

**Details of submitter No: 1085 - Mike Percasky**

<b>Submitter:</b>	Mike Percasky
<b>Submitter Address:</b>	<div></div>
<b>Behalf of:</b>	Duncans Lane Limited



## Our proposed Heritage Plan Change (PC13)

### Submitter Details

**Submission Date:** 17/05/2023

**First name:** Mike

**Last name:** Percasky

**Organisation:** Duncans Lane 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 Duncans Lane 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:** Duncans Lane Limited (**DLL**)

- 1 This is a submission on Plan Change 13 (**PC13**) to the Christchurch District Plan (the **Plan**).
- 2 DLL could not gain an advantage in trade competition through this submission.
- 3 DLL's submission relates to PC13 in its entirety.
- 4 DLL 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 DLL.
  - 4.3 All necessary consequential amendments.
- 5 DLL **wishes to be heard** in support of the submission.
- 6 If others make a similar submission, DLL will consider presenting a joint case with them at a hearing.

**Signed** for and on behalf of Duncans Lane Limited


pp. M Percasky  
12 May 2023

Address for service of submitter:

Duncans Lane 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 1432, heritage setting number 604)	Oppose	The submitter opposes the increased spatial extent of the heritage item and setting proposed (for the Duncan’s Buildings) on Aerial map reference 693 for heritage item number 1432 and heritage setting number 604. Among other reasons, the submitter is concerned at the increased costs and regulation imposed by the change relative to the benefits of the change.	Retain the existing spatial extent of the heritage item and setting for the Duncan’s Buildings as shown on Aerial map reference 693, Heritage item number 1432, heritage setting number 604.
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"> <li>• strategic objective 3.3.1 to ‘foster investment certainty’; and,</li> </ul>	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"> <li>• 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</li> <li>• 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'</li> </ul>	

Details of submitter No: 893 - Susanne and Janice Antill

Submitter:	Susanne and Janice Antill
Submitter Address:	

## Our proposed Housing and Business Choice Plan Change (14)

## Submitter Details

Submission Date: 18/05/2023

First name: Susanne and Janice

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

## Attached Documents

Name
submission to council (003) 

## **Submission on Christchurch City Council District Proposed Plan (12 May 2023)**

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: 1086 - Christian Jordan

Submitter:	Christian Jordan
Submitter Address:	



## Our proposed Heritage Plan Change (PC13)

### Submitter Details

**Submission Date:** 18/05/2023

**First name:** Christian

**Last name:** Jordan

**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	
submission to council (003)	

## PC13 Submission CCC

### Historic Heritage:

1. This *Plan* review should not be used to remove any Historic Sites from the register even if the site is damaged or destroyed.
2. A qualifying matter requiring an assessment of the heritage value for any pre 1940 building intended for demolition should be created.
3. The *qualifying matter* should require options for retention and reuse of any pre 1940 building (either in situ or via relocation within the site or immediate local area) to be considered prior to granting demolition consent. Consent for demolition should only be granted if the building does not contribute to the character of the area. This should apply across the entire city and not just in *Heritage* areas.

### Heritage Areas:

Further heritage areas need to be assessed and created across the city to protect Christchurch's remaining built history. Further thorough examination of the city needs to be undertaken to achieve this, however a requirement for all pre 1940 homes to be assessed prior to demolition consent being granted would counteract the urgency in identifying the appropriate areas needing protection.

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.

### Rationale:

Heritage tells the story of our past. It is also a gift from past generations to our future.

Memories of place are important for a sense of belonging and community.

Actively discouraging developers who do not value heritage buildings by requiring them to do additional assessment before demolition consent is granted (irrespective of a buildings heritage status), will create opportunities for other buyers to develop and restore these buildings in a way that respects their heritage values.

Often it is only a marginal decision whether a building can be saved or demolished and encouraging development of later (and now often dilapidated) 'tract' or 'housing company' 1950s and 60s homes sitting on large sites but still within close proximity of suburban centres is a better outcome for the city.

High quality houses with heritage value often sit on slightly larger sections which in a rapidly rising market through late 2020 to early 2022, led to decisions to demolish being made purely on the economics at *that moment in time*, rather than on the long view of the intrinsic value that a heritage building may have.

As these are irreversible losses, and the value of workmanship on these buildings generally well exceeds the current market value of the improvements, real care is needed to ensure potential value for future generations is not being discarded on the basis artificial economics.

**Artificially constraining zonings outside areas of pre 1940 homes while liberalising zoning in areas containing significant numbers of pre 1940 homes, creates artificial economic rationale for heritage demolition.**

The solutions for the city should also be read in context of my submission on PC14.

**Christian Jordan** May 2023

## Details of submitter No: 1088 - Anton Casutt

Submitter:	Anton Casutt
Submitter Address:	

## Our proposed Heritage Plan Change (PC13)

## Submitter Details

**Submission Date:** 19/05/2023**First name:** Anton**Last name:** Casutt**Postal address:****Email:****Daytime Phone:****Would you like to present your submission in person at a hearing?**

Yes

**Additional requirements for hearing:**

will consider a joint case.

## Attached Documents

## Name

Anton Casutt submission PC13 Redaction please

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\* Anton Casutt

Address\* [REDACTED] Postcode\* [REDACTED]

Email [REDACTED] Phone no. [REDACTED]

If you are responding on behalf of a recognised organisation, please provide:

Organisation's name [REDACTED]

Your role [REDACTED]

## 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 – don't want to speak on this

☐ 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 [REDACTED] Date 03/05/2023



## 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.)

Adding Scott St Sydenham  
to a Heritage or character  
area

~~not a heritage area~~

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.)

There are a lot of 1850's workers cottages in Scott St. There is one new cottage that was built about three years ago in the same style as the old cottages. There is also another cottage that was built about fifteen years ago in the same style as the old cottages.

Keep some of our history and building design.

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.)

Adding Scott St Sydenham  
as a Heritage or Character area.

Kōrero mai

# Have your say on the District Plan changes:

## Housing and Business Choice

(Plan Change 14)

## Heritage

(Plan Change 13)

Consultation document

Consultation closes 3 May 2023

[ccc.govt.nz/haveyoursay](https://ccc.govt.nz/haveyoursay)



**Details of submitter No: 1089 - Anne Dingwall**

<b>Submitter:</b>	Anne Dingwall
<b>Submitter Address:</b>	[REDACTED]
<b>Behalf of:</b>	Christchurch Civic Trust

## Our proposed Heritage Plan Change (PC13)



## Submitter Details

**Submission Date:** 22/05/2023**First name:** Ross**Last name:** Gray**Organisation:** Christchurch Civic Trust**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	
Christchurch Civic Trust - Email	
Christchurch Civic Trust submission on PC 13 May 12 2023	
Extract from 1 March 2023 CCT Deputation to CCC on PC 13 Heritage	
Extract from 1 March 2023 CCT Deputation to CCC on PC 13 Heritage	

**Mulder, Andrea**

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**From:** Ross and Lorraine Gray <[REDACTED]>  
**Sent:** Friday, 12 May 2023 1:45 pm  
**To:** Engagement  
**Subject:** CCT Submission on PC 13  
**Attachments:** Christchurch Civic Trust submission on PC 13 May 12 2023.pdf; Extract from 1 March 2023 CCT Deputation to CCC on PC 13 Heritage.pdf; Re-Use and Recycle to Reduce Carbon-2019-Historic England.pdf

Dear Engagement Officer,

Please find attached a submission on **PC13** from Christchurch Civic Trust. My details, as per the Consultation document, are as follows:

Name **Ross Gray**

Address [REDACTED]  
[REDACTED]

**Responding for Christchurch Civic Trust**

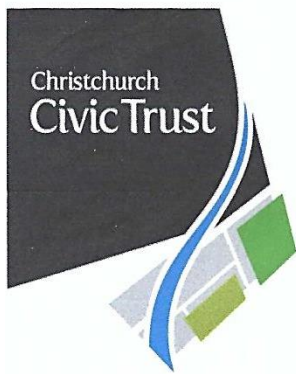
Role **Chair**

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

**I wish to speak in support of my submission on Plan Change 13**

**Please see PDF attachment**

Ross Gray 12 May 2023



The Christchurch Civic Trust Inc. PO Box 2632, Christchurch 8140, New Zealand

## CHRISTCHURCH CIVIC TRUST SUBMISSION ON CCC PLAN CHANGE 13

May 12<sup>th</sup> 2023

**Christchurch Civic Trust ('CCT')** appreciates the opportunity to contribute further to the achievement of a sustainable, equitable and efficient resolution for Christchurch of the issues arising from the Government-imposed housing intensification directives requiring Plan Changes 13 and 14 that will be considered by the Independent Hearings Panel.

### INTRODUCTION

**Christchurch Civic Trust (founded in 1965) Mission Statement:**

***"The role of Christchurch Civic Trust is to promote civic pride in Christchurch and surrounds by its ongoing public advocacy for good urban design and architecture, and by raising public awareness of the importance of the city's natural and built heritage."***

By way of example, CCT has mounted many successful campaigns to this end, which included *inter alia* opposing the 2004 Museum redevelopment proposal and the 2010 Arts Centre Music School proposal; leading campaigns to save and restore Mona Vale and McLean's Mansion; and ensuring that the Mt Vernon block became a much-loved restorative and recreational haven for all city dwellers. CCT has strongly supported the reinstatement of Christ Church Cathedral. CCT has advocated tirelessly for Hagley Park, the city's premier – and arguably the nation's most significant – central city recreational open space and cultural heritage site.

## 1. Our Heritage Our Taonga

from the 2022 CCC pre-engagement draft PC 13 document:

*“ISSUE 3 – Further buildings and items justify protection in the Schedule of Significant Historic Heritage” “...The Canterbury earthquakes resulted in large scale loss of heritage buildings in the District, particularly in the central city. The Council’s Heritage Strategy “Our Heritage Our Taonga” (2019) notes that feedback from the community is that our remaining built heritage is seen as even more precious and valuable ...”*

This point was made strongly by CCT and Historic Places Canterbury, (‘HPC’) during development of the Heritage Strategy. In fact, both groups requested that a reference and link to the heritage groups’ Weebly website documenting the enormous post-earthquake losses be included in the strategy document. This was not done.

[www.canterburyearthquakedemolist.weebly.com](http://www.canterburyearthquakedemolist.weebly.com)

## 2. CCT response to Plan Change 13 material in Christchurch City Council (‘CCC’) Have Your Say ‘full consultation document’, May 2023.

NOTE: public response to the ‘full consultation document (PDF, 4.1MB)’ may have been more readily facilitated if links to (key) detailed planning documents had been inserted into the consultation document itself.

p18 **Heritage buildings and items and RHAs:** an instance where a link to the detail of the proposed ‘buffers’ would have been helpful.

p19 **Residential Character Areas:** CCT fully supports proposed measures.

**Trees** The marked decrease in Christchurch canopy cover is an outrage which must be reversed. In contrast to nearly all the other Tier I cities, Christchurch’s planar topography requires relatively more trees (including large ones), not fewer – and that is just for social and aesthetic reasons, let alone providing green lungs to mitigate global heating. CCC should aspire to promoting Christchurch as ‘the City of Trees’!

Para 2: an example or two of ‘other non-regulatory ways’ would have been helpful.

Para 3: a thoughtful proposal, but takes little or no account of the amenity value tree planting provides when it is in close proximity to where residents live, rather than in far-flung pockets.

Para 4: CCT fully supports the proposal that the Schedule of Significant and Other Trees becomes a Qualifying Matter. CCT is concerned at an apparent lack of ready reference to penalties for destruction of such trees; penalties should be commensurate with the loss to the city's natural and cultural infrastructure. A deterrent bespoke replacement tree growth variable cost formula should be established and widely publicised.

Paras 6, 7 are positive with outcomes of public response to the Urban Forest Plan awaited with high interest.

p24 **Heritage Plan Change (PC 13) Residential Heritage Areas:** CCT has already offered support for proposed CDP protection for 11 new RHAs as a Qualifying Matter. The continued threat to the Scheduled Highly Significant Englefield Lodge, at the core of the Englefield Avonville RHA, greatly concerns CCT, HPC, the Englefield Residents' Association and many other residents of Christchurch. This is the site of the city's oldest substantial heritage residence with an enormously important historical connection to the founding of the city. It should be noted that this RHA is the eastern-most in the city.

p25 **PC13 Changes include:**  
bullet point 1 CCT (and HPC) strongly advocated for the 44 additions to the CDP Schedule of Significant Historic Heritage. Presentation was made by CCT to CCC (May 2022 and 1 March CCC PC Notification meeting) for inclusion / retention of: Upper Riccarton War Memorial Library, Englefield Lodge; Princess Margaret Hospital buildings, Daresbury. In the pre-engagement round CCT advocated for the inclusion of the remaining Barnett Avenue Pensioner Cottages.

bps 2 and 3 are fully supported by CCT. Clear guidelines as to possible changes to buildings without a resource consent will be required; link to details would have been helpful.

p27 **Next steps for our plan changes:**  
**glaring error** in penultimate sentence of para 3 (rh column) which should say '... be March / April **2024.**'

**potential confusion** between final sentence 'All heritage-related controls ...immediate legal effect upon notification ...' and in Decision-making process step 6 'By April 2024 ... and Heritage Plan Change become operative'

Decision-making process: there is also a need to clarify step 5 – the Minister for the Environment does not make the final decision for disputed PC 13 heritage matters.

### 3. Specific Heritage Items /Sites of concern to CCT

- **Hagley Park ('HP'):** The encroachment on HP values by the 2021 Resource Consent for the Ryman Healthcare development on Park Tce and adjacent streets was of considerable concern to CCT, ICON and others. Objections were made to the exceedance of height limits of buildings facing HP. Such concerns continue, despite there being no sign of building on that site. CCT urges that height exceedences, which in this case were allowed in the extreme by the Commissioners under the operative CDP, do not occur under PC 14 with the potential for deleterious outcomes also impacting on PC 13 Heritage. Given the significance of the Government-imposed building height increases, there must be no room for further height creep.

**For further discussion refer to Appendix A**

- **Upper Riccarton War Memorial Library ('URWML'):** its future remains an open question with CCT and HPC awaiting a staff report following the groups' September 2022 submission on future adaptive reuse. We urge that inclusion of URWML in the Schedule of Heritage buildings is made as soon as is practicable.
- **The Princess Margaret Hospital buildings and site ('PMH'):** it was hoped by CCT that PMH would also be included in the Schedule. It has been stated by the Heritage Team that this can be considered at a future date. CCT urges that this does happen as soon as practicable. Apart from its being one of the few mid-later 20C major buildings to survive post-quake demolition (which deprived the city of the former Millers building and the former Christchurch Railway Station), PMH is an integral part of the area's and city's historical psyche and offers vast potential for adaptive reuse. Equally, if not more importantly, it is an enormous store of embodied energy. If demolished, it will be a huge source of CO2 emissions, including as a result of replacement buildings on the site. CCT urges that the buildings, with 4 hectares (40,000m2) of floor space, are retained.

