the largest (if not the largest) private heritage owners in the South Island. Almost all of its heritage assets have been restored to better than pre-earthquake levels.
- 11 CPT have investigated in depth the feasibility of reinstating the Church, however, none of the options are economically viable for the Diocese. The Diocese has also investigated the sale of the Site to developers who might otherwise wish to reinstate the Church themselves. CPT's resounding feedback from these market enquiries was that purchasers were reluctant to take on the risk of an extremely low NBS building, and the uncertainty around future use and potential cost of repair.
- 12 CPT consider that the Church would be appropriate to demolish, having regard to the matters listed in Policy 9.3.2.2.8 which provides (as amended by PC14):

9.3.2.2.8 Policy – Demolition of scheduled historic heritage of heritage items

a. When considering the appropriateness of the demolition of a heritage item scheduled in Appendix 9.3.7.2 or a defining building or contributory building in a heritage area scheduled in Appendix 9.3.7.3, have regard to the following matters:

i. whether there is a threat to life and/or property for which interim protection measures would not remove that threat;

ii. whether the extent of the work required to retain and/or repair the heritage item or building is of such a scale that the heritage values and integrity of the heritage item or building would be significantly compromised, and the heritage item would no longer meet the criteria for scheduling in Policy 9.3.2.2.1.

iii. whether the costs to retain the heritage item or building (particularly as a result of damage) would be unreasonable;

iv. the ability to retain the overall heritage values and significance of the heritage item or building through a reduced degree of demolition; and

v. the level of significance of the heritage item.

- 13 CPT consider that the Church's heritage status is considerably diminished given its current state of disrepair and it no longer meets the criteria for listing. CPT therefore seeks that:

- 13.1 The Church's heritage item (heritage item number 465) and heritage setting (heritage setting number 220) be removed from the Schedule of Significant Historic Heritage in Appendix 9.3.7.2 of the District Plan.

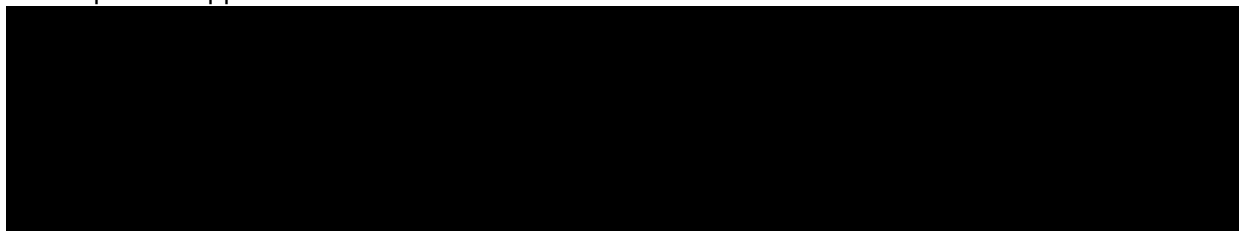
Signed for and on behalf of Church Property Trustees by its solicitors and authorised agents Chapman Tripp



Jo Appleyard
Partner
12 May 2023

Address for service of submitter:

Church Property Trustees
c/- Jo Appleyard / Lucy Forrester
Chapman Tripp



APPENDIX 1

No.	Provision	Position	Submission	Relief Sought
1	Definition of 'Alteration'	Oppose	The definition has the effect of meaning that any change, modification or addition to a heritage item, heritage setting or heritage fabric, or a building in a heritage area will constitute an 'alteration' and trigger corresponding rules and consent requirements, irrespective of whether it impacts on heritage fabric. This will create unnecessary, costly and inefficient consent requirements, and provide no benefits in respective of heritage.	Retain status quo.
2	Definition of 'Demolition'	Oppose	The amended definition has the effect of meaning that any destruction of a non-substantial part of a building constitutes 'demolition' and triggers corresponding rules and consent requirements. This will create unnecessary, costly and inefficient consent requirements for inconsequential partial demolition work, create conflict with the definition of 'alteration', and provide no benefits in respective of heritage.	Retain status quo.
3	Definition of 'Heritage setting'	Oppose	The amended definition removes the wording that a setting <i>'together with the associated heritage item, has met the significance threshold'</i> and instead states that <i>'Heritage settings have not been assessed as meeting the significance threshold for scheduling'</i> . The submitter considers that heritage settings that	Retain status quo.

			do not meet the significance threshold for scheduling should not be listed, with associated regulatory requirements.	
4	Policy 9.3.2.2.8- Demolition of scheduled historic heritage	Oppose	The changes to clause (a)(ii) are opposed insofar that they introduce a new 'test' for evaluating the demolition of historic heritage that presents an unreasonable and inappropriate threshold that materially changes and undermines the policy. By way of example, the proposed wording may preclude the demolition of heritage items that are significantly (physically) compromised, on the basis of one or more (non-physical) heritage values (e.g. historical/social or cultural/spiritual value) remaining.	Retain status quo.
5	Matters of discretion 9.3.6.1(a)	Oppose	The submitter opposes the deletion of clause (a), given that damage incurred as a result of the Canterbury earthquakes of 2010 and 2011 including the costs of repair and reconstruction, remains a relevant matter for consideration.	Retain status quo for 9.3.6.1(a).
6	Appendix 9.3.7.2 Schedule of Significant Historic Heritage Items	Oppose	For the reasons stated in the covering submission, the listing of the item and setting at 65 Riccarton Road is inappropriate. Accordingly, this listing should be deleted.	Delete Heritage Item 465 and Heritage Setting 220 regarding 65 Riccarton Road from Appendix 9.3.7.2.
7	Appendix 9.3.7.4	Oppose	The exemptions provided in Appendix 9.3.7.4 are an important tool for incentivising the	Retain the status quo.

	Heritage item and heritage setting exemptions		adaptive reuse and ongoing protection of heritage items. As such, the amendments proposed to this appendix which reduce the extent of exemptions is inconsistent with the Plan's objectives in relation to heritage and section 6 of the Act.	
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Our proposed Housing and Business Choice and Heritage Plan Changes (13 &14)

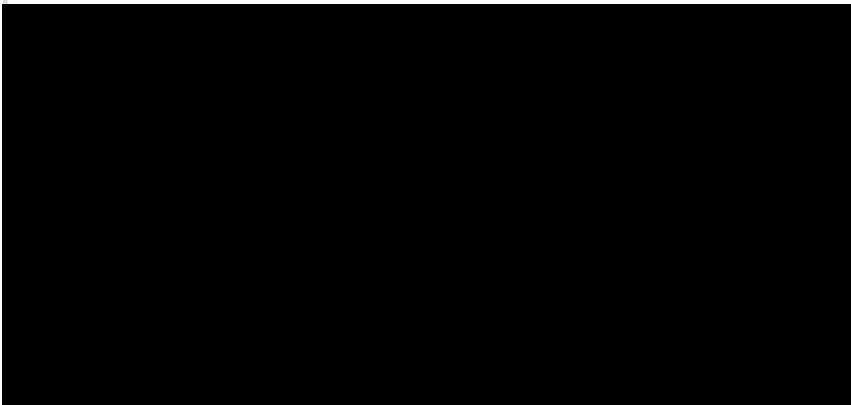
Submitter Details

Submission Date: 12/05/2023

First name: Laura **Last name:** Stewart

Organisation: Daresbury Ltd

Preferred method of contact Email



I could not
Gain an advantage in trade competition through this submission

I am not
directly affected by an effect of the subject matter of the submission that :

a. adversely affects the environment, and

b. does not relate to the trade competition or the effects of trade competitions.