**For further discussion refer to Appendix B**

- **Daresbury House ('Daresbury'):** alarmingly, the owner of Daresbury in Fendalton is seeking its removal from the Heritage Schedule. This is one of the nation's great domestic buildings, a Hurst Seager masterpiece, residence of the Governor-General (1940 -1950). Daresbury received the Christchurch Civic Trust Supreme Award for restoration and refurbishment in November 2010. If it is removed from the Schedule, this heritage taonga will be completely open to demolition, with no protection whatsoever because a resource consent to demolish will not be required. Furthermore, although it

was built after 1900, its potential protection under an archaeological authority, which may pertain to the site, gives no guarantee of protection for the building itself. **CCT considers it essential that Daresbury remains as a Highly Significant building on the CCC Heritage Schedule.**

(Refer to separate PDF: extract from 1 March 2023 CCT Deputation to CCC on PC 13, Daresbury and Englefield)

- **Englefield Lodge:** it is greatly appreciated that Englefield Avonville historic area has been notified as a Residential Heritage Area. As noted earlier, along with many others, CCT despairs at the continuing ‘demolition by neglect’ of Englefield Lodge, a Highly Significant building on the CCC Heritage Schedule. Recipient In 1973 of an undertaking by Prime Minister Norman Kirk to ensure its continued existence, this residence is the city’s oldest remaining substantial heritage dwelling (1855-6, 280 m2). It should form the core of a vibrant Englefield Avonville Residential Heritage Area. **Retention of this key scheduled building could involve a PPP between council and eg Box 112 who are ‘... investors, developers, constructors ...’ and Christchurch City Council.**

(Refer to separate PDF: extract from 1 March 2023 CCT Deputation to CCC on PC 13, Englefield and Daresbury)

- **Barnett Avenue Pensioner Cottages:** CCT is disappointed that Christchurch’s (and the nation’s) very first city council-provided pensioners’ rental accommodation complex, the Barnett Ave Pensioner Cottages, is not on the revised Schedule. CCT had earlier argued that it should be and continues to believe that the ‘conserve and upcycle’ concept for buildings – good for heritage and good for the environment – could be applied. Appropriate earthquake strengthening of the remaining buildings (which survived the quakes relatively well and were rated at approximately 41% NBS in 2014), retrofitting of double glazing, installation of efficient heating systems and so on, along with appropriate internal remodelling, could well be competitive with demolition and new-build financial and environmental costs. An opportunity to celebrate the uniqueness of this building complex is in danger of being totally lost.

#### **4. The provisions of the CDP in relation to heritage in a climate change (global heating) emergency.**

- In 2022 CCT and HPC contested a resource consent application by Canterbury Jockey Club for demolition of the Grand National Stand at Riccarton Park. Many ideas for adaptive reuse were offered. However, in our view, the Commissioner (and Council Heritage staff) placed undue emphasis on just **one** of five heritage criteria: ‘iii. **whether the costs to retain the heritage item (particularly as a result of damage) would be unreasonable.**’ In



fact, the costs to repair damage were relatively modest. The high seismic strengthening costs which were cited by the applicant were by far the major 'problem'. No consideration at all was given to the effects of demolition on the wider environment and climate change (global heating).

- CCT considers it imperative that an energy consumption and emissions 'whole of life' audit be undertaken for building projects to establish costs to the environment of energy consumption and CO2 emissions. Such audits should automatically accompany claimed QR costs of new buildings; and demolition costs should be included in an assessment of the financial costs of any project. In the GNS case, CCT and HPC had to request that such a figure be provided. An 'estimate' only of the cost of demolition was eventually provided by the applicant

## 5. Appendices

### Appendix A Hagley Park

#### Comment about Hagley Park (CCC Scheduled Highly Significant heritage item) in relation to PC 13 Heritage

**The Hagley Park Management Plan 2007 clearly states:**  
From P3

Under the heading '**STRATEGIC OBJECTIVES**', one of the stated objectives is:

- *To investigate the potential provision in the City of Christchurch City Plan of a special conservation zone around Hagley Park to protect the integrity of the visual landscape character of the park.*

From P22

Under the heading '**Part A: Hagley Park Landscape Character Analysis**' and under the subheading '**Expressions**':

*(ii) Open Space*

*... A wide skyline is an important element of the experience one has in the larger open space areas within the Park. Therefore, it is desirable, on landscape grounds, that this is not further intruded into on the perimeter of the Park by tall buildings on adjacent land.*

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## **PART II POLICIES**

From P78

## 2.0 OPEN SPACE COMPONENT

**OBJECTIVE 2:** *To protect the open spaces of Hagley Park and the visual amenity of the road users. To promote Hagley Park as a major feature of the open space system of the inner city.*

**POLICY:** 2.3 *A study shall be carried out in conjunction with neighbourhood studies to identify opportunities and develop proposals to reinforce the linkages that exist between Hagley Park and the city. Comment: The Avon River and roading network offers considerable opportunity to extend the features of the Park into the surrounding city.*

2.4 *Roadway design and construction in the vicinity of Hagley Park shall take the character of the Park into consideration and reinforce the Park boundary. Comment: For example, trees are a major feature of Hagley Park that can be incorporated into the surrounding roadways.*

- Since the HP Management Plan was written in 2007, much has happened to interrupt the proposed study (under Policy: 2.3 above) and the expected review of The Plan 10 years after its commencement. However, what has been achieved post-earthquakes is the 2015 inclusion of Hagley Park on the CCC Schedule as a Highly Significant item. This makes the case for careful control of intensified housing in the Hagley Park (near) environs all the more important, notwithstanding the approval in 2021 of the Ryman Healthcare development on its Bishopspark and Peterborough sites. Note that heights approved by the two Commissioners were considerably above permitted Christchurch District Plan limits: Bishopspark site from 14 m to 19.5 m a 39.25% exceedance.

CCT calls for a defined Hagley Park buffer to be established in PC 13; and recommends that Hagley Park be included in PC 14 as a Qualifying Matter.

## Appendix B Princess Margaret Hospital

**Housing intensification in a Climate Change (Global Heating) Emergency and the need to 'recycle' buildings: Princess Margaret Hospital buildings, a case in point.**

- The Princess Margaret Hospital: although earthquake damaged, is the city's only major surviving building complex of the period / style and is of great significance locally and more widely. Retention of this building complex is very important in cultural and environmental terms.

- Second only to transport, construction and demolition (C&D) is the nation's largest producer of CO<sub>2</sub>: manufacture of materials: concrete, steel, glass – heavy energy consumption and CO<sub>2</sub> emissions; heavy freight transportation (non-renewable energy consumption, CO<sub>2</sub> emissions). This stage is often preceded by demolition of existing structures (a part of the cycle which is also heavy in energy consumption, high CO<sub>2</sub> production). These structures have already been in part responsible for creating first-stage emissions as already outlined. Note that the CO<sub>2</sub> produced during the building of a structure 50 years ago and even up to 100 years ago is still present in the atmosphere.
- As well as the above, C&D accounts for approximately 40% of hard fill waste disposal in New Zealand refuse stations.
- What is needed in the rush to intensify housing is careful research and analysis into the environmental costs of precipitate demolition of existing buildings – dwellings, multi-block structures and public, commercial and Industrial buildings – which, with suitable remediation, are capable of meeting housing needs. Clear financial benefits can also occur with such existing buildings, which are often situated in or near the centre of the city. With suitable seismic strengthening and adaptive design work, there exists considerable capacity for the housing of individuals, families, communities. In comparison with a new build this can result in: significant reduction in emissions / energy use / landfill discharge; the achieving of a clear nett cost saving in dollar terms – not to mention retention of community and cultural capital.
- The Princess Margaret Hospital has a total floor space of 40,000m<sup>2</sup>, ie 4 hectares (10 acres). This historic (if not yet heritage) structure, although earthquake damaged, would be capable of remediation and re-purposing for the housing of a significantly-sized community, while fulfilling a 'centre of local community' need. It is a long-established icon of the lower Cashmere environs and could continue in a mixed-use residential, commercial, health, cultural and social role with perfect access to Cashmere High School, Pioneer Stadium and numerous easily accessible outdoor recreation and pursuits opportunities.
- CCT offers the suggestion that Ngāi Tahu, as tangata whenua, be invited to explore the idea of establishing a new marae on this site, possibly even within the building. This could also greatly enrich the community itself.
- Efficient existing public transport servicing and plentiful on-site parking are also attractive components of this adaptive reuse proposition.

- The demolition of PMH would result in an enormous loss of embodied energy and, given its reinforced concrete brick-clad construction, extremely high demolition costs (\$ cost and climate change cost). To then build housing structures of at least three storeys on the site would increase these various costs greatly.
- Using CDP data (minimum of 30 households / hectare) it would appear that retention, strengthening and re-purposing of the Princess Margaret Hospital building complex could result in accommodation for at least 120 households on this site – approximately 400 residents. The environmental cost to achieve this would be low (energy consumption and emissions) and the financial cost could be below that of demolition and rebuild for the equivalent housing numbers and provision of community facilities.

(Refer to separate PDF, 'There's No Place Like Old Homes; Re-use and Recycle to Reduce Carbon' kindly supplied by Nigel Gilkison, Chair Timaru Civic Trust)



Extract from 1 March 2023 CCT Deputation to CCC on PC 13 Heritage: Englefield and Daresbury

**1973** *The Press, Saturday March 15, 1980 P3* **promise may save Englefield**



By FELICITY PRICE

A promise made by the Christchurch City Council seven years ago may save the historic Englefield home- stead in Avonside, from demolition.

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"The girls sent a petition to the Prime Minister (Mr Kirk) which resulted in a promise by the Christchurch City Council to preserve the historic property, which was built in 1856 by one of the founders of the Canterbury settlement, William Guise Brittan."

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In response to a feature story in "The Press" last Wednesday about Englefield and the possibility that it may still be demolished to make way for the Avonside- Woodham expressway, Mr Thomson wrote in to give a few more details about the history of the house. He mentioned the 1973 picture at the end of his letter.

After Mr Hay had obtained a copy of the 1973 picture and caption, he said that so far as he was concerned he would support preservation of Englefield.

"If the council of 1973 made an undertaking that the building would be preserved, then preserved it must be," he said. "I believe that if the promise was made then we've got to honour it."

Mr Hay said he was only the Mayor and not the whole council: the final decision would have to be made by the full council and not himself alone.

It did not matter that the pledge to save the building had been made by a Labour council.

"It was a decision made by the whole council and, as such, it should be binding."

The petitioners from Avonside Girls' High School outside Englefield in 1973.



# Newsletter

NOVEMBER 2010

## CIVIC TRUST AWARDS



Daresbury, 67 Fendalton Rd - Awarded a Supreme Award



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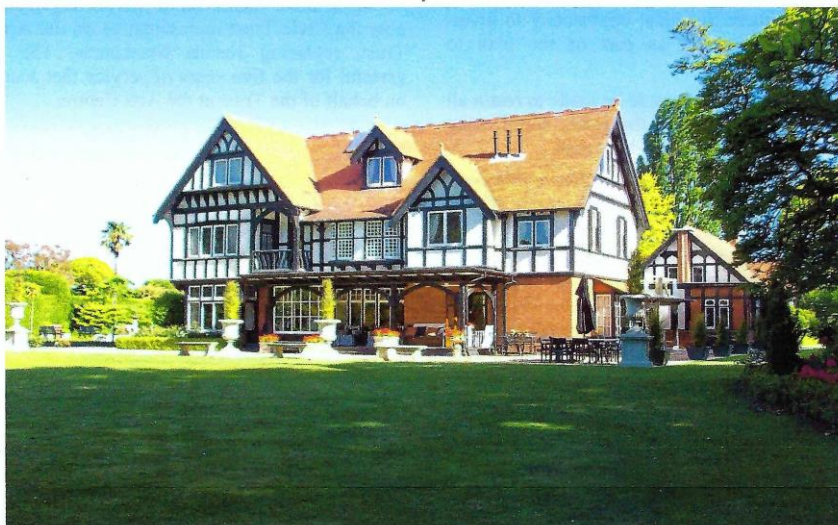
The petitioners from Avonside Girls' High School outside Englefield in 1973.



# Newsletter

NOVEMBER 2010

## CIVIC TRUST AWARDS



Daresbury, 67 Fendalton Rd - Awarded a Supreme Award

**Details of submitter No: 902 - Faye Collins**

<b>Submitter:</b>	Faye Collins
<b>Submitter Address:</b>	[REDACTED]
<b>Organisation:</b>	Waipuna Halswell-Hornby-Riccarton Community Board

## Our proposed Housing and Business Choice Plan Change (14)

## Submitter Details

Submission Date: 22/05/2023

First name: Helen

Last name: Broughton

## Organisation:

Waipuna Halswell-Hornby-Riccarton Community Board

Preferred method of contact Email

Postal address:

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

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	
Waipuna Halswell-Hornby Riccarton Community Board - email	
FINAL- Draft Housing and Business Choice Plan Change 14 Submission	



**Mulder, Andrea**

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**From:** Collins, Faye  
**Sent:** Friday, 12 May 2023 4:21 pm  
**To:** Engagement  
**Cc:** Broughton, Helen  
**Subject:** WAIPUNA HALSWELL HORNBY RICCARTON SUBMISSION ON PLAN CHANGE 14  
**Attachments:** FINAL- Draft Housing and Business Choice Plan Change 14 Submission.pdf

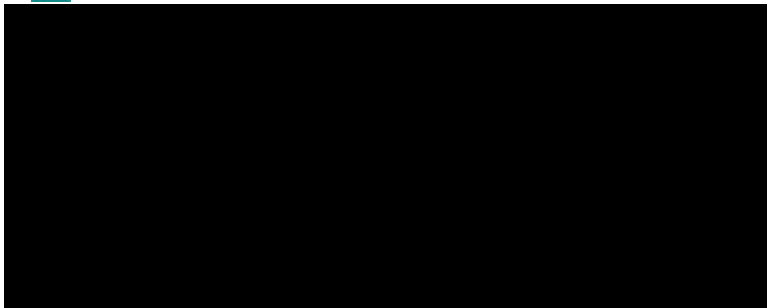
Good afternoon,

Please find attached the community Board's submission on Plan Change 14 -Housing and Business Choice

**Faye Collins**

**Community Board Adviser**

Comm. Governance Team (Hal-Hor-Ric)



## **Draft Housing and Business Choice Plan Change 14**

### **Waipuna Halswell Hornby Riccarton Community Board**

#### **1. Introduction**

- 1.1. The Waipuna Halswell-Hornby-Riccarton Community Board ("the Board") appreciates the opportunity to make a submission on Draft Housing and Business Choice Plan Change 14 the ("the Plan").
- 1.2. The Board wishes to be heard in support of its submission.
- 1.3. The Board's responses to the specific detailed changes to the District Plan will be provided separately.
- 1.4. The Board recognises that the purpose of the proposed changes in the Draft Housing and Business Choice Plan Change 14 ("the Plan") is to address population growth, housing issues, including affordability, and climate change and to bring the District Plan in line with government direction of the National Policy Statement-Urban Development and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 ("the Act") to enable more development in the city's existing urban footprint by allowing higher height limits within and around the City Centre and suburban commercial centres.

#### **Tier 1 City**

- 1.5. The Board considers, however, that it is unnecessary and inappropriate for Christchurch City Council to be included as a Tier 1 territorial authority under the Act. The Board submits that, unlike other cities controlled by Tier 1 authorities, Christchurch has sufficient land capacity for housing in the short, medium, and long term. This is largely the result of the recovery plans, regeneration plans and Independent Hearings Panel process for the Christchurch District Plan following the 2010-11 earthquake sequence that have produced land use planning changes that have already enabled Christchurch to provide better for housing supply and intensification than other cities. In these circumstances the "one size fit all" approach of the Act is clearly not justified. Mayor's letter to the Minister of the Environment dated 2019 to be provided.

#### **Population Projections**

- 1.6. The Board questions the population projections used. It understands a team of staff from Christchurch City Council and The Canterbury Regional Council (Environment Canterbury) formed projections based on the Livingstone Report. The Board considers the projected population increase used for the Plan to be far higher than previous projections.
- 1.7. The Chairperson of the Board has received advice from Blackburn Management Ltd, a company monitoring construction levels in Canterbury, that indicates the population of Christchurch has been in recent decline - "not by a tremendous amount but it is definitely not growing". (- 0.5% in 2021 and - 0.2% in 2022.) Compare this to neighbouring Selwyn (+5% in 2022) and Waimakariri (+2% in 2022.) "The Blackburn report indicates that medium density dwellings are oversupplied. Please find refer to the graph and Executive Summary in the attached document. Mr Mike Blackburn Is prepared to be a technical witness at the Independent Panels' Hearings in October 2023.

- 1.8. The Board requests that population projections and the need for high and medium density housing are based on accurate figures. The Christchurch District Plan should be based on accurate indications of growth. It is sad that existing communities are being destroyed or affected in a major way for a theory that may be based on inadequate figures.

### Concerns

- 1.9. The Board is concerned that some areas are moving from suburban density to high density. This means that some citizens are in a suburban density area, where the maximum is currently two storeys, now moving to high density, six storeys. There are three areas in the Board are facing this scenario - Church Corner represented by the Church Corner Residents' Association, the area around Riccarton House and Bush, represented by the Riccarton Bush / Kilmarnock Residents' Association and Hornby represented by the Greater Hornby Residents Association. Obviously, this affects longstanding residents, but at a recent meeting new residents who bought character homes or built new homes in Riccarton expressed anger - they had bought in an area that was low density to now find there was a government mandate for high density. Hornby similarly has some areas where this is occurring. This seems particularly unfair for the residents affected in this way. The Board requests that a rule be included providing that no area that is suburban density currently should be re-zoned high density.
- 1.10. Regarding housing affordability, the Board highlights that the Council's Section 32 analysis recognises that housing affordability is unlikely to be achieved via the proposals in the Plan.
- 1.11. The Board is also concerned that the city's infrastructure will not be able to cope with the level of intensification proposed and it understands that no full assessment of the capacity of infrastructure (electricity and water) has been undertaken. It notes and shares the concerns raised by Orion in feedback submitted on 4 February 2022 in response to the Council's original engagement.
- 1.12. Additionally, the Board notes that no social impact assessment has been undertaken as part of the plan despite the enormous social implications of the proposal. The Board understands that this would normally be done prior the plan change being released for consultation (Section 32, 1(c) and 2(a) Resource Management Act 1991. There were 700 submissions in a pre-formal consultation phase that could have formed the basis of a social impact report.
- 1.13. The Board recognises also that the proposed changes **aim** to provide for more houses in the parts of the city that are close to growing commercial centres, where there is good access to services, public transport networks and infrastructure and that building more homes on the existing urban footprint will protect versatile soils. The Board is conscious, however, that there has been no independent assessment of services, public transport networks and infrastructure to determine their ability to cope with the level of intensification proposed in the Plan.
- 1.14. The Board understands that some of the proposed changes are legal requirements of the new national direction and cannot be easily influenced by the Council, or community feedback. The Board nevertheless considers that it is important to record and support the views of many residents who are strongly opposed to the imposition of the government mandated intensification proposals.
- 1.15. The Board understands the Council has discretion around matters including:
- walkability,
  - building height etc.
  - whether small scale retail is included in the definition of Town Centres.

## Earthquake city

- 1.16. The Board notes that “Qualifying Matters” in terms of the Resource Management Act 1991 are characteristics or qualities specific to some areas or properties, which means the rules enabling increased development will be modified to the extent necessary to maintain and protect values or manage effects and includes “any other matter that makes higher density, as provided for by the MDRS or policy 3, inappropriate in an area, but only if section 77L is satisfied”.

- 1.17. **The Board queries whether the effects of the major earthquake sequence suffered by Christchurch in 2010-11 should be regarded a qualifying matter for the whole city? Residents of Christchurch are understandably concerned about increased height of buildings proposed by the intensification not only because of the actual earthquake risks of taller buildings, but also the psychological effects (as referred in 1.19 no social impact assessment has been undertaken to date) of these buildings on residents who have been traumatised by the earthquake experience. The Board is aware that has been no geotechnical assessment or report undertaken as part of the Plan, but believes strongly that the city’s proven ongoing earthquake susceptibility should be accepted as a qualifying matter and that the whole of Christchurch should not be subject to the proposed intensification requirements. See the video at <https://af8.org.nz/af8-scenario> re Alpine Fault risk.**

The Board stresses that if this is accepted it will not prevent intensification in the city but will change the focus to building taller buildings in parts of the city where they are acceptable to residents and providing the Council with more discretion about the type of intensification that is appropriate for Christchurch. In the event that earthquake susceptibility of the whole city is not accepted as a qualifying matter, the Board considers that at least the most susceptible TC3 land should be a qualifying matter.

- 1.18. The Board feels compelled to record the views of many residents who have expressed concern that the directions from central government being given effect to remove the opportunity for them to have any meaningful voice in planning the city they have chosen to live in and will destroy the unique character of Christchurch. Many recall post-earthquake agreements with central and local government representatives, that Christchurch would be low rise in the future. They regard the proposed changes as a breach of trust for those who have invested in the city and their local areas in good faith.

- 1.19. The Board reiterates its concern that there have **not** been assessments on:

- **social impacts**
- **infrastructure capacity**
- **citywide geotechnical stability**

provided as part of the consultation. The Board is concerned that the absence of these assessments makes it extremely difficult for residents to make fully informed submissions.

- 1.20. The Board appreciates that Riccarton Bush Interface has been accepted as a qualifying matter in the Plan, but considers further adjustment to the area is required. This is further referred to below in Riccarton Issues.

## 2. Medium Density Residential Zoning

- 2.1. As indicated above the Board is concerned at “the one size fits all” approach that will see most residential areas of Christchurch become a Medium Density Residential Zone as it considers that this zoning, that allows development of up to three homes of up to 12 metres high on a single property, without resource consent, is not suitable for many areas.

### Baseline

- 2.2. The Board notes that the Medium Density Residential Zone does not limit development to three stories/12metres but creates a permitted base line for housing developments. Development higher than three storeys will be considered via the resource consent process that will focus on the effects of the development above the baseline. This means that the effects of a proposed five storey building will be considered as the effects of the additional two storeys only. There was a recent example of a development in Riccarton in a medium density residential zoned area that would normally lead to 3 storey town houses of a five storey, 42 apartment building being approved by way resource consent without notification or hearing- Resource Consent RMA2016/1434 attached.

### Qualifying Matters

- 2.3. The Board considers that many areas of the city are unsuitable for the proposed increased development that is enabled by The Plan. The Board **notes** that strong evidence is required for something to be a Qualifying Matter and considers that the threshold for qualifying matters is too high with the criteria including: matters of national importance, nationally significant infrastructure, heritage and public open space and ‘other matters’, requiring significant evidence, including site-by-site evaluation and full consideration of what housing or business capacity is likely to be lost by stopping or limiting more homes from being built and an options analysis for how higher densities can still be achieved.
- 2.4. The Board supports the Qualifying matters proposed in the Plan but **does not consider** that the categories are sufficient to represent many areas of the city that ought to be exempt from the intensification proposals in the Plan. The Board **considers** that there needs to be recognition of a range of other matters that render areas of the city unsuitable for the type of intensification proposed. These matters include land stability and the height of the water table in some areas, as well as the capacity of infrastructure such as roading to cope with additional development particularly in areas of already rapid growth. In Halswell there is evidence that roads are already struggling to cope with the traffic generated by the growth. The Board **notes** that the removal of the requirement for developments to provide on-site parking is already causing parking and traffic issues. There are vehicles having to be parked on pavements and illegally in suburban streets; this is likely to become much more severe with the proposed allowable intensification (Any requirement for onsite parking was removed in February 2021).

### Trees and Financial contributions

- 2.5. In recognition of the many environmental economic, cultural and social benefits, Christchurch is currently planning to increase its tree canopy focusing firstly on those areas of the city that currently have lower percentage of trees. One of these areas, Hornby is in the Board area and parts of it are proposed to be zoned higher density under the Plan. The Board understands that it is proposed as part of the Plan to require Financial Contributions from developers where trees are not retained or planted as part of a development. The purpose of the contributions is to help fund increasing the tree canopy cover in the city. The Board submits that these financial contributions will not necessarily help to increase the urban forest in the parts of the city where it is most needed due to a current deficit. It is

critical that financial contributions regarding trees be used in the ward that the development occurs in. There needs to be a change to the financial contributions policy to address this.

- 2.6. Christchurch is known as the Garden City, but in terms of tree canopy cover it has fallen below other cities. The move to enhance tree canopy cover via Ōtautahi Christchurch Urban Forest Plan is undermined by the intensification requirements of central government. The two policies are contradicting each other.
- 2.7. It is important to note that Council has no discretion over the removal of roadside trees if a developer wants a different entrance to a new development compared to the older development. Often a replacement tree is planted that will take many years to fully grow. The Board suggests there be no discretion for roadside reserve trees - that a tree be replanted on the roadside where trees have been removed and that it be as mature as possible. In terms of the Resource Management Act it should be a “discretionary activity”.
- 2.8. Trees on site – The Board suggests the aim of 20% minimum tree coverage is positive, but unlikely to be achieved. The Board envisages medium or high-density developments will find it difficult to meet the 20% minimum cover. It is likely a financial contribution will need to be paid instead. The Board suggests the financial contribution be used for trees in the vicinity or at the very least within the same ward area.
- 2.9. The Board does not have sufficient expertise to comment on the level of the financial contribution although it does support financial contributions being paid where the developer is unwilling or unable to plant trees. The Board is very clear about the strong requirement to plant mature trees on roadside reserve.

#### **Recession Planes and Sunlight**

- 2.10. The Board fully supports the modified approach to recession planes to better reflect Christchurch's specific latitude. However, we suggest it does not go far enough. The Board requests that there is provision for all ground floor dwellings to have access to sunlight all year round.

#### **Noise Contours**

- 2.11. Noise Contours- The Board understands a final noise contours proposal will be produced shortly. The Board supports noise contours being a qualifying matter. The Board suggests that contours be extended further as some residents seek clarification as to why one side of the street was included and not the other. The Board will seek more clarification of the modelling.

### **3. Higher Density Zoning**

- 3.1. The Board notes that under the National Policy Statement – Urban Development 2020 building development even greater than what is allowed under the Medium Density Residential Standards is to be enabled within and around the central city and suburban commercial centres. The Board considers that the current zonings levels appear unnecessarily complex and that it would be preferable that there be Town Centres, Local Centres and Neighbourhood Centres only.
- 3.2. All Town Centres are enabled to go to six stories. Removing the “Larger Local Centre” would mean that the maximum height of housing around the Bush Inn Centre would be 14 metres. This would be well welcomed by the local community and appropriate given that the Bush

Inn Centre is currently hard to categorize as a larger local Centres without a supermarket and is more akin to a Local Centre. Many of the shops are currently closed. More evidence is likely to be produced on this at the hearing.

- 3.3. The Board is opposed to a residential building height increase beyond 12 metres in areas other than the City Centre. It considers development up to 20 metres to be to be totally inappropriate for Town Centres including North Halswell and Large local Centres such as Church Corner and will be totally at odds with the character of these areas.
- 3.4. Commercial buildings proposal for an increase of building heights to 20 or 22 metres (six storeys, depending on building design) in line with High Density Residential Zone in Riccarton and Hornby. The Board recognises that the proposed changes aim to provide for more houses in the parts of the city that are close to growing commercial centres, where there's good access to services, public transport networks and infrastructure, but considers that meeting this aim as proposed in these areas will destroy the character of the area. While the Board understand the importance of intensification the Plan change as it stands seems likely to achieve this at the cost of the character and livability of these areas for both existing and new residents.
- 3.5. The Board also questions whether provision for six stories is required since development to three stories is generally mandated across the city? Victoria Street residents have information that questions "Has government overcooked intensification?" The Board is concerned that Central Government when it required six storey development in August 2020 had no idea that three storeys across Tier One Cities would be mandated as well in November 2021 with the support of the opposition.

### **Central City**

- 3.6. The Board believes high- density residential development in areas such as Riccarton and Hornby will detract from intensification in the Central City and Council's aim for a vibrant central city. Since at least 2001, Council has argued for more residents to live in the central city to make a viable city centre. High rise developments in Riccarton, Hornby, Papanui will undermine this objective. As land will be less expensive, developers will tend to build in the suburban locations and the goal of revitalising the central city may be lost for now and future generations. It is critical that the central city is considered a priority. There is strong consensus from residents on the need to revitalise the central city. Riccarton is particularly affected, having two Commercial Centres close together- Westfield and Bush Inn Centre. It is very unusual to have a large Town Centre close to the Central City - added to this is the fact the Bush Inn Centre is very close to Westfield. In fact, if the intensification was to go ahead as planned much of Riccarton would be zoned for up to six stories. The Board doubts that this was intended or foreseen by the parliamentarians passing the legislation. To avoid this situation an additional "qualifying matter" could be introduced that there needs to be significant distance between Town Centres. The Board will access technical evidence before the hearing.

### **Commercial Centres**

- 3.7. Certain sections of Chapter 15 of the District Plan are to change with Plan Change 14.

There are two major concerns:

- Height: The Board opposes changing the provisions for the maximum height of a building from 20 to 22 metres. The currently plan allows a height of 20 metres but the proposal is to allow 22 metres. The Board's understanding is the increased



height was requested by Scentre in the informal consultation stage. The Board has no objection to the increased height for a large complex such as Westfield, but is concerned at currently low level commercial buildings alongside residential areas being 22 metres. One example is the low-level commercial buildings on the northern side of Riccarton Road. The height of 20 metres was allowed in the 2016 Christchurch District Plan; until then building was allowed to 12 metres. The area of Kauri/Rata/Rimu has been viewed as critical to protect. The Riccarton Borough Council considered zoning the area residential, but settled on low rise commercial. The low-rise commercial has worked reasonably well. The Board requests a change of policy that the maximum height of low rise commercial buildings by a residential sector be reduced to 14 metres. We will advance more detailed argument {if more technical evidence can be provided} but at a minimum, it requests the height remain at the current level of 20 metres.

- **Setback.** 15.4.2.4 the Board supports the proposed distance between the commercial and residential but would prefer greater distance. (More technical evidence may be available at the Hearing). The Board considers that the height of a commercial building alongside a residential area needs to be adjusted if the residential area is not zoned for 20 metres. The Board supports in such instances the height be reduced to 14 metres, but is aware this may not be possible if the 20 metre height is already approved in the current District Plan. There are concerns if there is little or no separation between the commercial and residential. There is an example on the northern side of Riccarton Road, where there is no buffer due to a previous rezoning in 2015. (More technical evidence will be supplied at the hearing if available). The Board does not know if this is an individual situation or more widespread.