Note to person making submission:

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991

Would you like to present your submission in person at a hearing?

☒ Yes

☐ I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Additional requirements for hearing:

Attached Documents

File

Daresbury Submission Email

Jackson, Andrew

From: Laura Stewart <[REDACTED]>
Sent: Friday, 12 May 2023 4:57 pm
To: Engagement
Cc: Jo Appleyard; Lucy Forrester
Subject: Submission on proposed Housing and Business Choice Plan Change (PC14)
Attachments: PC14 Submission - Daresbury Limited.pdf

Good afternoon,
Please find **attached** submission on behalf of Daresbury Limited in relation to PC14.
Ngā mihi | Kind regards

LAURA STEWART (she/her)

LEGAL ADMINISTRATOR

Chapman Tripp



Disclaimer

This email is intended solely for the use of the addressee and may contain information that is confidential or subject to legal professional privilege. If you receive this email in error please immediately notify the sender and delete the email.

Form 5**SUBMISSION ON PUBLICLY NOTIFIED PROPOSAL FOR POLICY STATEMENT OR
PLAN, CHANGE OR VARIATION**

Clause 6 of Schedule 1, Resource Management Act 1991

To Christchurch City Council

Name of submitter: Daresbury Limited

- 1 This is a submission on the proposed Heritage Plan Change 14 (*PC14*) to the Christchurch District Plan (the *District Plan*).
- 2 Daresbury Limited could not gain an advantage in trade competition through this submission.
- 3 Daresbury Limited's submission relates to the whole of PC14. The specific relief sought by Daresbury Limited is set out at **Appendix 1** and elaborated on below.
- 4 Daresbury Limited wishes to be heard in support of the submission.
- 5 If others make a similar submission, Daresbury Limited will consider presenting a joint case with them at a hearing.

DARESBUY HOUSE

- 6 Daresbury Limited owns land located within Fendalton Road, Daresbury Lane, and Harakeke Street as shown below:

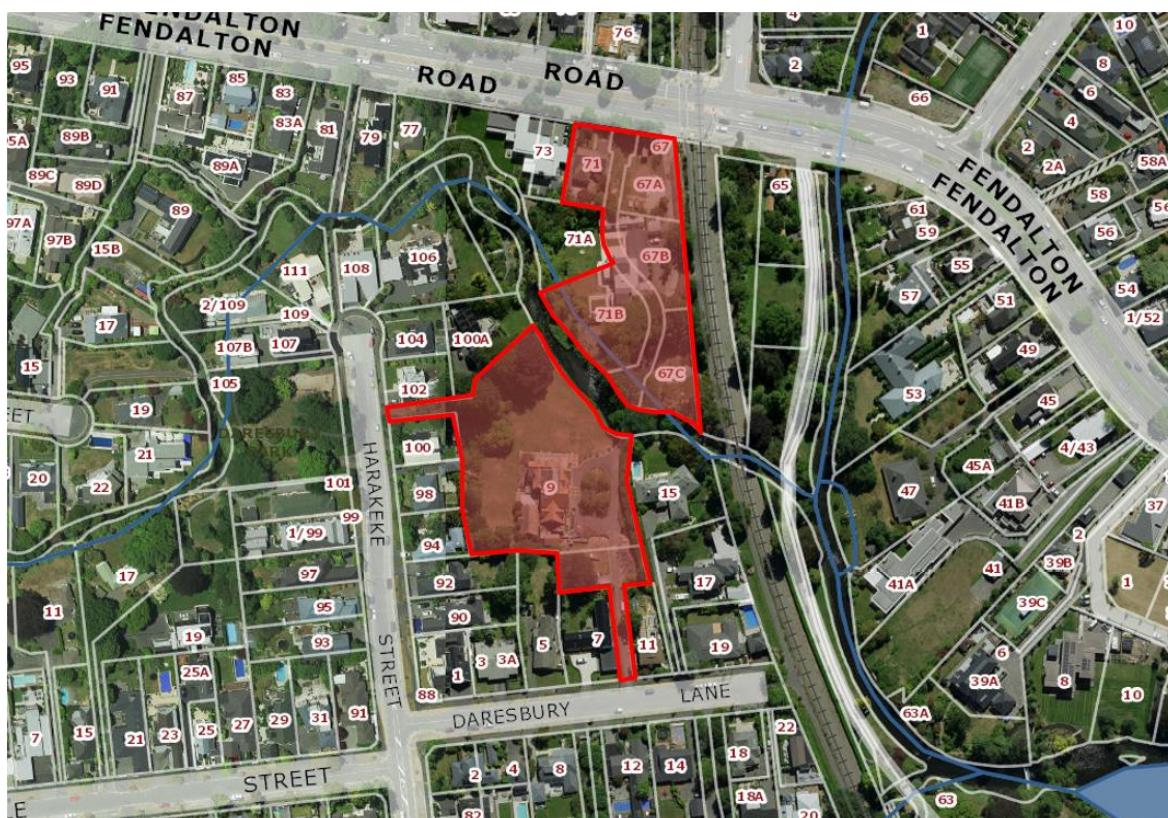


Figure 1: Approximate location of site shown in red

Heritage items and settings

- 7 That land is covered by a heritage setting (heritage setting number 602) and includes a heritage item (Daresbury House – heritage item number 185). The extent of the heritage item and setting is shown below:



Figure 2: Map showing location of heritage item 185 and heritage setting 602

- 8 Daresbury House was once a significant heritage homestead but has been heavily damaged by the Canterbury earthquakes and has sat in limbo since 2011.
- 9 Since acquiring the site on an 'as is where is' basis from the previous owner, Daresbury Limited has commissioned detailed engineering, quantity surveying, and heritage reports to examine whether Daresbury House can be economically restored in a manner that is sensitive to its heritage values. The findings of these reports is that first, restoration is simply not economically feasible, and second the extent of such works would result in the loss of significant heritage fabric such that the resultant building would largely constitute a replica rather than an authentic restoration.
- 10 The extensive repair work that would be required to make the building structurally sound effectively requires destruction of the remaining heritage fabric of the

building. The building is dangerous, well below Building Code standards, and is not inhabitable.