## Local Issues

### Hornby

- 3.8. This is a suburb with many industrial and other commercial buildings. The roads carry many heavy vehicles. It is also the area that most residents of other suburbs use to travel south. Hornby residents are a tightly connected inter-generational community and there is a deep concern that six storey development will break up this strongly linked community. Hornby residents have indicated that they are opposed to the possibility of six storied development. At a recent Greater Hornby Residents' Association meeting that was attended by five Board members, all 60 residents present expressed opposition to the possible development of six stories. Indeed, the Board understands that the community has concerns regarding three-storied development. The Board understands that the Greater Hornby Residents Association will be making a submission on behalf of residents.
- 3.9. The Board Chairperson has spoken with Ravensdown, a fertiliser manufacturer, located in Hornby. The company expresses concern regarding the proposal for six storey development in its vicinity. There have been difficulties in the past between Ravensdown and local residents regarding the company's activities including discharges, traffic movements and noise. Ravensdown was functioning before Hornby was developed.
- 3.10. The Board is aware that Ravensdown will be making its own submission on the plan and fully supports its request. The Board suggests there is a strong constraint on residential height and a wide buffer provided between residential areas and any industrial development. There may be other housing areas close to Industrial plants where there should also be a constraint on residential height and a wide buffer provided.



### Riccarton Issues

- 3.11. The face of Riccarton will change dramatically with two defined commercial Centres. Much of Riccarton could become six stories. On Page 9 of the Council's "Have Your Say" Booklet for Plan Change 14 it is clear that the majority of centres are in Riccarton and Hornby. There are very few Town Centres in the north/north-east of Christchurch. The Board considers that Riccarton and Hornby will be overburdened by six storey intensification at the same time undermining the Central City.
- 3.12. The Board is aware that all five Riccarton Residents' Groups are strongly opposed to the proposed six stories. The issues for each are slightly different.

### Lower Riccarton

- 3.13. Deans Avenue Precinct is represented by the Deans Avenue Precinct Society and covers the area from Matai Street East to Blenheim Road and from Deans Avenue to the Railway line. This area is already zoned medium density which the residents feel comfortable with. The Plan proposes the area will be high density. There appears to be no rationale for this as the area is well outside the 600 metres walking distance from Riccarton Town. When the Board Chairperson asked Council planning staff why this area was zoned high density they indicated this was "for consistency".
- 3.14. The Board does not consider the Council should be going beyond what is mandated by Central Government and, on further consideration, the Board can see no reason why the area should not continue as medium density. The land that could be zoned High Density is the former Addington saleyards site. At a recent Annual General Meeting of the Deans Avenue Precinct Society, most residents indicated that they felt quite comfortable with this area being zoned high density residential. Please leave the remaining area as medium density.

### Riccarton House and Bush Wider Area

- 3.15. The Board supports the recognition of the importance of Riccarton Bush and the Riccarton Bush Interface. As noted above the proposals for a High-Density residential zone in Riccarton are regarded by many Riccarton residents as a breach of trust of their "good faith" investment in the area.
- 3.16. This area is represented by the Riccarton Kilburn Residents' Association. The residents of the area from Kauri Street to Matai Street have expressed particular concerns as the area will be moving to High-density (six storeys) under the Plan. Technical evidence on this area was submitted to the Independent Hearings Panel on the Christchurch Replacement District Plan chaired by Sir John Hansen in 2015, with the panel deciding to retain suburban density and residential suburban transitional density zoning, influenced by the need for particular care in ensuring appropriate residential design outcomes, especially given the established amenity values in the vicinity of Riccarton Bush, coupled with the concerns expressed by residents as to how Residential Medium Density zoning would impact on the amenity values of their neighbourhood.
- 3.17. There was considerable stress on the community at that time and many residents have expressed that they feel highly concerned to be going through this again. The Board **supports** the view of residents that this should be accepted as a "qualifying matter" given that the appropriate density was so recently judged by the Independent Hearings Panel.

- 3.18. The Board notes that the only other area maintaining low density through that Independent Hearings Panel's consideration was the Condell Avenue/St James Avenue area. In the Plan this area is designated as a heritage area.
- 3.19. The Board notes that as the foundation borough of Christchurch Riccarton is has many historical buildings: Riccarton House and Bush; Deans Cottage; Kahu Street Bridge; the farm buildings, Christchurch Boys High School and war memorial; proposed 35 Rata Street; possible recognition of Britten's Stables; and on the far side Mona Vale; Jane Deans Close has a plaque commemorating the departure of the 20<sup>th</sup> battalion to leave NZ for the Second World War; the War Memorial At Christchurch Boys' High School; the original Riccarton estate farm buildings; a large number of pre world two residential buildings; and eleven notable mature trees. Many visitors visit these places and the Board contends that the whole ambience of the area would be affected by possible six storied buildings surrounding these historical buildings. It would be cold and uninviting.
- 3.20. Riccarton House and Bush are particularly noteworthy. The Bush is over 600 years old and is an extraordinary remnant of the bush that covered Christchurch in the time of pre-European settlement. The Bush is of National Significance. Please note there was Ngai Tuahiwi involvement before the arrival of the first European settlers, the Deans brothers.
- 3.21. The landscape architect from WSP NZ focused in her report on views of Riccarton Bush. An area was suggested for lower height. (The report will be provided at a later date). However, Council planners made the decision that only partly met the suggested mapping. The Board supports that Riccarton House and Bush as a qualifying matter but suggests that a broader area be included. The two areas included in WSP's mapping, but not in the final proposal are:
- The southern side of Rata Street to Rimu Street and Kauri Street.
  - Kahu Road opposite the entrance to Riccarton House.
- 3.22. These areas are proposed to be medium density with a two storeyed height limit. The Board supports of these heights limits as a minimum but requests that suburban density is retained. There does not appear to be any clear reason to put aside the mapping of WSP.
- 3.23. The Kauri Cluster - This should be seen as a qualifying matter in its own right or included within the Riccarton House and Bush qualifying matter. The Board's preference would be to include it within the Riccarton House and Bush qualifying matter.  
The Kauri Cluster is the precinct beside Riccarton House and Bush on the southern side. It was developed into a precinct in 2007. See attached.
- 3.24. The carriageway was narrowed; grass berms were widened, street thresholds were introduced or upgraded, a water feature installed at the corner of Rata/ Rimu and native trees were planted, named in accordance with the street names - ie Rata trees for Rata Street, Rimu trees for Rimu Street. The Board understands there is history in naming the streets. When the sections were sold in 1927 by the Deans family, they wanted the streets named after native trees in honour of the original Māori people, who were there before European settlement.  
(The Board considers roadside reserve trees will be removed with medium density development).
- 3.25. The precinct nature is further developed with 30 kilometres per hour speed and long-standing parking restrictions that allows parking for the Riccarton market and shoppers at Christmas and other major shopping days. There will be little parking available for the Riccarton House Farmers market, if the area is zoned medium density.

- 3.26. This area is a precinct with the backdrop of Riccarton House and Bush. The Board requests it retains its suburban density zoning. It is an appropriate entrance to Riccarton House and Bush. If this is zoned medium density, Riccarton House and Bush will be diminished. The heritage of this area is possibly taken for granted, but will become more important in future years. With the current eight metre setback for suburban density most residents have flourishing front gardens.
- 3.27. The Board fully supports the submission by the Riccarton Bush /Kilmarnock Residents' Association that a broader area be considered to retain suburban density. There are three critical issues:
- The Board further advocates for all of Ngahere Street to be included (It does not make sense to have just one side) and similarly for Girvan Street.
  - Houses adjoining the Avon should also be included. e.g. 36a Kahu Road and adjoining houses.
  - The Board also supports the larger area as indicated by the Riccarton Bush /Kilmarnock Residents' Association. It makes sense to have a coherent Riccarton House and Bush precinct for future generations.
- 3.28. The Board has submitted on Plan Change 13 that this wider area is a significant heritage setting but does not satisfy the proposed significant framework and has argued for a change to this policy to allow the whole area to be included.
- 3.29. Matai Street has a Council tree-lined cycleway. The Board shares residents' view that if housing was to go to six stories on both sides of the street this would be an uninviting and cold part of the current tree lined Central City/University cycleway. It is also some distance from the main commercial centre. The Cycle Route was named the Supreme Winner of the National Bike to the Future Awards in 2018.
- 3.30. In addition to making the road and cycle way uninviting, six storey developments on both sides would also probably lead to the removal of trees. The Board knows through experience that a developer can choose the access to the property. If roadside trees have to be cut down to facilitate access there is little that can be done other than require replacement trees which are generally young saplings in place of mature trees. They take many years to grow.
- 3.31. The Board suggests the existing suburban density be retained in this area. This may be through an additional qualifying matter or recognition that Matai Street should never have been included because of its distance from the commercial centre.
- 3.32. The Riccarton Town Centre as previously delineated operated from Picton Avenue and its counterpart opposite Caltex Service Centre, there was a stone wall that showed Riccarton Town Centre. It appears now that Council proposes to include a suburban type shopping complex in the main commercial centre (this means that Matai Street is potentially included in the higher density area). Evidence on the walkable distance from the Town centre will be provided at the hearing.
- 3.33. Jane Deans Close Cul -de- Sac was formed and developed in the late 1990s. All of the houses are two storied with substantial gardens, some of them award-winning. There is a war memorial statue, erected soon after the street was formed post 1997, replacing the original 1948 memorial. The statue recognises the soldiers of the 20th Infantry Battalion and Armoured Regiment who lost their lives in Greece, Crete, North Africa from 1939 to 1945. An Anzac Day commemoration is held there every year to which the Board sends a representative.

The Board requests this memorial be recognised as a Heritage Item and has included this in its submission on Plan Change 13.

### **Central Riccarton**

- 3.34. Central Riccarton Residents' Association represents the area from Matipo Street to the Railway line. The area has been zoned medium density from at least 1995. This not been successful and has led to largely rental properties and a more transient population. On demolition of a house, frequently four units are built on the site often with three occupants per unit and eight cars. There is traffic congestion in the area, parking on berms and pavements, difficulties on rubbish collection days, rubbish in streets, residents at potential risk when having to park at night some distance from their residence. Much of the ward is not well served by public transport and residents complain the lack of space between houses means the sunlight is not coming in, and even with double glazing it is difficult to heat a home in winter. The Residents' Association has been active in presenting the problems to the Community Board and Council and each incoming Mayor is asked to walk around the area. However, it is proposed to create high density living in this area.
- 3.35. The Board suggests the Independent Hearings Panel walks around this area to see the current effects of medium density. The Board is totally opposed to imposing high density on an area already struggling with medium density. The Board questions the walkability of this large area and will provide evidence at the Hearing.

### **Upper Riccarton area**

- 3.36. In Upper Riccarton there are two residents' associations. The Ilam Upper Riccarton Residents' Association (IURRA) represents residents around the Bush Inn complex extending to the University of Canterbury's Dovedale Campus. The area around the Bush Inn is already highly intensified with small single or two storied units. The units house single people or couples. There is no need for six storey development in this area. The rules regarding Boarding houses were established by the Independent Hearings Panel after detailed submissions from IURRA.
- 3.37. The area around the Dovedale campus is intensifying through groups of students living in family homes. The Dovedale campus is intended as a future film school, which will include commercial filming. There are a number of boarding houses in the area i.e. houses which are let out to six or more people on a room basis. The rules regarding boarding houses were established by the previous Independent Hearings Panel
- 3.38. Further evidence will be supplied about the intensification of this area at the Hearing. There is also the question of whether the Bush Inn should be considered a Large Local Centre. The Board questions the need for so many different categories of Centres. If the Board's submission is accepted the Bush Inn Would be defined as a Local Centre which would require 14 stories.

### **Church Corner Area**

- 3.39. The Church Corner Residents' Association is a recently formed group through concerns relating to an intensive development by Kainga Ora on a previous workingmen's camp site during the earthquake. A five storied apartment block is planned for this site and over 300 people will be based on this site.
- 3.40. The current zoning is suburban density and the Board considers areas should not be moving from suburban density to high density. (Refer a requested policy change on this).

- 3.41. There are yellow lines down the Main South Road going south which means no traffic will be able to park on this road and it is difficult to enter properties. Vehicles will be entering from Ballantyne Avenue which is a quiet road, currently a suburban density residential zone.
- 3.42. St Peter's Church, Christchurch oldest Anglican Stone Church, Highly Significant in Council's Heritage listings and Class 2 in Heritage NZ listings, is across the extremely busy road. St Peter's was affected by the earthquake and has only recently been restored. It is at an extremely busy intersection and the prominence of the Church would be affected by high rise buildings on both sides either commercial or residential.

### **Halswell**

- 3.43. The Halswell Residents Association suggests that intensification should be prioritised in the central city before it occurs in the Suburbs. Some Halswell residents have expressed concern about the effects of intensification in what was formerly swampland areas. Although the area has been drained many fear that in the event of any future earthquake activity the nature of the land would want to drive back to its natural state of swampland. Refer to the video link above regarding the risk of a future earthquake.
- In addition, there is concern that Halswell is already at bottle neck during peak traffic hours and additional traffic is likely to result from the intensification proposal local with additional pressure on the road network.

### **General**

- 3.44. There is also the question whether provision for six stories is needed since development up to three stories is generally mandated across the city? Victoria Street residents have interesting information that questions "Has government overcooked intensification?". The Board is concerned that Central Government when it mandated six stories in August 2020 had no idea that three stories across the Tier One Cities would be mandated as well in November 2021.

## **4. Conclusion**

- 4.1. The Board requests that the matters set out above in relation to Plan change 14 be taken into consideration.

The Board would like to speak to its submission.



Helen Broughton

CHAIRPERSON Waipuna Halswell-Hornby-Riccarton Community Board

Dated 12 May 2023.





# CANTERBURY CONSTRUCTION REPORT<sup>©</sup>



**BLACKBURN**  
management

REGISTERED MASTER BUILDERS  
**ASSOCIATE  
MEMBER**

## MULTI-UNIT DEVELOPMENTS CHRISTCHURCH CITY





# **Canterbury Construction Report<sup>©</sup>**

## **2018 to 2022**

### **Multi-Unit Developments**

### **Christchurch City**

**Release date: January 2023**  
**This report is prepared by**  
**Blackburn Management Limited**

The data used in this report has been taken from the  
Monthly Building Consent Reports and other information provided by:

**Christchurch City Council**  
**Selwyn District Council**  
**Waimakariri District Council**  
**CoreLogic**  
**Statistics New Zealand**

#### **Please Note:**

The analysis contained in this report is based on information that has been supplied by the above mentioned Territorial Authorities and data providers, which is released as a matter of public record.

Additional information and market commentary is sought and provided by industry participants.

Although all attempts are made to verify the data where possible, no representation is made by Blackburn Management, its agents or staff as to the accuracy of this information.

This report provides an analysis of the multi-unit residential construction market in Canterbury. It focuses on new residential dwellings.

This report excludes certain data relating to rest home facilities or elderly persons housing, sleepouts or secondary buildings and relocatable buildings (not being built for a specific site).

No information in this report is provided with respect to Kāinga Ora.

Some residential consents are issued across multiple stages. Information relating to these building consent applications are only included when the final stage has been consented.

#### **Photographs, Images and Pictures**

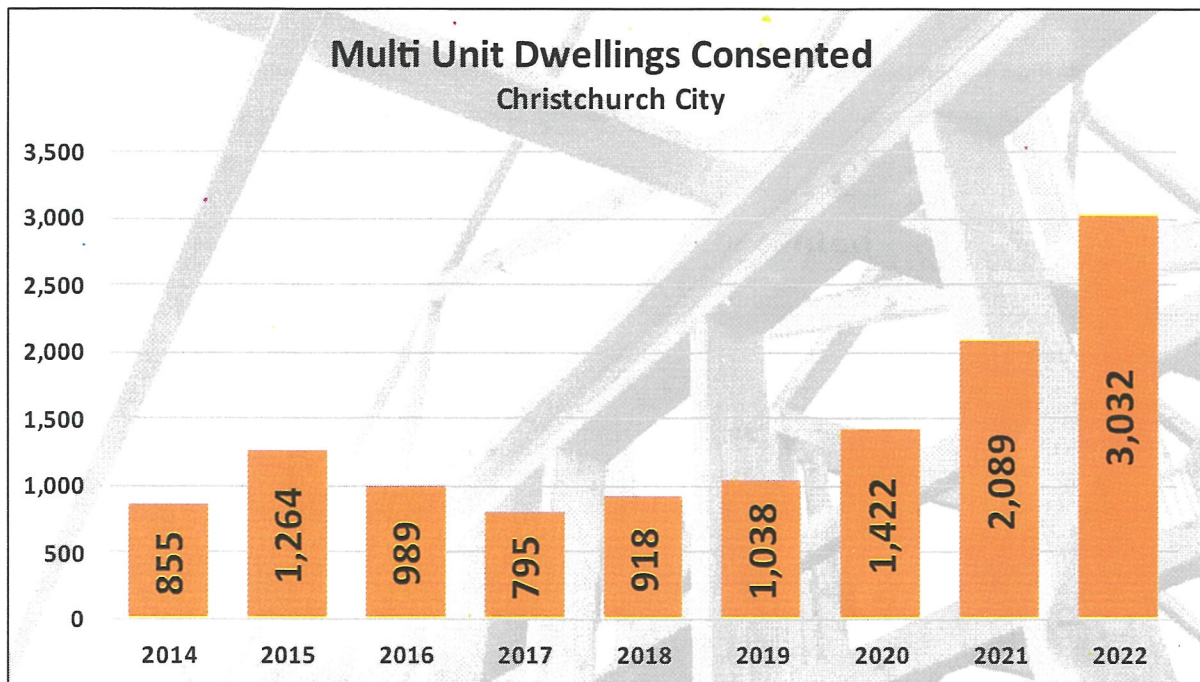
All Photographs, Images and Pictures in this report are used with permission, or are without copyright restriction in the public domain.

## Executive Summary

I believe that the market for medium density multi-unit dwellings in Christchurch is currently oversupplied (I've been saying this for the past year).

I predict that the number of new residential units being consented in Christchurch in 2023 will fall by 20% to 30% over the next 12 to 18 months.

In the 12 months to December 2022 there were 3,032 multi-unit dwellings consented across 456 building consent applications (that's an average of 6.6 units per building consent application).



This is a 45% increase (943 units) over the 2,089 multi-unit dwellings consented in 2021.

Which was a 47% increase (667 units) over the 1,418 multi-unit dwellings consented in 2020.

New residential multi-units account for almost 7 out of 10 new dwellings consented across the City in 2022.

This has been a continuing trend since 2017.

The median size of these multi-unit dwellings is just 77 m<sup>2</sup> (on average, that's about 1.5 bedrooms).

The average household occupancy of Christchurch is 2.7 persons per household...you simply can't fit 2.7 people into a 1.5 bedroom unit (not as a short or medium term housing strategy for the City).



Over the past two years, the population of Christchurch has been in decline. Not by a tremendous amount, but it's definitely not growing (-0.5% in 2021 and -0.2% in 2022). Compare this to neighboring Selwyn (+5.0% in 2022) and Waimakariri (+2.0% in 2022).

You don't need more houses when your population is not growing (certainly not at the rate we have been building them over the past couple of years). To be fair...that's a very broad statement...but you get the idea.

Almost every builder and developer I have spoken to (pretty much from the start of 2022) has told me that unit sales are down (sales appear to be down across all parts of the market, including units, individual dwellings and sections).

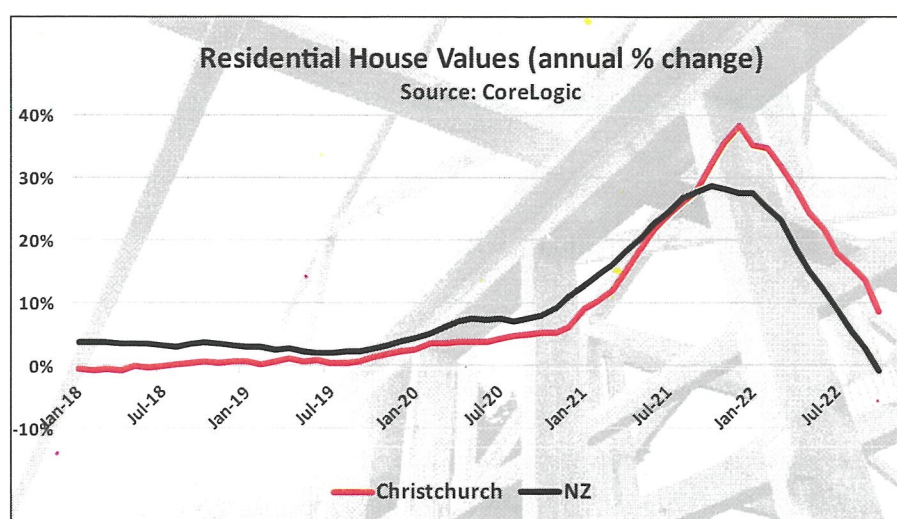
Many of the developments currently under construction were sold six or 12 months ago. With projects taking longer to sell in 2022, this will inevitably flow through to a slowdown in new building consents into 2023.

Property values aren't what they were this time last year (that's probably an understatement), but you could also argue that annual increases in value of 38.0% (December 2021, via CoreLogic) were never real and that values today aren't too far off what they would have been without the artificial bubble of 2021 and 2022.

I guess your point of view will depend on when and what you brought.

Unfortunately, this (and a projected ongoing increase in interest rates) will see a number of buyers (including builders and developers) now unable to settle these purchases, most likely forfeiting their deposit (and hopefully not much more) just to get out of the deal.

On-selling in a crowded market will further depress prices.



I suspect that the above graph probably looks like many developers sales charts.

Economically, it's going to be a tough year. A recession will make it harder to borrow money, which will be at higher interest rates. Developers will find it harder (than it already is) to find money for "spec" projects, which will inevitably be competing for fewer buyers (and most certainly, fewer investor buyers).

However, despite all of the above, it's not like the arse is going to completely fall out of the market.

Even if the market did come back by 30%, this still means that there would be somewhere around 2,000 new units consented across the city in 2023. This could still be a bit on the high side, given the limited population growth, but it often takes the building sector 12 months or more to catch up to the market.

We could see this decline continue through into 2024.

During the market crash of 2008 (following the Global Financial Crisis), building consent numbers dropped by around 45% over two years (before the earthquakes). Everything I have read and watched on in the pending economic recession suggests that 2023 won't be as bad as 2008...but how really knows?

I know many developers who are well prepared for this change in market conditions. The "writing has been on the wall" for anyone to see (if you were paying attention) for some time now. The market will slowdown...but we will keep on building, certainly not as many, but developers will adapt to the requirement of the market (what buyers want) and will change what, how many and where they build.

Unfortunately, this will be bad news for some developers who will need to redesign or potentially shelve some projects or (worst case scenario) look to sell out of others at a loss (again, on a crowded market). I expect that it will be a tough time for many builders and developers, with some not making it to the end of the year.

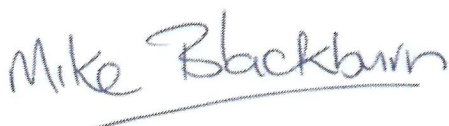
It's hard not to sound like the Grim Reaper, delivering this executive summary, but this is the state of the current market for multi-unit construction in Christchurch (and I suspect, across most of the Country).

In 2021, I issued a caution to the market, I am now upgrading that to a warning.

Anyone, working in, or building in, or investing in, or supplying to this market should read this report. It will change / crystallise your thinking on business for the coming year.

As always, I appreciate your comments and views on this report and the broader market.

Please give me a call if you have any questions.

A handwritten signature in blue ink that reads "Mike Blackburn". The signature is written in a cursive, slightly slanted style. The first name "Mike" is written above the last name "Blackburn", which is underlined.

Mike Blackburn  
January 2023.

**Report / decision to determine  
public notification, limited notification, or  
non-notification of a resource consent application**

(Sections 95A / 95B)

<b>Application Number:</b>	<b>RMA/2016/1434</b>
<b>Applicant:</b>	McConnell Property Ltd
<b>Site address:</b>	189 Deans Avenue and 9 Matai Street East
<b>Legal Description:</b>	Lot 1 DP 51050 and Lot 1 DP 6807
<b>Zoning:</b>	<b>Christchurch City Plan:</b> Living 5 (Travellers Accommodation) <b>Proposed Replacement District Plan:</b> Guest Accommodation <b>Operative Replacement District Plan:</b> n/a
<b>Overlays and map notations:</b>	Liquefaction Management Area
<b>Activity Status:</b>	<b>Christchurch City Plan:</b> Non-complying <b>Proposed Replacement District Plan:</b> Restricted discretionary <b>Operative Replacement District Plan:</b> n/a

**Description of Application:** Construct 12 townhouses, 42 apartment units, alter and add to a heritage building and setting, and remove 4 notable trees

## Introduction

The proposal is described in detail at section 3 of the applicant's AEE. In brief, the key aspects are:

- The north-western corner of the site will be redeveloped as a terrace of 12 residential townhouses, with these townhouses being a mix of two or three stories in height. The townhouses are to be accessed via a new driveway onto Darvel Street.
- The heritage-listed pump house is to be retained, and a new single storey pavilion and north-facing garden courtyard will be constructed behind it with a link into an existing doorway on the pump house's southern façade. This will be used as a café.
- The north-eastern portion of the site will be developed as a 42 unit apartment building
- The apartment building is to have parking contained within a semi-basement accessed from the existing driveway that connects onto Matai Street





A pre-application meeting was held on 19 April 2016, and the proposal was considered by the Urban Design Panel on 2 May 2016. Following lodgement of the application for resource consent, a site visit was carried out on 28/06/2016.

## The existing environment

### *The application site*

The portion of the application site used for the proposal (approximately 8189.9m<sup>2</sup>) is the northern half of an entire block bound by Deans Avenue to the east, Darvel Street to the west and Matai Street East to the north. The central and southern parts of the site are occupied by the existing hotel operation, the Chateau on the Park. The address 9 Matai Street East (271m<sup>2</sup>) sits within the northern boundary of the site, and contains the heritage pump house and some surrounding land. Existing vehicle access to the site is from Kilmarnock Street, Matai Street East and the south end of Darvel Street.

### *The surrounding environment*

The proposal site is across Deans Avenue from the north west corner of Hagley Park to the east, Christchurch Girls High School (CGHS) to the north, and residential dwellings along Darvel Street to the west. Further south there is another hotel operation on the other side of Kilmarnock Street (The Towers on the Park) and residential units. The part of CGHS which is closest to the proposed apartment building is the site of a proposed performing arts centre. The residential dwellings on Darvel Street range from single storey dwellings on their own sites to attached single and two-storey units. The existing dwellings nearest the proposal are single storey units joined at their garages but on their own sites. Deans Avenue is a four lane road classified as a major arterial road. Across Deans Avenue is a part of Hagley Park that is relatively dense with tall trees with a walking track running beneath. Further into Hagley Park is a large open space and sports fields.



Application site and surrounding area – © 2016 GeoMedia Ltd

## Planning Framework

The operative Christchurch district plans are under review. The Independent Hearings Panel has made a number of decisions on specific parts of the Proposed Replacement Christchurch District Plan, including 'Strategic Directions and Strategic Outcomes'. Some of the rules have legal effect pursuant to section 86B of the Resource Management Act, while others are fully operative or treated as operative pursuant to section 86F of the Act. The rules applicable to this proposal have been assessed and the breaches are identified below.

If this recommendation to not notify the proposal is adopted by the Officer Panel, a separate section 104 report has been prepared to allow the substantive decision to be made immediately.

### Christchurch Replacement District Plans

The site is proposed to be zoned Guest Accommodation in the proposed Christchurch Replacement District Plan. There has not yet been a decision made on the proposed zoning of this site or the Guest Accommodation zone rules. There has been no other proposed zoning for this site (i.e. Residential Medium Density), hence the proposal has been assessed under the operative City Plan zoning.

The proposal includes the address 9 Matai Street East, which has a former pump house that is listed as a Group 4 protected building under Appendix 1, Part 10 of the operative City Plan. The former pump house building and setting are proposed to be protected as a Group 2 – Significant heritage item and setting under Appendix 9.3.6.1.1 of the proposed Christchurch Replacement District Plan.

The Independent Hearings Panel has not yet released a decision on the proposed *Chapter 9 Natural and Cultural Heritage*, however under s.86B(3) a rule in a proposed plan has immediate legal effect if the rule protects historic heritage. Therefore the proposal must be considered under both the operative City Plan rules and the proposed heritage rules when determining the activity status of the proposal.

A decision on the proposed Chapter 7 Transport (Part) was released by the Independent Hearings Panel on 15/08/2015, and became operative on 18/12/2015.

The proposal is a restricted discretionary activity under the Proposed Replacement Christchurch District Plan as it breaches the following rules:

### Heritage

The proposal involves works within the heritage item and the heritage setting. The proposed works are: to seismically upgrade the unreinforced brick walls of the pump house by the introduction of steel portal frames; repoint brickwork and make plastered surfaces good; repair and repaint existing windows and doors; add a new timber floor; add a new single level pavilion to the rear of the pump house for a kitchen, utilities and seating for the café; and to landscape the setting around the pump house with a terrace, outdoor seating, a bicycle stand and access ramp.

- Pursuant to Rule 9.3.3.2.2 C1 consent is required for a controlled activity as the proposal includes heritage upgrade works. Council's control is limited to the matters set out in Clause 9.3.4.1 a to h.
- Pursuant to Rule 9.3.3.2.3 RD1 consent is required for a restricted discretionary activity as the proposal includes alteration of a heritage item. Council's discretion is limited to the matters set out in Clauses 9.3.5.1 a to l and 9.3.5.2 a to h.
- Pursuant to Rule 9.3.3.2.3 RD2 consent is required for a restricted discretionary activity as the proposal includes alteration of a heritage setting - new buildings. Council's discretion is limited to the matters set out in Clauses 9.3.5.1 a to l and 9.3.5.4 a to e.