- 11 Much of its heritage features are lost. Repairing the building so that it can be viably used and bringing it up to Building Code requirements will result in even further loss of heritage fabric (due to the scale and extent of the structural engineering work needed) and will be so expensive that it is economically unviable. Daresbury House's heritage status is considerably diminished and can no longer be considered significant. This building should no longer be included on the Schedule.
- 12 The heritage setting associated with Daresbury House is extensive – on both the north and south sides of the Waimairi Stream. Subdivision consent has been granted for that land north of the Waimairi Stream, the works associated with the subdivision are now complete and the titles are on the market. As noted above, Daresbury House has been extensively earthquake damaged and no longer has significant heritage values. This heritage setting should therefore be removed in its entirety.
- 13 The scope of PC14 is broad and presents a timely opportunity to review the extent of the schedule of heritage items. Such a review is especially relevant in instances where additional information on individual items has become available following the District Plan Review. The provision of such information is integral to the need to carefully weigh costs and benefits of any proposed regulation (such as scheduling) under s 32 RMA.
- 14 PC14 provides a good opportunity to review the heritage listings in the District Plan, and provide for the removal of some of the listed items so that they may be demolished where appropriate and consistent with Policy 9.3.2.2.8.
- 15 Daresbury Limited therefore seeks that:
 - 15.1 Daresbury House (Heritage Item 185) be removed from the Schedule of Significant Historic Heritage in Appendix 9.3.7.2 of the District Plan; and
 - 15.2 Associated Heritage Setting 602 be removed from the same.

Significant and other trees

- 16 The Site already contains a number of listed individual significant trees in the District Plan. The District Plan already provides a set of provisions for the protection of such trees.
- 17 PC14 proposes to introduce trees identified as 'qualifying matters'. It is understood that for a tree to be a 'qualifying matter' it must be assessed at over 100 years in age. It is not clear why this is also required in addition to its original listing in the District Plan. These provisions are not efficient or effective and the operative provisions managing development in the vicinity of listed trees are considered appropriate, effective and efficient.
- 18 The 'qualifying matter trees' proposed for the Site are opposed. The assessment included in the section 32 report is brief and does not justify the inclusion of this

tree as a qualifying matter tree. Qualifying matters, given their restrictions on development rights of private property, should be thoroughly tested and assessed.

Financial Contributions Policy

- 19 The proposed tree canopy cover and financial contributions provisions are unworkable and unreasonable.
- 20 The provisions are difficult to understand and create considerable uncertainty. For example:
 - 20.1 If trees are retained over and above the 20% cover threshold will a financial credit be provided to the applicant?
 - 20.2 It is not clear who would be qualified to undertake the assessment of the canopy cover.
 - 20.3 The proposed definitions of PC14 introduce the definition of a 'hedge' with specific reference to the tree canopy cover and financial contributions provisions, yet those provisions do not utilise that term.
 - 20.4 If a stormwater basin is heavily planted in native shrubs, should this receive a credit as plants (and not just trees) also provide for carbon sequestration?
 - 20.5 How will the timing of assessment work in relation to consenting processes? For greenfield subdivisions for example, landscape plans are often not completed until after resource consent is issued.
- 21 The canopy cover provisions would be difficult to enforce. If canopy cover is determined as acceptable at the time of resource consent and 10 years or 15 years later one or some of those trees are cut down, who monitors and enforces that requirement? Does Council have the staff resources to maintain that level of monitoring across wide swathes of the city?
- 22 Councils increasingly seek a reduction in reserve areas within greenfield subdivisions, on the basis of ongoing maintenance costs for the Council. It would be very difficult to achieve a 20% of net site area coverage in most greenfield subdivisions, noting that those reserve areas are also required for other purposes such as playground and open grass for play areas, that are incompatible with extensive tree canopy cover.
- 23 The provisions require 20% of the net site area adjacent to road corridors to contain tree cover. Accommodating tree cover typically necessitates wider road corridors. Wider road corridors reduces land available for housing, in direct conflict with the existing District Plan provisions stipulating a minimum density of 15 hh/ha must be achieved for greenfield subdivision areas, and more generally the NPS-UD.
- 24 The cost implications of not achieving tree cover are considerable and, given Daresbury Limited does not consider the 20% cover is achievable, will add further to development costs that are then passed onto purchasers.

- 25 The implications of this proposed policy are significant from an economic perspective and must be adequately justified by the Council. As it stands, Daresbury Limited do not consider the Council has done this and therefore the proposed financial contributions policy should be deleted in its entirety.

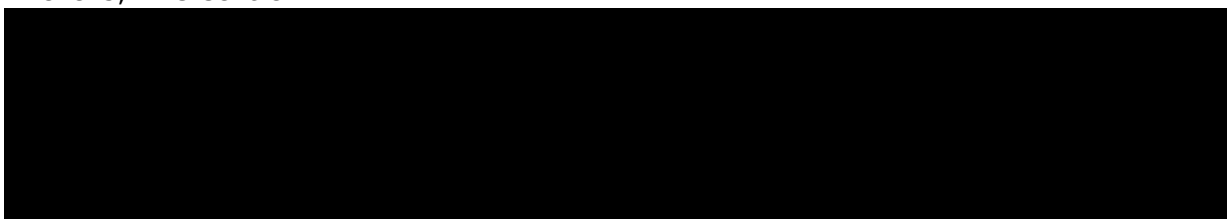
Signed for and on behalf of Daresbury Limited by its solicitors and authorised agents
Chapman Tripp



Jo Appleyard
Partner
12 May 2023

Address for service of submitter:

Daresbury Limited
c/- Jo Appleyard / Lucy Forrester
Chapman Tripp
Level 5, PwC Centre



APPENDIX 1

No.	Provision	Position	Submission	Relief Sought
1	Definition of 'Alteration'	Oppose	The definition has the effect of meaning that any change, modification or addition to a heritage item, heritage setting or heritage fabric, or a building in a heritage area will constitute an 'alteration' and trigger corresponding rules and consent requirements, irrespective of whether it impacts on heritage fabric. This will create unnecessary, costly and inefficient consent requirements, and provide no benefits in respective of heritage.	Retain status quo.
2	Definition of 'Demolition'	Oppose	The amended definition has the effect of meaning that any destruction of a non-substantial part of a building constitutes 'demolition' and triggers corresponding rules and consent requirements. This will create unnecessary, costly and inefficient consent requirements for inconsequential partial demolition work, create conflict with the definition of 'alteration', and provide no benefits in respective of heritage.	Retain status quo.
3	Definition of 'Heritage setting'	Oppose	The amended definition removes the wording that a setting <i>'together with the associated heritage item, has met the significance threshold'</i> and instead states that <i>'Heritage settings have not been assessed as meeting the significance threshold for scheduling'</i> . The submitter considers that heritage settings that	Retain status quo.