### Transport

- Pursuant to Rule 7.2.2.2 RD1 consent is required for a restricted discretionary activity as the proposal does not achieve Rule 7.2.3.2 which seeks that at least the minimum amount of cycle parking facilities in accordance with Appendix 7.2 shall be provided on the same site as the activity. Under appendix 7.2(2)(c), staff/ residents/ tertiary students' cycle parking facilities shall be located in a covered and secure area. The proposed café requires 2 staff cycle parking spaces, and the cycle parking provided is not located in a covered area.

### Christchurch City Plan



The site is zoned Living 5 (Travellers Accommodation). Under Clause 2-5.1.1 *Residential activities and other activities (except travellers' accommodation) - all standards (Living 5 Zone)*, all standards for residential and other activities in Riccarton, Kilmarnock, Raceway and Merivale shall be as for the Living 3 Zone. Therefore, the application is to be considered under the rules for the Living 3 Zone, for both the residential activity and the café.

The Living 3 (Medium Density) zone provides principally for medium-density residential accommodation. It is anticipated that the zone provisions will encourage diverse residential development, redevelopment and infill to medium densities and moderate heights, compatible with the character of existing development in the area while maintaining a reasonable degree of open space. The exception is on the former "saleyards site" fronting Deans Avenue where greater height and densities have been allowed to reflect the site's location adjoining Hagley Park and commercial areas. Similarly, some additional height is provided for in areas of central New Brighton to reflect the area's location adjoining the district centre and coastline. Given the building densities anticipated the retention of a high level of residential amenity, through landscape planting, scale and privacy requirements, will be an essential feature of this environment.

The proposal is a non-complying activity as it breaches the following rules:

#### **Residential development**

- *Development Standard 2-4.2.7 Urban design appearance and amenity – residential and other activities* – The erection of new buildings and alterations or additions to existing buildings that result in three or more residential units including all accessory buildings, fences and walls associated with that development, alteration or addition, shall be a discretionary activity, with the exercise of the Council's discretion limited to the assessment matters listed in clause 15.2.8. The proposal would result in 54 residential units.
- *Development Standard 2-4.2.10 Ground floor habitable room - residential activities* - In the Living 3 Zone, where the permitted height limit is 11m or less at least 50% of all residential units within a development shall have a habitable space located at the ground level. Except that, any residential units fronting a road or public space, except those built over access ways, shall have a habitable room located at the ground level. Each of these habitable spaces located at the ground level shall have a minimum floor area of 12m<sup>2</sup> and a minimum internal dimension of 3m and be internally accessible to the rest of the unit. 25 of the proposed residential units (out of a total of 54 units) would have a habitable space at the ground floor. 27 of the units would need to have a habitable space at the ground floor, so the proposal is 2 units short of providing a complying number of units with habitable rooms on the ground floor.
- *Development Standard 2-4.2.11 Outdoor Living Space – residential activities* – 30m<sup>2</sup> of outdoor living space shall be provided on site for each unit. This required outdoor living space can be provided through a mix of private and communal areas, at the ground level or in balconies provided that each unit shall have private outdoor living space of at least 16m<sup>2</sup> in total. There is no communal outdoor living space identified on the site plan. All of the proposed apartment units, with the exception of apartments 2-9, are each provided with an outdoor terrace or balcony with an area of between 4.8m<sup>2</sup> and 8.5m<sup>2</sup>. Each of these private outdoor living spaces fall short of meeting the required 16m<sup>2</sup> minimum area by between 11.2m<sup>2</sup> and 7.5m<sup>2</sup>.
- *Development Standard 2-4.2.12 Service and Storage Spaces* – Each residential unit shall be provided with outdoor service, rubbish, and recycling space of 5m<sup>2</sup> with a minimum dimension of 1.5m; and a single, indoor storage space of 4m<sup>3</sup> with a minimum dimension of 1m. Except that if a communal outdoor service, rubbish, and recycling space with a minimum area of 10m<sup>2</sup> is provided within the site, the outdoor service, rubbish and recycling space may reduce to 3m<sup>2</sup> for each residential unit. Each outdoor service, rubbish, and recycling space shall not be located between the road boundary and any habitable room and shall be screened from adjoining sites, conservation or open space zones, roads, and adjoining outdoor living spaces to a height of 1.5 metres. Each of the townhouses (except townhouse 12) has been provided with an outdoor storage space of between 2-2.5m<sup>2</sup> with a 1m minimum dimension. This would be 2.5-3m<sup>2</sup> and 0.5m short of the minimum area and dimension requirements. Townhouse 12 has not been provided with an outdoor service space. A communal outdoor service space with an area of approximately 21m<sup>2</sup> is provided in the basement of the apartment units, which reduces the minimum requirement for the apartments to 3m<sup>2</sup> for each residential unit. None of the townhouses or apartment units meet the minimum area requirement for the single indoor storage space of 4m<sup>3</sup>.
- *Critical Standard 2-4.4.3 Building height – residential and other activities* – For All other parts of the Living 3 zone, except for central New Brighton, the maximum height of any building shall be 11m. The apartment building is 17.35m high at its highest point; 6.35m higher than the maximum permitted height.

#### **Café in a heritage item and setting**



- *Community Standard 2-4.3.3 Hours of Operation* – The maximum total number of hours the site shall be open to visitors, clients or deliveries for any activity other than a residential activity shall be 50 hours per week. Hours of operation shall be limited to between the hours of 0700 - 2300 Monday to Friday, and 0800 - 2300 Saturday, Sunday and public holidays. Consent is sought for 75 hours of operation per week.
- *Community Standard 2-4.3.4 Traffic generation – other activities* – For sites with frontage to local roads, the maximum number of vehicle trips per site shall be: Heavy vehicles - 2 per week, and Other vehicles - 32 per day. Consent is sought for over 32 vehicle trips per day.
- *Community Standard 2-4.3.6 Residential Coherence* – At least one person engaged in the activity shall reside permanently on the site. Consent is sought for not having someone engaged in the other / café activity residing on the site.
- *Specific Rule 10-1.3.2* – Group 3 and Group 4 Buildings, places and objects (Listed in Appendix 1) outside of the Central City. Any alteration of a Group 4 building, place or object, or the erection of any additional building(s) on a site containing a Group 4 building, place or object shall be a controlled activity, with the exercise of the Council's discretion limited to matters concerning the heritage values of a protected building, place or object.

### Notable Tree removal

- *Development Standard 10-2.3.1* – Any work defined by Clause 2.2.4 (b), (c) or (d) affecting a notable tree identified in Appendix 4, shall be a discretionary activity, with the exercise of the Council's discretion limited to the impact of the works on the tree. For the purposes of these rules, any work affecting a protected tree (whether on the site or not) shall be deemed to include removal of any tree or; the construction of any building, or laying of overhead or underground services, any sealing, paving, soil compaction, or any alteration of more than 75mm to the ground level existing prior to work commencing, any depositing of chemical or other substances harmful to the tree within 10 metres of the base of any protected tree.

The proposal includes the removal of the *Fraxinus excelsior* (English Ash) notable tree, the *Betula pendula* (Silver Birch) notable tree, the *Magnolia grandiflora* (Southern Magnolia) notable tree, and the *Eucalyptus delegatensis* (Alpine Ash) notable tree. There would be works within 10m of the English Oak (*Quercus robur*) notable tree and the Pink Horse Chestnut (*Aesculus x carnea*) notable tree.

### Adverse effects of the activity on the environment [Section 95A]

As a non-complying activity the Council's assessment is unrestricted and all actual and potential effects of this proposal must be considered. Relevant guidance is contained in the reasons for the rules breached and the relevant assessment matters as to the effects that require consideration.

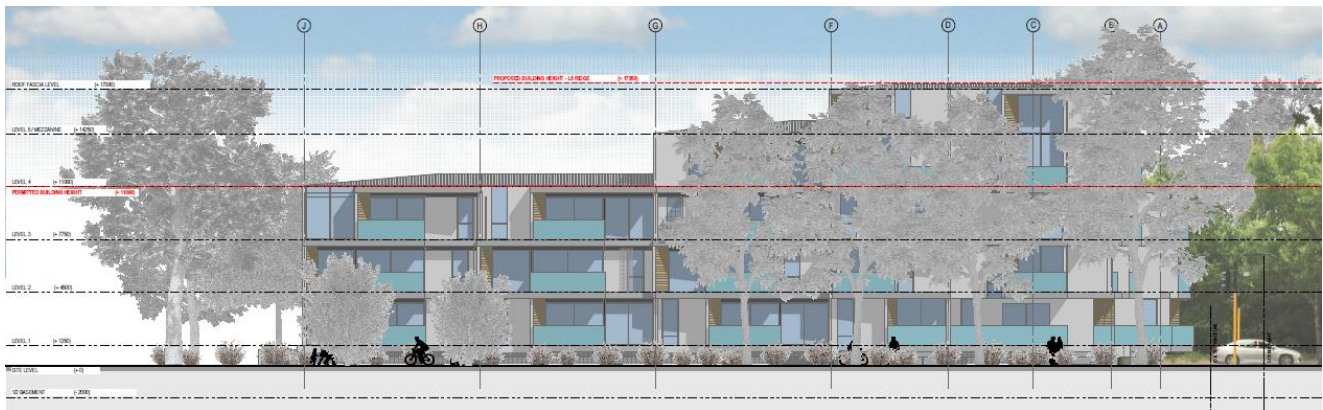
Having regard to this planning framework I consider that the adverse effects of the proposal on the environment are:

- shading, dominance and overlooking from the over-height apartment building;
- reduced onsite amenity due to undersized outdoor living spaces, service spaces and less habitable spaces at ground floor than is required;
- transport effects;
- heritage effects;
- effects on residential coherence from the café operation; and,
- effects on notable trees.

### Apartment building height - Shading, dominance and overlooking

The maximum height of any building shall be 11m, but the proposed apartment building would be 17.35m high at its highest point, exceeding the maximum by 6.35m. The highest point of the building would be located near the north east corner of the site, and the rest of the building steps down over two stories to reach the maximum height limit, as shown in the two elevations below. I consider that the adverse effects of the height exceedance relate to visual dominance, compatibility with the surroundings, overlooking, and shading.

Although Council's discretion is not restricted, Clause 2-15.2.2 provides some guidance on the relevant assessment matters for a building height exceedance, which include compatibility with other buildings in the area, visual dominance and overshadowing, privacy of neighbouring sites, and any ability to mitigate adverse effects.



Apartment east elevation



Apartment north elevation

### Visual dominance

The apartment building would be noticeably high against the lower existing buildings on the site and the open space at Hagley Park. The dominance of the building in this context would be noticeable to those moving along Deans Avenue and Matai Street East, and to users of the north west corner of Hagley Park and Christchurch Girls High School (CGHS). There is also the potential for it to be seen from the residential neighbours on Darvel Street.

The visual dominance would only be perceived for a short duration by those using Matai Street East, Deans Avenue and Hagley Park. The nearby residential sites at Darvel Street would be separated from the apartment building by approximately 150m, and space within which there would be 12 townhouses of a permitted height. CGHS would have longer duration experiences of the visual dominance, but the nearest school building would be the proposed performing arts centre which is of a similar scale.

I also consider that there are a number of mitigating factors for the visual dominance of the apartment building.

The scale and dominance of the apartment building could be balanced by the proposed 15.6m high performing arts centre to be located across Matai Street East which will be located near Matai Street East.

The north and east elevations of the apartment building have been broken up by the design of the units, so well-articulated elevations are presented to the street rather than a monotonous structure.

The retained tall trees and the proposed trees (with a minimum height at planting of 2m) located between the apartment building and the street would soften the structure and echo the type of environment present in the north west corner of Hagley Park where there are dense, tall trees.

The highest part of the apartment building is set back further than the rest of the building from the road boundary on the Matai Street East frontage, so as it gets higher and more dominant it is further distanced from other sites and public spaces, mitigating its own dominance by its layout.

The short duration of use of the nearest surrounding spaces and sites, and the mitigating factors noted above, have led me to consider that the extent of the visual dominance for nearby sites would be less than minor. Any other users of the surrounding public spaces would be experiencing the dominance of the building for short durations but given the busy nature of Deans Avenue, the heavy use of Hagley Park and prominent location of



the apartment building on the corner of the site, I consider that the extent of the visual dominance on the wider environment would be minor.



*Existing trees, proposal site at left, looking west down Matai Street East from Hagley Park*



*Existing trees at the north west corner of Hagley Park, looking east*

#### *Compatibility with the surrounding area*

The apartment building would be noticeably higher than those around it, in particular the other Hotel buildings at 189 Deans Avenue, and the nearby dwellings along Darvel Street.

There are other apartment buildings of similar heights near the edges of Hagley Park. These examples range in height and distance from the road: 26 Carlton Mill Road at approximately 22m in height and 28m from the road; 50 Carlton Mill Road at approximately 20m in height and 32m from the road; and 138 Park Terrace at approximately 15.3m in height and 30m from the road. There would be less space provided between the apartment building and the road than there has been provided with the other examples of tall apartment buildings near Hagley Park, however the space that is provided is landscaped and contains tall trees. While the setback from the site's eastern boundary is only approximately 5.5m, there is an easement with planting between the site's road boundary and the kerb of Deans Avenue, providing a setback of approximately 12m for the apartments. Hagley Park would balance the scale of the apartment building and create distance for those viewing the building in its wider surrounding environment.

The scale of the apartment building would be compatible with the school buildings at CGHS (and the proposed performing arts centre at 15.6m in height).

Council's Principal Adviser Urban Design, Hugh Nicholson, provided urban design advice for this proposal. Mr Nicholson noted that the additional height emphasizes the corner and is appropriate for and in scale with its surroundings.

I agree that the scale of the apartment building would be compatible with its surroundings, in particular the CGHS buildings and other existing apartment buildings on the edges of Hagley Park. The Townhouses provide a transition from the apartment scale to the single storey dwelling scale on the other side of Darvel Street.

I consider the apartment building would appear larger than other surrounding buildings, but that it would be appropriate for the context. I consider the incompatibility with neighbours would be noticeable but that none of the surrounding neighbours would be directly affected. The compatibility with the wider environment is greater, so I consider the extent of the incompatibility on the wider environment to be less than minor.

#### *Overlooking*

There are no existing adjoining residential neighbours for the apartment units to overlook, but the apartment building would establish indoor living areas and balconies with an elevated view of Matai Street East, CGHS, Deans Avenue and Hagley Park, and there is the potential for a view as far as Darvel Street from the highest apartment units.

I consider there would be little additional effect on privacy for the already public spaces that surround the site, although there could be some perceived effects of feeling overlooked from the apartments while using the public spaces. However, there are trees on both sides of Matai Street East and Deans Avenue which would partly screen the view from the apartment units, and to be overlooked from dwellings while using a street is a reasonable expectation within an urban setting.

The apartment building is separated from the Darvel Street dwellings by approximately 150m, which I consider to be a sufficient separation for the extent of the potential overlooking and any loss of privacy of these sites to be less than minor.

I consider any effects on nearby sites would be less than minor, due to their non-residential nature or distance from the building, and any effects on the wider environment would also be less than minor due to the more public nature of the surrounding wider environment.

#### *Shading*

A sun study of the shading effects of the apartment building was provided with the application. There are no adjoining sites, and shading effects would be on the site itself and Deans Avenue. The sun study does not show how far the shading would reach over Deans Avenue and if it would reach Hagley Park, but I consider that any shading over the nearby part of Hagley Park would be short-lived, and that the existing tree cover at the edge of the Park would create a greater shading effect than the proposed apartment building.