			do not meet the significance threshold for scheduling should not be listed, with associated regulatory requirements.	
4	Definition of 'Heritage Building Code works'	Supports	The amended definition provides greater clarity and certainty, and sensibly provides for insulation and glazing upgrades.	Retain as proposed.
5	Definition of 'Reconstruction'	Supports	The amended definition provides greater clarity and certainty, and sensibly provides for additional forms of reconstruction.	Retain as proposed.
6	Definition of 'Relocation'	Oppose	The submitter opposes the deletion of the exclusions in (a) and (b) that otherwise sensibly exclude temporary relocation or realignment works.	Retain status quo.
7	Definition of 'Repairs'	Supports	The amended definition provides greater clarity and certainty, and sensibly provides for additional forms of repairs.	Retain as proposed.
8	Definition of 'Restoration'	Supports	The amended definition provides greater clarity and certainty.	Retain as proposed.
9	8.9 Rules- Earthworks	Support	The amended provisions in rule 8.9 are generally appropriate.	Retain as proposed.
10	Policy 9.3.2.2.3 - Management of scheduled	Oppose	The amendments to clause (a)(ii) of this policy are opposed. This change inappropriately shifts the focus of the plan away from providing for ongoing use and adaptive re-use of heritage items, towards more rigid	Retain status quo.

	historic heritage		<p>preservation and protection. This can have the perverse outcome of preventing the retention of heritage buildings by preventing owners (particularly private owners) from using and maintaining heritage items in ways that are practical and financially feasible.</p> <p>The amendments to clause (b)(i) of this policy are also opposed. The operative wording within this policy sensibly recognises that Significant (Group 2) heritage items are potentially capable of accommodating a greater degree of change than Highly Significant (Group 1) heritage items.</p>	
11	Policy 9.3.2.2.8- Demolition of scheduled historic heritage	Oppose	<p>The changes to clause (a)(ii) are opposed insofar that they introduce a new 'test' for evaluating the demolition of historic heritage that presents an unreasonable and inappropriate threshold that materially changes and undermines the policy. By way of example, the proposed wording may preclude the demolition of heritage items that are significantly (physically) compromised, on the basis of one or more (non-physical) heritage values (e.g. historical/social or cultural/spiritual value) remaining.</p>	Retain status quo.
12	Rule 9.3.4.1.1 (P9/8) Permitted activities	Oppose	<p>The deletion of P9 is opposed. There are many heritage buildings in Christchurch which are still in a state of disrepair and are significantly damaged as a result of the Canterbury earthquakes. It is premature to</p>	Retain status quo.

			remove these rules and standards, which sensibly provide specific guidance for heritage buildings that have been earthquake-damaged.	
13	Matters of discretion 9.3.6.1(a)	Oppose	<p>The submitter opposes the deletion of clause (a), given that damage incurred as a result of the Canterbury earthquakes of 2010 and 2011 including the costs of repair and reconstruction, remains a relevant matter for consideration.</p> <p>There are many heritage buildings in Christchurch which are still in a state of disrepair and are significantly damaged as a result of the Canterbury earthquakes. It is premature to remove these rules and standards, which sensibly provide specific guidance for heritage buildings that have been earthquake-damaged.</p>	Retain status quo for 9.3.6.1(a).
14	Appendix 9.3.7.2 Schedule of Significant Historic Heritage Items	Oppose	For the reasons stated in the covering submission, the listing of Daresbury House (heritage item 185) and associated setting (heritage setting 602) is inappropriate. Accordingly, this listing should be deleted.	Delete Heritage Item 185 and Heritage Setting 602 regarding Daresbury House from Appendix 9.3.7.2.
15	Appendix 9.3.7.4 Heritage item and heritage	Oppose	The exemptions provided in Appendix 9.3.7.4 are an important tool for incentivising the adaptive reuse and ongoing protection of heritage items. As such, the amendments	Retain the status quo.

	setting exemptions		proposed to this appendix which reduce the extent of exemptions is inconsistent with the Plan's objectives in relation to heritage and section 6 of the Act.	
16	Objective 3.3.10(ii)(E)	Oppose	<p>Consistent with its submissions on sub chapter 6.10A, the submitter considers the provisions relating to tree canopy cover and financial contributions in their entirety are unworkable and onerous.</p> <p>The submitter further notes, that if the Council are wanting to enhance and grow the City's biodiversity and amenity this should also go hand in hand with Council agreeing to accept larger and more frequent recreational reserve areas. Over the past 5 – 7 years Council have pushed back against numerous developer proposals to increase reserve areas which would assist in meeting these proposed objectives.</p>	Delete.
17	General/all Sub Chapter 6.10A Tree Canopy Cover and Financial Contributions	Oppose	The provisions in their entirety concerning tree canopy cover and financial contributions (including related definitions and amendments to strategic objectives) are unworkable and onerous.	Delete all of the financial contributions draft provisions in their entirety.
18	6.10A.1	Oppose	The provision begs the question: If trees are retained over and above the 20% cover	

			threshold will a financial credit be provided to the applicant?	
19	6.10A.1c	Oppose	<p>Greenfield subdivision does not generally cause the loss of tree canopy cover, there is generally a net gain in canopy cover as such subdivision is typically over open paddocks.</p> <p>Furthermore, Council itself has been responsible for a reduced canopy cover through the adoption of policies of density, road widths, off-sets from infrastructure, reduction in reserves to vest, all based around maintenance obligations and council budgets.</p>	
20	6.10A.1d	Oppose	<p>There is currently no "Urban Forest Plan" setting out the Council target. Therefore, how is anyone expected to know if this is even realistic?</p> <p>This section also refers to financial contributions to cover the cost of tree pits construction within road corridors. This should exclude Greenfield sites where developers are already required as part of their subdivision consent to include street trees within new road corridors.</p>	
21	Objective 6.10A.2.1	Oppose	<p>For the reasons expressed in the submission points above, the objective is generally opposed.</p> <p>Otherwise, the objective fails to account for the particular characteristics of residential activity, its location or other contextual matters that</p>	

			may make this objective unachievable or inappropriate. For example, residential activities within multi-level apartment buildings in the core of the Central City could not practicably '[maintain] <i>existing trees and/or</i> [plant] <i>new trees as part of the development</i> ', as required by the objective.	
22	Policy 6.10A.2.1.1	Oppose	For the same reasons expressed in regards Objective 6.10A.2.1 and otherwise noting the practical difficulties of monitoring and enforcing the tree canopy percentages over time, this policy is opposed.	
23	Policy 6.10A.2.1.2	Oppose	For the same reasons expressed in regards to the submission points above, the policy is opposed. Among other things, the maintenance of required tree canopy is impractical to monitor and enforce and requiring financial contributions from those who do not meet the requirements but not from those who may provide the canopy and subsequently remove it. This policy is inequitable and unworkable.	
24	Policy 6.10A.2.1.3	Oppose	The requirements for tree planting (in terms of location, soil volume, etc) are unnecessarily and unreasonably prescriptive and remove property owners' reasonable freedom and choice to landscape their properties as they choose. Moreover, such requirements are difficult to monitor and enforce on an ongoing basis (e.g. as new owners or tenants choose to	