For these reasons, I consider there would be no shading effects on nearby sites, and any shading effects on the Hagley Park and the wider environment would be less than minor.

#### *Conclusion*

In conclusion, I consider the extent of the effects of the apartment building height (shading, overlooking and visual dominance) would be less than minor for the surrounding sites and no person will be affected. I also consider that the extent of these effects on the wider environment would be less than minor, with the exception of visual dominance which I think will be a minor effect on the wider environment.

#### On-site amenity

The proposal has undersized outdoor living spaces for the apartment units, and undersized service and storage spaces for both the townhouses and apartment units. Adverse effects of these non-compliances are reduced access to outdoor living, the balance of buildings to open space, and potentially inadequate service and storage spaces.

#### *Outdoor living*

A minimum of 30m<sup>2</sup> of outdoor living space shall be provided on site for each unit, which may be provided at ground level or in balconies provided that each unit has a private outdoor living space of at least 16m<sup>2</sup> in total. There is no communal outdoor living space identified on the site plan, and all apartment units (with the exception of apartments 2-9) are each provided with an outdoor terrace or balcony with an area of between 4.8m<sup>2</sup> and 8.5m<sup>2</sup>.

While discretion is not restricted, the assessment matters at Clause 2-15.2.12 provide some guidance on relevant matters which include adverse effects on the ability of the site to provide for outdoor living needs, alternative

provision of outdoor living spaces to meet these needs, how commensurate the reduction in outdoor living space is with the scale of the residential unit, and impacts on overall openness and amenity.

In his urban design advice, Mr Nicholson noted that each of the apartments is provided with a balcony facing either north, west (overlooking the 'village green' and internal courtyard) or east (overlooking Hagley Park). Mr Nicholson considered that 'the outdoor living spaces are well designed and will contribute to the amenity of the proposed development and there is high quality access to outdoor spaces for residents'. There are also generous landscape areas at ground level, and Hagley Park is nearby and provides an alternative space for outdoor recreation.

The reduction in outdoor living space is in proportion to the apartment units, which are inherently limited for outdoor living space. The outdoor living spaces are directly accessible from the indoor living spaces which would also have good access to sunlight and fresh air through sliding doors to the balconies. The proposal's apartment building sun study shows that all the units would receive sunlight either early or late in the day.

Due to the orientation of the balconies and the alternative nearby outdoor spaces, I consider the extent of this adverse effect would be less than minor for those living in the apartment units.

#### *Habitable spaces at ground level*

At least 50% of all residential units within this development should have a habitable space located at the ground level, but the total proposal is 2 units short of providing a complying number of units with habitable rooms on the ground floor. While discretion is not restricted, the assessment matters at Clause 2-15.2.11 provide some guidance on relevant matters. Adverse effects of this non-compliance relate to the balance of open space and buildings.

The balance of open space to buildings would not be noticeably different if there were two more units on the ground floor of the apartment building. As noted above, each unit has adequate outdoor living space for the nature for the unit, with open space onsite and nearby to balance with buildings. I consider that the extent of the imbalance between open space and buildings would be less than minor for those living in the apartment units.

#### *Outdoor service, rubbish, and recycling space*

Each residential unit shall be provided with an outdoor service, rubbish, and recycling space of 5m<sup>2</sup> with a minimum dimension of 1.5m; and a single, indoor storage space of 4m<sup>3</sup> with a minimum dimension of 1m. If a communal outdoor service, rubbish, and recycling space with a minimum area of 10m<sup>2</sup> is provided within the site, the outdoor service, rubbish and recycling space may reduce to 3m<sup>2</sup> for each residential unit.

Each of the townhouses (except townhouse 12) has been provided with an outdoor service space of between 2 and 2.5m<sup>2</sup> with a 1m minimum dimension. Townhouse 12 does not have identified outdoor storage space. A communal indoor service space with an area of approximately 21m<sup>2</sup> is provided in the basement of the apartment units, which reduces the minimum requirement for each of the apartment units to 3m<sup>2</sup>. Not all of the apartment units meet the minimum dimension requirement for the single indoor storage space of 1m.

While discretion is not restricted, the assessment matters at Clause 2-15.2.13 provide some guidance on relevant matters, and include the adequacy of communal or alternative areas provided, the ability to use those spaces, and impacts of visual amenity within the site and for the street scene. The adverse effect of the undersized service and storage spaces relates to the adequacy of the spaces that have been provided.

In his urban design advice, Mr Nicholson considered that the service and storage areas proposed to be provided were adequate.

The apartment units are provided with a space within the building in the underground parking area, which I would consider to be convenient as it is located within the building, and accessible by a lift. The apartments have not been provided with any private outdoor service, rubbish, and recycling space but this seems appropriate given the nature of a multi-storey apartment building.

Each of the townhouses (except townhouse 12) has an outdoor service, rubbish, and recycling space but not of a compliant size. Townhouse 12 has no outdoor service space, but it has two single garages. I consider the space provided would be adequate for the storage of rubbish bins, and the extra garage at townhouse 12 could accommodate bins.

Some of the apartment units do not have a storage space with a 1m minimum dimension. The first 3 floors of the building are provided an extra 8m<sup>2</sup> of storage space located in the hallway of the building that would also be available for use. I consider that the storage space provided is adequate and in proportion to the size of the apartment units.



The adverse effects of the lack of service or storage space may be felt by those using the units, but I consider that the provision of the alternative and communal service and storage spaces mitigate these effects on those who will occupy the units, so that the extent of the adverse effects would be less than minor.

No parties outside the site will be adversely affected in respect of these on-site amenity matters, nor will there be any effects on the wider environment.

#### Alterations and additions to heritage item and setting

The proposal involves works within the pump house heritage item and the surrounding heritage setting, as described in the planning framework section above.

Under the City Plan, any alteration of a Group 4 building, place or object, or the erection of any additional building(s) on a site containing a Group 4 building, place or object shall be a controlled activity, with the exercise of the Council's discretion limited to matters concerning the heritage values of a protected building, place or object.

Under the proposed Christchurch Replacement District Plan, consent is required for a controlled activity as the proposal includes heritage upgrade works to the Matai Street East pump house. Council's control is limited to the matters set out in Clause 9.3.4.1 a to h.

Consent is also required for a restricted discretionary activity for two reasons: the proposal includes alteration of a heritage item; and alteration to a heritage setting with the addition of new buildings. Council's discretion is limited to the matters set out in Clauses 9.3.5.1 a to l and 9.3.5.2 a to h, and Clauses 9.3.5.1 a to l and 9.3.5.4 a to e.

The effects of the proposed works on the heritage item and within the heritage setting (a seismic upgrade, brickwork repointing, repair and repainting of windows and doors, the addition of a new timber floor, and a new single level building at the rear of the pump house to accommodate a kitchen and seating for café use) have been assessed by the Council's Heritage Advisor, Gareth Wright, whose comments should be read in conjunction with this report.

Mr Wright noted that the seismic upgrade would avoid altering the exterior envelope of the building and that the steel frames would not be at odds with the industrial nature of the building. As details have not been provided for the works on the heritage building, they have been addressed through the recommended conditions. The elevations of the building would be largely unchanged and there would be minimal penetrations required for services. Mr Wright considered that the new pavilion would contrast with the pumphouse and be only lightly joined to it. The existing rear doors would be retained in-situ.

Mr Wright concluded that:

*The conversion of the Matai Street Pumphouse to a café is an innovative example of adaptive reuse, securing the future of this under-utilized and neglected building. The manner in which the building is being converted is also exemplary. Heritage form, fabric and appearance are being maintained, upgraded and restored. The new pavilion addition strikes the right balance between contrast and compatibility, whilst being appropriately subordinate.*

I accept Mr Wright's assessment and on this basis consider the adverse effects on heritage values to be less than minor.

#### Protected Trees

Any work defined by Clause 2.2.4 (b), (c) or (d) affecting a notable tree identified in Appendix 4, shall be a discretionary activity, with the exercise of the Council's discretion limited to the impact of the works on the tree. The work affecting the protected trees would be the construction a townhouse, the apartment building, and the decking attached to the café, and sealing, paving, or soil compaction within 10 metres of the base of two protected trees (the English Oak (*Quercus robur*) notable tree and the Pink Horse Chestnut (*Aesculus x carnea*) notable tree). The proposal also involves the removal of the *Fraxinus excelsior* (English Ash) notable tree, the *Betula pendula* (Silver Birch) notable tree, the *Magnolia grandiflora* (Southern Magnolia) notable tree, and the *Eucalyptus delegatensis* (Alpine Ash) notable tree.

Council Arborist, Mr John Thornton, considered that;

*in terms of the removal of the existing Notable trees on site i.e. that is the English Ash, Silver Birch, the Southern Magnolia and the Alpine Ash (technically missing though there is a Eucalyptus in that spot), I would expect that some reasonably large replacement trees be provided, as their removal will be a significant loss of vegetation to the landscape. Also of note is the loss of one of*



*the best Rimu trees I have seen in the city boundaries. This is both a very large example of an urban Rimu, which is also of very good form and health.*

*In particular the English Ash is a very large tree and currently has a trunk diameter of over 96 cm, is 17 m tall and 18.5 m in crown width. Although the trees have been rated as below the level to qualify for continued protection under the proposed District Plan, the criteria for inclusion is far more severe than the current assessment system uses, with which they were assessed in the 1990's. This does not mean they are not worth retaining, just that they are not at a Notable tree level according to the proposed new CTEM system of appraisal.*

*However, if new trees of a species that will grow into large enough trees to replace the ones lost are provided, this would mitigate to a reasonable extent the loss of the trees.*

*Therefore I recommend that the planting of four replacement trees ... at least 3 metres high at the time of planting for exotics, and 2 metres high for natives.*

*The replacement trees should be planted in a suitable location, preferably where they are most visible. The replacement trees are to be maintained in accordance with internationally recognised Arboricultural practice and should not be topped.*

Mr Thornton originally included a list of preferred species for the above mentioned four trees, but subsequent discussion with Mr Thornton established that a number of the species proposed for the site would be adequate.

The removal of four notable trees would reduce the amount of existing planting retained on the site. However more trees are proposed to be planted between the proposed buildings and the road boundaries, which would be in a more visible location in terms of the view of the site from the street.

The applicant has proposed a number of trees be planted on the site, and the applicant has accepted conditions recommended by Mr Thornton to manage the works within 10m of the two retained notable trees (the English Oak (*Quercus robur*) and the Pink Horse Chestnut (*Aesculus x carnea*)).

I consider the extent of the reduced amenity from loss of trees on the site would be less than minor, and that the extent of this effect on the wider environment would also be less than minor

## Transport

There are two transport related non-compliances, which relate to trip generation from the café operation (greater than the permitted 32 trips per day) and staff cycle parking provision for the café (not under cover or secure as required). The transport effects of the whole development on the surrounding transport network have also been considered. Vehicle and cycle parking numbers, parking manoeuvring, increased use of the Matai Street East and Darvel Street vehicle accesses, effects on the major cycle way along Matai Street East have been assessed by a consultant Transport Engineer from Novo Group Limited, Mr Nick Fuller, whose comments should be read in conjunction with this report.

Mr Fuller considered that more than the required number of cycle parks had been provided for the café and that the proposed provision would be acceptable. With regard to traffic generation at the vehicle accesses, Mr Fuller agreed with the integrated transport assessment provided with the application that traffic generation at the Darvel Street access would be very low and that the access would operate satisfactorily. Changes at the Kilmarnock Street access were anticipated to be negligible.

Regarding the Matai Street East vehicle access, Mr Fuller considered that 'whilst we note that it is not ideal to increase the volume of traffic using this access and therefore crossing the Major Cycle Route, we consider that it can occur safely.' The cross-section of the Matai Street East access contains a footpath, planting strip, cycle way and then the road carriageway, with no parking permitted on the proposal's side of the street. A visibility splay would also be provided, so Mr Fuller was satisfied that visibility for pedestrians would be improved and that drivers leaving the site would be able to see cyclists. Mr Fuller also considered that vehicles entering the site would need to give way and that the possible delay for them would not create adverse traffic effects for the road network. The possibility of each townhouse having their own access to Matai Street East was considered as creating worse effects than the proposal.

Regarding the trip generation associated with the café operation, Mr Fuller considered the transport effects of the café operation would be less than minor.

Mr Fuller concluded that he was satisfied that the transport effects of the proposed development on the safety and efficiency of the surrounding transport network would be less than minor. Accordingly, he could support the proposal from a traffic perspective.

I have relied on the advice of Mr Fuller and accept his advice that the transport effects of the proposal would be less than minor. I do not consider that any parties will be adversely affected in terms of traffic.

### Café operation

At least one person engaged in the activity shall reside permanently on the site, and the maximum total number of hours the site shall be open to visitors, clients or deliveries for any activity other than a residential activity shall be 50 hours per week. Consent is sought for not having someone engaged in the café activity residing on the site, and for 75 hours of operation per week. Adverse effects of the café are on the residential coherence and character of the area.

While discretion is not restricted, the assessment matters under Clauses 15.2.25 and 15.2.27 provide some guidance and include the extent the surrounding area will be dominated by residential activity, the presence of residential neighbours for residential sites, any cumulative effects of loss of residential activity in the area, traffic and pedestrian movements that are out of character with the area, inconsistent noise, disturbance and loss of privacy, and mitigating aspects of the activity.

The immediately surrounding area contains CGHS, the existing hotels on the site and across Kilmarnock Street, and Hagley Park, so the area is already dominated by non-residential activities. The café component is a part of the whole proposed development which will introduce more residential activity to the proposal site than currently exists. These proposed residential neighbours would have neighbours in the townhouses or apartment building, and would mitigate any impact on residential coherence caused by the café.

There is already pedestrian traffic along Matai Street East, being a quiet route to Hagley Park and Christchurch Girls High School. The existing major cycle way travels along the front of the proposed café site, and would already be anticipated to encourage cycle traffic along this road frontage. The proximity of the proposed café near a large open space in Hagley Park also makes the presence of a café compatible in terms of people frequenting the area.

Given the receiving environment and context, I consider the adverse effects of the proposed café operation (residential coherence and pedestrian, bicycle and vehicle traffic, and additional noise) on surrounding neighbours and the wider environment would be less than minor.

### Urban design

The proposal would result in 54 residential units, making it a restricted discretionary activity, to be assessed against the urban design matters listed in Clause 15.2.8. The council's discretion is not limited, but the assessment matters listed in Clause 15.2.8 provide some guidance to establish whether the proposal achieves a good outcome in terms of urban design principles. For completeness, I have summarised the advice from Council's Principal Adviser Urban Design, Hugh Nicholson, whose comments should be read in conjunction with this report.

Mr Nicholson made a number of points about the visual effects of the scale of the proposed buildings on the site and context. The proposed townhouses were considered to be of an appropriate scale for Matai Street East, and the residential components appropriately address the street. In particular, the ground floor living areas of the proposed apartments would provide for some interaction with the street, and the articulation of the proposed buildings would provide visual interest and human scale.