			<p>re-landscape) and are unnecessary accounting for the control or discretion in regards to these matters where trees are expressly required through resource consent processes.</p> <p>Consent notices in respect of tree planting are an unreasonable and onerous requirement, and are considered impracticable for enforcing residential landscaping which is commonly and regularly altered to reflect changing needs and preferences over time. Consent notices are likely to be overlooked or ignored, or impose costly and inefficient regulatory processes to retrospectively address landscaping works in breach of consent notices.</p> <p>Policies relating to trees in road reserve are unnecessary, noting that such trees can be adequately managed by Council in its capacity as road controlling authority.</p>	
25	6.10A.3	Oppose	<p>The provisions in this section are generally opposed. Further, clause (c) is considered unclear, insofar as providing 'guidance' on tree species and other 'requirements' and whether these external documents will essentially be imposed as rules.</p>	
26	6.10A.4	Oppose	<p>The rules are opposed in their entirety for the reasons expressed above.</p>	
27	6.10A.4(a)	Oppose	<p>The explanatory note setting out the application of the rules is arbitrary, unclear and open to interpretation. Among other concerns,</p>	

			it requires a judgement of whether subdivision or development is 'able to contain a ground floor residential unit' irrespective of whether that is proposed, commercially viable, or otherwise.	
28	6.10.A.4.1	Oppose	<p>The rules are opposed in their entirety for the reasons expressed above and noting they are arbitrary, unclear and open to interpretation.</p> <p>Among other concerns, the rules apply to 'any residential development except for extensions or accessory buildings...', which might capture non-built improvements (as residential development), such as hard or soft landscaping works, internal alterations, first floor additions, etc.</p>	
29	6.10.A.4.2	Oppose	<p>The rules are opposed in their entirety for the reasons expressed above and noting they are arbitrary, unclear and open to interpretation and debate. Aside from the monetary costs imposed by the rule, the administration of the rule imposes significant costs insofar as it requires an independent registered valuation.</p> <p>The rules are clearly in conflict with strategic objective 3.3.2.</p>	
30	6.10.A.4.2.3	Oppose	Consent notices in respect of tree planting are an unreasonable and onerous requirement, and are considered impracticable for enforcing residential landscaping which is commonly and regularly altered to reflect changing needs and	

			preferences over time. Consent notices are likely to be overlooked or ignored, or impose costly and inefficient regulatory processes to retrospectively address landscaping works in breach of consent notices.	
31	Rule 8.3.3 (b) financial contributions	Oppose	For the reasons expressed in further detail in the submitter's submissions on subchapter 6.10A, these provisions are opposed in their entirety.	Delete.
32	General / all - Sub Chapter 9.4 Significant and Other Trees Including: 9.4.1 (c) Introduction; Policy 9.4.2.2.3 Tree Protection; 9.4.3(a) & (f) how to interpret and apply the rules; and 9.4.4. Rules	Oppose	The submitter opposes the identification of selected scheduled trees as qualifying matters. The operative provisions relating to scheduled trees provide sufficient protection for such trees (including development buffers) and the presence of trees need not preclude more intensive forms of development.	Delete.

Details of submitter No: 1083 - Jo Appleyard

Submitter:	Jo Appleyard
Submitter Address:	
Behalf of:	Lyttelton Port Company Limited

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 17/05/2023

First name: Jo

Last name: Appleyard

Organisation: Lyttelton Port Company Limited

Postal address:

Email:


Daytime Phone:

Would you like to present your submission in person at a hearing?

Yes

Additional requirements for hearing:

Attached Documents

Name	
LPC submission on PC13 (002)	

Form 5**SUBMISSION ON PUBLICLY NOTIFIED PROPOSAL FOR POLICY STATEMENT OR
PLAN, CHANGE OR VARIATION***Clause 6 of Schedule 1, Resource Management Act 1991***To** Christchurch City CouncilName of submitter: Lyttelton Port Company Limited (*LPC*)

- 1 This is a submission on the proposed Heritage Plan Change to the Christchurch District Plan (*PC13*).
- 2 LPC could not gain an advantage in trade competition through this submission.
- 3 The specific provisions of PC13 that LPC's submission relates to and the general and specific reasons for LPC's submission are set out in **Appendix 1**.
- 4 LPC seeks the following decisions from the Hearings Panel on behalf of Christchurch City Council:
 - 4.1 Grant the relief as set out in **Appendix 1**; and
 - 4.2 Grant any other similar or consequential relief that would address LPC's concerns set out in this submission.
- 5 LPC wishes to be heard in support of the submission.
- 6 If others make a similar submission, LPC will consider presenting a joint case with them at a hearing.

Signed for and on behalf of Lyttelton Port Company Limited by its solicitors and authorised agents Chapman Tripp


Jo Appleyard
Partner
12 May 2023

Address for service of submitter:

Lyttelton Port Company Limited
c/- Annabelle Lee
Chapman Tripp
Level 5, PwC Centre



APPENDIX 1: LPC SUBMISSION ON PC13

- 1 Lyttelton Port Company Limited (*LPC*) welcomes the opportunity to submit on the proposed Heritage Plan Change to the Christchurch District Plan (*PC13*).
- 2 LPC also notes and appreciates the consultation undertaken by Christchurch City Council (*CCC*) in its preparation of PC13.
- 3 Lyttelton Port of Christchurch (*Lyttelton Port*) is the South Island's major deep-water Port and is New Zealand's third largest container terminal by volume, after Port of Tauranga and Ports of Auckland.
- 4 Lyttelton Port is the primary international gateway for the South Island, with Christchurch being the major distribution centre for inbound goods. Export customers include a wide variety of dairy, meat, forestry, horticultural, and manufacturing businesses, as well as coal which is an important export for the west coast region.
- 5 Of relevance to PC13, the whole of Lyttelton township is identified as containing heritage values through the Lyttelton Residential Heritage Area (*LRHA*).¹ LPC supports the spatial extent of the LRHA as notified.
- 6 It is noted that the LRHA explicitly excludes Lyttelton Port and non-residential land. LPC supports this exclusion given existing Port infrastructure is largely modern in nature. Furthermore, there is a functional and operational need for certain structures in certain locations and LPC must be able to operate, maintain and upgrade Port infrastructure, as nationally significant infrastructure. It would be inappropriate for such infrastructure to be subject to the planning framework applicable to heritage items.

¹ As identified in the proposed Appendices 9.3.7.7.6, 9.3.7.8.6 and 9.3.7.9.6.

Our proposed Housing and Business Choice and Heritage Plan Changes (13 & 14)

Submitter Details

Submission Date: 12/05/2023

First name: Jeff **Last name:** Smith

Preferred method of contact Email

Daytime Phone:

I could not
Gain an advantage in trade competition through this submission

I am not
directly affected by an effect of the subject matter of the submission that :
a. adversely affects the environment, and
b. does not relate to the trade competition or the effects of trade competitions.

Note to person making submission:

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991

Would you like to present your submission in person at a hearing?

- ☒ Yes
- ☐ I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Additional requirements for hearing:

Attached Documents

File

CCC PC13 and PC14 submission final

May 2023

Mark Stevenson
Manager Planning, City Planning
Christchurch City Council
PO Box 7302
Christchurch 8154
New Zealand

By email: planchange@ccc.govt.nz

Dear Mark,

Canterbury Regional Council (CRC) appreciates the opportunity to provide feedback on proposed Plan Changes 13 and 14 to the Christchurch District Plan. We wish to acknowledge the work that Christchurch City Council (CCC) has done in preparing the updated proposed changes and thank you for meeting with us to clarify how the proposed changes will work.

CRC has considered each of the updated proposed plan changes against the provisions of the Canterbury Regional Policy Statement (CRPS), in the context of the National Policy Statement on Urban Development 2020, and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021.

Our submission on each of the updated proposed plan changes is set out below.

For any clarification on our submission, please contact our planning team, (regional.planning@ecan.govt.nz) and they will be happy to assist.

Yours sincerely,



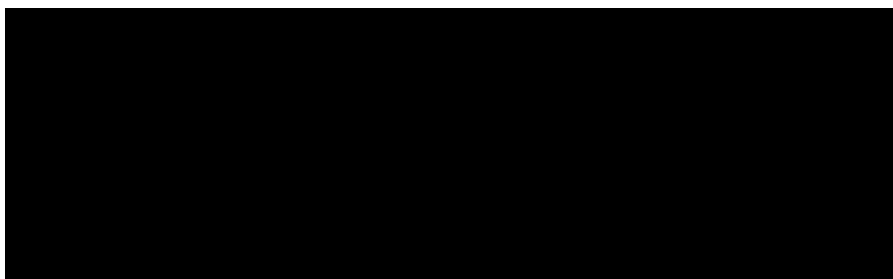
Jeff Smith
Team leader Strategy and Planning

Notice of Submission on Proposed Plan Changes 13 and 14 to the Christchurch District Plan

Submission made by electronic means

1. SUBMITTER DETAILS

Name of Submitter: Canterbury Regional Council (CRC)



My Address for service for receiving documents and communication about this application is: by email

2. SUBMISSION DETAILS

This is a submission on proposed plan changes 13 and 14 to the Christchurch District Plan.

We submit in support of proposed plan change 13, and in support in part of proposed plan change 14.

Environment Canterbury could not gain an advantage in trade competition through this submission.

The reasons for our submission are:

Outlined in the attached submission.

The decision we would like the Council to make is

Outlined in the attached submission.

3. SUBMISSION AT THE HEARING

We do wish to be heard in support of our submission.

4. SIGNATURE

Team Leader Planning & Strategy [date]

[name]

Submission on Proposed Heritage Plan Change (PC13)

CRC supports in principle the introduction of Residential Heritage Areas and considers that these areas will contribute to the protection of the Christchurch's heritage and character.

Overall, we consider that the further listing of heritage buildings, items, settings, and areas, as well as amendments to provisions, will help to protect Christchurch's heritage from inappropriate subdivision, use and development, and is consistent with the objectives and policies in the CRPS.

CRC supports in full the following proposed changes to the Christchurch District Plan as they are consistent with the CRPS and give effect to national direction:

- Abbreviations and Definitions (new and amended)
- Sub-Chapter 9.3 Historic Heritage (amendments)

CRC also supports in full the following proposed changes to the Christchurch District Plan that would affect CRC operations:

- 8.9.3 Exemptions (amendment to a.xii). This amendment is clear and not restrictive.

CRC does not request any changes to the proposed provisions under PC13.

Submission on Draft Housing and Business Choice Plan Change (PC14)

CRC notes that Plan Change 14 (PC14) has been developed as an Intensification Planning Instrument (IPI) which is required to meet the Christchurch City Council's obligations under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021, while also giving effect to provisions in the Canterbury Regional Policy Statement (CRPS) and the National Policy Statement on Urban Development 2020.

CRC notes that proposed Plan Change 14 to the Christchurch District Plan proposes consolidated development and intensification, including commercial activities, within the Central City, Key Activity Centres, and in neighbourhood centres commensurate with their scale and function, core public transport routes, mixed-use areas, and on suitable brownfield land. This is consistent with the CRPS.

CRC considers that the areas identified for intensification will help to reinforce the role of the Central City, KACs and neighbourhood centres as the focal point for commercial activities and higher density development. Further consolidation and intensification will help to reduce the adverse effects of travel, the cost of new infrastructure, and will also reduce the need for further expansion into peripheral areas including Highly Productive Land. CRC therefore generally supports proposed PC14, while identifying some concerns (and suggested amendments) in the tables below.

CRC supports in full the following proposed provisions in the Christchurch District Plan as they are consistent with the CRPS and give effect to national direction:

- Abbreviations and Definitions (new and amended)
- 3.3.3 Objective – Ngāi Tahu mana whenua (amended)
- 3.3.4 Objective – Housing bottom lines and choice (amended with new advice note)
- 3.3.7 Objective – Well-functioning urban environment (new)
- 3.3.8 Objective – Urban growth, form and design (amended)
- 3.3.10 Objective – Natural and cultural environment (with new clause)
- 5.2.2.5.1 Policy – Managing development in Qualifying Matter Coastal Hazard Management Areas (new)
- 5.2.2.5.2 Policy – Managing development within Qualifying Matter Tsunami Management Area (new)
- 6.12.2.1 Objective – Protection of radiocommunication pathway corridors (new)
- 6.12.2.1.1 Policy – Avoidance of physical obstructions – Cashmere/Victoria Park, Sugarloaf and Mt Pleasant (new)
- 7.2.1.2 Policy – High trip generating activities (with new clause)
- 7.2.1.9 Policy – Pedestrian Access (new)
- 8.2.2.2 Policy – Allotments (amended)
- 8.2.2.3 Policy – Identity (amended)
- 8.2.2.7 Policy – Urban density (amended)
- 8.2.3 Objective – Infrastructure and transport (with new clause d)

- 8.2.3.2 Policy – Availability, provision and design of, and connections to, infrastructure (amended and including new clause g)
- Sub-Chapter 9.3 Historic Heritage (amendments)
- 14.2.1 Objective – Housing supply (amended)
- 14.2.1.1 Policy – Housing distribution and density (amended)
- 14.2.1.2 (deleted)
- 14.2.1.3 (deleted)
- 14.2.1.7 Policy – Monitoring (amended)
- 14.2.3 Objective and Policies 14.2.3.1-14.2.3.5 – MDRS objective and policies (new)
- 14.2.3.6 Framework for building heights in medium and high density areas (new)
- 14.2.3.7 Management of increased building heights (new)
- 14.2.3.8 Policy – Firefighting water capacity (new)
- 14.2.5 Objective – High quality residential environments (amended)
- 14.2.5.1 Policy – Neighbourhood character, amenity and safety (amended)
- 14.2.5.2 Policy – High quality, medium density residential development (amended)
- 14.2.5.3 Policy – Quality large scale developments (new)
- 14.2.5.5 Policy – Assessment of wind effects (new)
- 14.2.5.6 Policy – Character of low density areas (amended)
- 14.2.6 Objective – Medium Density Residential Zone (new)
- 14.2.6.1 Policy – MDRS Policy 1 (new)
- 14.2.6.2 Policy – Local Centre Intensification Precinct (new)
- 14.2.7 Objective and 14.2.7.1- 14.2.7.6 Policies– High Density Residential Zone (new)
- 14.2.8 Objective – Future Urban Zone
- 14.2.8 Objective and Policies 14.2.8.1 and 14.2.8.2 (delete)
- 14.2.12 Objective – Compatibility with Industrial activities (new)
- 14.2.12.1 Policy – Managing effects of industrial activities (new)
- 15.2.2.1 Policy – Role of Centres (amended)
- 15.2.3 Objective – Office parks and mixed use areas outside the central city (amended)
- 15.2.3.2 Policy – Mixed use areas outside the central city (amended)
- 15.2.4 Objective – Urban form, scale and design outcomes (amended)
- 15.2.4.1 Policy – Scale and form of development (amended)
- 15.2.4.2 Policy – Design of new development (amended)
- 15.2.6.3 Policy – Amenity (amended)
- 15.2.6.5 Policy – Pedestrian focus (amended)
- 15.2.7 Objective – Role of Central City Mixed Use Zone (amended)
- 15.2.7.1 Policy – Diversity of activities (amended)
- 15.2.8 Objective – Built form and amenity in the central City mixed Use Zone (amended)
- 15.2.8.1 Policy – Usability and adaptability (amended)
- 15.2.8.2 Policy – Amenity and effects (amended)
- 15.2.8.3 Policy – Residential development (amended)
- 15.2.10.2 Policy – Residential development (amended)
- 16.2.2 Objective – Brownfield redevelopment (amended)

- 16.2.2.2 Policy – Brownfield redevelopment (amended)

CRC requests the following changes to the proposed provisions:

Chapter 6 General Rules and Procedures

Provision	Proposed change	Qualifying Matter	Support	Change requested	Comments
Sub-chapter 6.1A Qualifying Matters					
6.1A.1 Application of qualifying matters	New sub- chapter	Heritage areas, items and their settings, residential heritage areas	Support in full	None	Consistent with the CRPS
		Flood Hazard Management Areas	Support in full	None	Consistent with the CRPS
		Coastal Hazard Management Areas	Support in Full	None	Consistent with the CRPS
		Tsunami Management Area	Support in Full	None	Consistent with the CRPS
		Slope Instability Management Areas	Support in part	CRC consider that the Christchurch District Plan should take into account Trangmar's erosion classes and exclude "severe" erosion class land from further subdivision and development.	Excluding further subdivision on "severe" erosion class land would avoid additional sediment entering waterways from the land most likely to erode as a result of rainfall events. CRC consider that medium or high density development on the Port Hills would result in increased stormwater runoff as there is little attenuation capacity in some catchments. This could lead to more sediment loss into Cashmere Stream and the Heathcote/Ōpāwaho River and lead to gross sedimentation of waterways and the coast as well as stormwater networks and down-slope residents. Most of the Port hills are inside the High Soil Erosion Risk Zone under the

					Canterbury Land and Water Regional Plan. If such development occurs on these hills, there will be a need to require on-site attenuation. CRC understands that sedimentation is captured under Christchurch City Council bylaws, building consents, and in resource consent conditions, but notes that this is an opportunity to more holistically and strategically address the issue rather than relying on these other management mechanisms.
		Waterbody Setbacks	Support in Full	None	Consistent with the CRPS
		Radiocommunication Pathway Protection Corridors	Support in Full	None	Consistent with the CRPS
		Waste water constraint areas overlay (vacuum sewers)	Support in Full	None	Consistent with the CRPS
		Sites of Ngāi Tahu Significance, including Wāhi tapu, silent files, ngā tūranga tūpuna, ngā wai	Support in Full	None	Consistent with the CRPS
		Sites of ecological significance	Support in Full	None	Consistent with the CRPS
		Outstanding natural features and landscapes	Support in Full	None	Consistent with the CRPS
		Low Public Transport Accessibility Area	Oppose in Part	<p>The CRC Public Transport team would welcome further discussion on these provisions.</p> <p>CRC request either:</p> <ul style="list-style-type: none"> renaming of the “Low Public Transport Accessibility Overlay” to something 	Some of the areas identified as having low public transport accessibility in proposed PC14 are on core existing routes which already have high levels of public transport frequency. They might not be at the level of the ‘walk-out-and-go’ style that the Huihui Mai/Mass Rapid Transit project is looking at, but they are still

				<p>that better reflects the reason development is being restricted, in order to retain public confidence in the provision of public transport into the future. For example, the areas could be identified as "Low Connectivity Areas".</p> <p>Or</p> <ul style="list-style-type: none"> •that the "Low Public Transport Accessibility Overlay" better reflects areas where there is low access to public transport, by excluding areas (e.g. Sumner) where high frequency public transport is already available or planned. 	<p>high frequencies. The number 3 bus route that services Sumner for instance (Sumner being identified as a Low Transport Accessibility Area under PC14) is currently the highest frequency bus service in the city at a 10 minute all day frequency. There are 6 buses per hour going to Sumner and leaving from Sumner every weekday.</p> <p>Areas identified as having low public transport accessibility under PC14 have been selected based on criteria other than frequency of public transport provision, including the difficulty and cost of providing infrastructure to peripheral areas and the selection of public transport routes that connect employment centres rather than selection based on accessibility.</p> <p>In addition to the issue with existing routes, the overlay also seems to be at odds with planned improvements to public transport. Attachment 1 below shows a map from the Greater Christchurch Partnership's Huihui Mai consultation that is currently taking place, showing just some of the PT Futures improvement for the city. Identifying areas as having low public transport accessibility when upgrades have already been planned in those areas appears inconsistent with transport planning/</p> <p>The impression given to the public by the identification of these areas as having low public transport accessibility seems counterproductive to the Greater Christchurch Partnership's efforts to sell PT Futures improvements, particularly when the bus-based PT Futures improvements are modelled to deliver 106% patronage increase while the walk-out-and-go style MRT proposal only adds an additional 17% on top of that.</p>
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		Sunlight access	Support in Full	None	Consistent with the CRPS
		Residential Industrial Interface	Support in Full	None	Consistent with the CRPS
		Safe or efficient operation of nationally significant infrastructure (Electricity Transmission Corridors)	Support in Full	None	Consistent with the CRPS
		Safe or efficient operation of nationally significant infrastructure (Christchurch Airport)	Support in Part	CRC requests that the finalised remodelled Airport Noise Contours resulting from the peer review of the independent expert panel be included as a Qualifying Matter for intensification of development once they have been finalised. Until that process has been completed, CRC supports the use of the contours as included in the current CRPS as a Qualifying Matter	<p>CRC supports the inclusion of the Airport Noise Contours proposed as a Qualifying Matter for intensification of development under the Christchurch District Plan. The operative Airport Noise Contours are contained in the CRPS. The CRPS is due for review, with a notification date set for December 2024. Prior to initiating this review, CRC has requested, in accordance with Policy 6.3.11(3) of the CRPS that Christchurch International Airport Limited undertake a remodelling of the Airport Noise Contours. A peer review of the inputs, assumptions and outcomes of the remodelling is being undertaken by an independent expert panel. CRC will make the summary report of the remodelling publicly available as soon as practicable after receiving it.</p> <p>CRC supports the inclusion of the most up to date Airport Noise Contours as a Qualifying Matter subject to the findings of the peer review of the independent expert panel.</p>
		Safe or efficient operation of nationally significant infrastructure (NZ Rail Network)	Support in Full	None	Consistent with the CRPS

		Residential heritage areas (Medium density residential – Area specific rules)	Support in Full	None	Consistent with the CRPS
		Safe or efficient operation of nationally significant infrastructure (Lyttelton Port Influences Overlay)	Support in Full	None	Consistent with the CRPS
		City Spine Transport Corridor	Support in Full	None	Consistent with the CRPS
		Stormwater infrastructure		<p>CRC requests that upper Halswell River catchment areas within the Christchurch City Council area are covered by a Qualifying Matter that prevents further intensification because of inadequate stormwater infrastructure and downstream flooding effects.</p> <p>CRC requests that more generally, that the thresholds in the Christchurch City Council onsite stormwater mitigation guidance are re-evaluated to ensure that they are fit for purpose and avoid impacts in storm events that exceed the capacity of the mitigation devices.</p> <p>CRC requests that Stormwater Management Plans are provided for certification urgently.</p>	<p>CRC notes that inadequate stormwater infrastructure has not been included as a Qualifying Matter under PC14. CRC understands that the intention is for stormwater to continue to be managed under the Christchurch City Council bylaw and the building consent process. This approach allows the most up-to date information to be used rather than fixed constraints in the District Plan. This will be especially important as climate change impacts on rainfall patterns and on sea levels.</p> <p>While CRC understands the approach that is being taken, CRC has some concern about the thresholds in the Christchurch City Council onsite stormwater mitigation guidance that the current approach relies on. CRC requests that these thresholds are re-examined to ensure that they are fit for purpose and avoid impacts in storm events that exceed the capacity of the mitigation devices. CRC note that modelling is still being developed, and that Stormwater Management Plans are yet to be certified as required by Christchurch City Council's comprehensive stormwater network discharge consent.</p>

					<p>CRC has particular concerns about intensification in the Halswell River catchment. These concerns are based on increased stormwater volume as a result of housing intensification in the catchment, resulting in increased discharges into the Halswell River. CRC requests that upper catchment areas within the Christchurch City Council area are covered by a Qualifying Matter that prevents further intensification because of inadequate stormwater infrastructure and downstream flooding effects. There is potential for cumulative effects of infilling small lots on flat land where, under the onsite stormwater mitigation guidance, no mitigation is required. These cumulative effects would adversely affect others, especially those in existing Flood Management Areas.</p> <p>CRC is also concerned that intensification on the Port Hills would result in higher quantities of water entering the stormwater system and the Heathcote/Ōpāwaho River. Care will need to be taken to ensure that this does not breach the flood management conditions of Christchurch City Council's comprehensive stormwater network discharge consent.</p>
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Chapter 8 – Subdivision, Development and Earthworks

Provision	Support	Change requested	Comments
8.8.12 Natural and cultural heritage 8.8.13 All Rural Zones	Support in part	Renumber: 8.8.12 Additional matters – Subdivision around residential units within the Medium and High Density Residential Zones To 8.8.16 Additional matters – Subdivision around residential units within the Medium and High Density Residential Zones For consistency with previous numbering	Numbering issue.

8.8.12 Additional matters – Subdivision around residential units within the Medium and High Density Residential Zones 8.8.13 Additional matters – Subdivision in the Medium and High Density Residential Zones at north Halswell		Renumber: 8.8.13 Additional matters – Subdivision in the Medium and High Density Residential Zones at north Halswell To 8.8.17 Additional matters – Subdivision in the Medium and High Density Residential Zones at north Halswell For consistency with previous numbering	
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Chapter 14 - Residential

Provision	Support	Change requested	Comments
14.4.1.1. Permitted Activities	Support in part	CRC requests that instances in the permitted activities table (specifically P10, P11 and P12) of 'the tsunami inundation area as set out in Environment Canterbury report number R12/38 4 "Modelling coastal inundation in Christchurch and Kaiapoi from a South American Tsunami using topography from after the 2011 February Earthquake (2012), NIWA"; as shown in Appendix 14.16.5' be replaced with 'the Tsunami Management Area', to reflect the updated area.	The provisions have not been updated to reflect the most recent data available from NIWA.

While not related to specific provisions, CRC considers that careful assessment needs to be made of the effects of having more solid fuel home heating appliances in some areas, and restrictions on their installation may need to be considered. CRC requests that consideration be given to developing an overlay that identifies areas with poor air quality, to be used to require that no more wood-burners are able to be installed than are there currently. CRC understands that there is a balance to be struck between negatively impacting on air quality through intensification and a resulting larger number of wood-burners in a given area, and improved air quality as a result of lower emissions from motor vehicles as intensification decreases journey numbers and distances.

Attachment 1: Map showing integration with existing transport network