Mr Nicholson concluded that:

*In general this is a high quality proposal which will provide an attractive medium density living environment adjacent to Hagley Park and the existing Chateau on the Park hotel. The residential terrace housing and apartments are well-designed and the extra height in the proposed apartment building overlooking the park is appropriate reinforcing the corner and providing a high quality living environment with views over Hagley Park.*

I have relied on the advice of Mr Nicholson and accept his advice that the proposal is of high quality and takes into account the relevant urban design principles.

Both the townhouses and the apartment building present a large amount of solid built form to the street, but for the reasons discussed above I agree that the development is appropriate for the context, and the units at ground level would connect with the street frontage. The articulated form of the townhouses and apartment building avoid a monotonous structure on the street front, and parking and garages have been mostly kept away from the surrounding streets. Trees have been retained and while some are being removed there are more proposed to be planted, many between the buildings and the road boundaries.

I only consider the height above ground level of the apartment building's ground floor (1.25m above ground level) to present an adverse visual effect to the street frontages on Deans Avenue and Matai Street East because in the context of the whole building the height of the first floor would not be obvious when viewed at a greater distance. The visual impact of the ground floor height is mitigated by planting and direct accesses to courtyards which creates a more human scale at ground level. I consider that CGHS and the performing arts centre, and users of the north west corner of Hagley Park may notice the apartment building's ground floor design, but only for short durations. I therefore consider this adverse effect to be less than minor for surrounding sites and the wider environment.

### Conclusion

Due to the nature of nearby neighbours and buildings, the separation provided between the proposed apartment building and the nearest existing residential dwellings, and the balancing and mitigating effect of Hagley Park and the existing and proposed trees, I have considered that the extent of the effects of the proposal on nearby residential neighbours and users of CGHS, Hagley Park and the surrounding streets would be less than minor.

While I consider that most of the effects are not of a scale to adversely affect any particular persons who might own or occupy nearby sites, I have concluded that the extent of the visual dominance of the apartment building on the wider environment would be minor. This is because the scale of the building would be noticeable to the general public but would not have a significant adverse impact as it is appropriate for its context.

Pursuant to Section 95E(1) of the Act a person is not deemed affected by an activity where the adverse effects are less than minor, hence no persons are considered to be adversely affected.

### **Recovery Plans and Regeneration Plans**

Section 60((2) of the Greater Christchurch Regeneration Act 2016 requires that decisions and recommendations on resource consent applications are not inconsistent with Recovery Plans and Regeneration Plans.

I consider that non-notification of the proposal is not inconsistent with the Christchurch Central Recovery Plan, which seeks to enable residential activity within the Central City as the proposal is likely to support recovery of the Central City despite not being located within the four avenues.

There are no Regeneration Plans relevant to this application.

### **Special circumstances [Section 95A(4)]**

There are no special circumstances or other aspects of the application that warrant public notification of this application.

### **RECOMMENDATION ON PUBLIC NOTIFICATION**

That, for the reasons outlined above, the application **need not be publicly notified** in accordance with Section 95A of the Resource Management Act 1991.

### **Persons who may be adversely affected by the activity [Section 95E]**

As concluded above, I consider that the effects of the proposal are not of a scale to adversely affect any particular persons, including those who might own or occupy nearby sites. The extent of any effects on owners or occupiers of the surrounding sites have been assessed as less than minor.

### Objective 3.3.2 of the Christchurch Replacement District Plan

Chapter 3 of the Operative Replacement District Plan contains a number of high level strategic objectives to guide the recovery and future development of the City. Objective 3.3.2 states that requirements for notification and written approval are to be minimised when implementing the Plan. A decision not to notify the application is consistent with this objective.

### RECOMMENDATION ON LIMITED NOTIFICATION OR NON-NOTIFICATION

That the application be processed on a **non-notified** basis in accordance with Sections 95A – 95F of the Resource Management Act 1991.

**Reported and recommended by:** Shona Jowett, Planner

**Date:** 22 August 2016

**Reviewed by:** Ruth Markham-Short, Planner

**Date:** 22 August 2016

### Decision

That the above recommendation be adopted for the reasons outlined in the report.

**Delegated officer:**



Christofferson, Andy  
23/08/2016 2:12 PM  
Planning Team Leader

## Report / Decision on Non-notified Resource Consent Application

(Sections 104 / 104B /104D)

<b>Application Number:</b>	<b>RMA/2016/1434</b>
<b>Applicant:</b>	McConnell Property Ltd
<b>Site address:</b>	189 Deans Avenue and 9 Matai Street East
<b>Legal Description:</b>	Lot 1 DP 51050 and Lot 1 DP 6807
<b>Zoning:</b>	<b>Christchurch City Plan:</b> Living 5 (Travellers Accommodation) <b>Proposed Replacement District Plan:</b> Guest Accommodation <b>Operative Replacement District Plan:</b> n/a
<b>Overlays and map notations:</b>	Liquefaction Management Area
<b>Activity Status:</b>	<b>Christchurch City Plan:</b> Non-complying <b>Proposed Replacement District Plan:</b> Restricted discretionary <b>Operative Replacement District Plan:</b> n/a

**Description of Application:** Construct 12 townhouses, 42 apartment units, alter and add to a heritage building and setting, and remove 4 notable trees

## Introduction

The proposal is described in detail at section 3 of the applicant's AEE. In brief, the key aspects are:

- The northwestern corner of the site will be redeveloped as a terrace of 12 residential townhouses, with these townhouses being a mix of two or three stories in height. The townhouses are to be accessed via a new driveway onto Darvel Street.
- The heritage-listed pump house is to be retained, and a new single storey pavilion and north-facing garden courtyard will be constructed behind it with a link into an existing doorway on the pump house's southern façade. This will be used as a café.
- The northeastern portion of the site will be developed as a 42 unit apartment building
- The building is to have parking contained within a semi-basement accessed from the existing driveway that connects onto Matai Street





## The existing environment

A pre-application meeting was held on 19 April 2016, and the proposal was considered by the Urban Design Panel on 2 May 2016. Following lodgement of the application for resource consent, a site visit was carried out on 28/06/2016.

### *The application site*

The portion of the application site used for the proposal (approximately 8189.9m<sup>2</sup>) is the northern half of an entire block bound by Deans Avenue to the east, Darvel Street to the west and Matai Street East to the north. The central and southern parts of the site are occupied by the existing hotel operation, the Chateau on the Park. The address 9 Matai Street East (271m<sup>2</sup>) sits within the northern boundary of the site, and contains the heritage pump house and some surrounding land. Existing vehicle access to the site is from Kilmarnock Street, Matai Street East and the south end of Darvel Street.

### *The surrounding environment*

The proposal site is across Deans Avenue from the north west corner of Hagley Park to the east, Christchurch Girls High School (CGHS) to the north, and residential dwellings along Darvel Street to the west. Further south there is another hotel operation on the other side of Kilmarnock Street (The Towers on the Park) and residential units. The part of CGHS which is closest to the proposed apartment building is the site of a proposed performing arts centre. The residential dwellings on Darvel Street range from single storey dwellings on their own sites to attached single and two-storey units. The existing dwellings nearest the proposal are single storey units joined at their garages but on their own sites. Deans Avenue is a four lane road classified as a major arterial road. Across Deans Avenue is a part of Hagley Park that is relatively dense with tall trees with a walking track running beneath. Further into Hagley Park is a large open space and sports fields.



Application site and surrounding area – © 2016 GeoMedia Ltd

## Planning Framework

The operative Christchurch district plans are under review. The Independent Hearings Panel has made a number of decisions on specific parts of the Proposed Replacement Christchurch District Plan, including 'Strategic



Directions and Strategic Outcomes'. Some of the rules have legal effect pursuant to section 86B of the Resource Management Act, while others are fully operative or treated as operative pursuant to section 86F of the Act. The rules applicable to this proposal have been assessed and the breaches are identified below. The operative Christchurch district plans are under review. The Independent Hearings Panel has made a number of decisions on specific parts of the plan, including 'Strategic Directions and Strategic Outcomes'. Some of the rules have legal effect pursuant to section 86B of the Resource Management Act, while others are fully operative or treated as operative pursuant to section 86F of the Act. The rules applicable to this proposal have been assessed and the breaches are identified below. Relevant objectives and policies are discussed in a later section of this report.

## Christchurch Replacement District Plans

The site is proposed to be zoned Guest Accommodation in the proposed Christchurch Replacement District Plan. There has not yet been a decision made on the proposed zoning of this site or the Guest Accommodation zone rules. There has been no other proposed zoning for this site (i.e. Residential Medium Density), hence the proposal has been assessed under the operative City Plan zoning.

The proposal includes the address 9 Matai Street East, which has a former pump house that is listed as a Group 4 protected building under Appendix 1, Part 10 of the operative City Plan. The former pump house building and setting are proposed to be protected as a Group 2 – Significant heritage item and setting under Appendix 9.3.6.1.1 of the proposed Christchurch Replacement District Plan.

The Independent Hearings Panel has not yet released a decision on the proposed *Chapter 9 Natural and Cultural Heritage*, however under s.86B(3) a rule in a proposed plan has immediate legal effect if the rule protects historic heritage. Therefore the proposal must be considered under both the operative City Plan rules and the proposed heritage rules when determining the activity status of the proposal.

A decision on the proposed Chapter 7 Transport (Part) was released by the Independent Hearings Panel on 15/08/2015, and became operative on 18/12/2015.

The proposal is a restricted discretionary activity under the Proposed Replacement Christchurch District Plan as it breaches the following rules:

## Heritage

The proposal involves works within the heritage item and the heritage setting. The proposed works are: to seismically upgrade the unreinforced brick walls of the pump house by the introduction of steel portal frames; repoint brickwork and make plastered surfaces good; repair and repaint existing windows and doors; add a new timber floor; add a new single level pavilion to the rear of the pump house for a kitchen, utilities and seating for the café; and to landscape the setting around the pump house with a terrace, outdoor seating, a bicycle stand and access ramp.

- Pursuant to Rule 9.3.3.2.2 C1 consent is required for a controlled activity as the proposal includes heritage upgrade works. Council's control is limited to the matters set out in Clause 9.3.4.1 a to h.
- Pursuant to Rule 9.3.3.2.3 RD1 consent is required for a restricted discretionary activity as the proposal includes alteration of a heritage item. Council's discretion is limited to the matters set out in Clauses 9.3.5.1 a to l and 9.3.5.2 a to h.
- Pursuant to Rule 9.3.3.2.3 RD2 consent is required for a restricted discretionary activity as the proposal includes alteration of a heritage setting - new buildings. Council's discretion is limited to the matters set out in Clauses 9.3.5.1 a to l and 9.3.5.4 a to e.

## Transport

- Pursuant to Rule 7.2.2.2 RD1 consent is required for a restricted discretionary activity as the proposal does not achieve Rule 7.2.3.2 which seeks that at least the minimum amount of cycle parking facilities in accordance with Appendix 7.2 shall be provided on the same site as the activity. Under appendix 7.2(2)(c), staff/ residents/ tertiary students' cycle parking facilities shall be located in a covered and secure area. The proposed café requires 2 staff cycle parking spaces, and the cycle parking provided is not located in a covered area.

## Christchurch City Plan

The site is zoned Living 5 (Travellers Accommodation). Under clause 2-5.1.1 *Residential activities and other activities (except travellers' accommodation) - all standards (Living 5 Zone)*, all standards for residential and other activities in Riccarton, Kilmarnock, Raceway and Merivale shall be as for the Living 3 Zone. Therefore, the application is to be considered under the rules for the Living 3 Zone, for both the residential activity and the café.

The Living 3 (Medium Density) zone provides principally for medium-density residential accommodation. It is anticipated that the zone provisions will encourage diverse residential development, redevelopment and infill to medium densities and moderate heights, compatible with the character of existing development in the area while maintaining a reasonable degree of open space. The exception is on the former "saleyards site" fronting Deans Avenue where greater height and densities have been allowed to reflect the site's location adjoining Hagley Park and commercial areas. Similarly, some additional height is provided for in areas of central New Brighton to reflect the area's location adjoining the district centre and coastline. Given the building densities anticipated the retention of a high level of residential amenity, through landscape planting, scale and privacy requirements, will be an essential feature of this environment.

The proposal is a non-complying activity as it breaches the following rules:

### **Residential development**

- *Development Standard 2-4.2.7 Urban design appearance and amenity – residential and other activities* – The erection of new buildings and alterations or additions to existing buildings that result in three or more residential units including all accessory buildings, fences and walls associated with that development, alteration or addition, shall be a discretionary activity, with the exercise of the Council's discretion limited to the assessment matters listed in clause 15.2.8. The proposal would result in 54 residential units.
- *Development Standard 2-4.2.10 Ground floor habitable room - residential activities* - In the Living 3 Zone, where the permitted height limit is 11m or less at least 50% of all residential units within a development shall have a habitable space located at the ground level. Except that, any residential units fronting a road or public space, except those built over access ways, shall have a habitable room located at the ground level. Each of these habitable spaces located at the ground level shall have a minimum floor area of 12m<sup>2</sup> and a minimum internal dimension of 3m and be internally accessible to the rest of the unit. 25 of the proposed residential units (out of a total of 54 units) would have a habitable space at the ground floor. 27 of the units would need to have a habitable space at the ground floor, so the proposal is 2 units short of providing a complying number of units with habitable rooms on the ground floor.
- *Development Standard 2-4.2.11 Outdoor Living Space – residential activities* – 30m<sup>2</sup> of outdoor living space shall be provided on site for each unit. This required outdoor living space can be provided through a mix of private and communal areas, at the ground level or in balconies provided that each unit shall have private outdoor living space of at least 16m<sup>2</sup> in total. There is no communal outdoor living space identified on the site plan. All of the proposed apartment unit, with the exception of apartments 2-9, are each provided with an outdoor terrace or balcony with an area of between 4.8m<sup>2</sup> and 8.5m<sup>2</sup>. Each of these private outdoor living spaces fall short of meeting the required 16m<sup>2</sup> minimum area by between 11.2m<sup>2</sup> and 7.5m<sup>2</sup>.
- *Development Standard 2-4.2.12 Service and Storage Spaces* – Each residential unit shall be provided with outdoor service, rubbish, and recycling space of 5m<sup>2</sup> with a minimum dimension of 1.5m; and a single, indoor storage space of 4m<sup>3</sup> with a minimum dimension of 1m. Except that if a communal outdoor service, rubbish, and recycling space with a minimum area of 10m<sup>2</sup> is provided within the site, the outdoor service, rubbish and recycling space may reduce to 3m<sup>2</sup> for each residential unit. Each outdoor service, rubbish, and recycling space shall not be located between the road boundary and any habitable room and shall be screened from adjoining sites, conservation or open space zones, roads, and adjoining outdoor living spaces to a height of 1.5 metres. Each of the townhouses (except townhouse 12) has been provided with an outdoor storage space of between 2-2.5m<sup>2</sup> with a 1m minimum dimension. This would be 2.5-3m<sup>2</sup> and 0.5m short of the minimum area and dimension requirements. Townhouse 12 has not been provided with an outdoor service space. A communal outdoor service space with an area of approximately 21m<sup>2</sup> is provided in the basement of the apartment units, which reduces the minimum requirement for the apartments to 3m<sup>2</sup> for each residential unit. None of the townhouses or apartment units meet the minimum area requirement for the single indoor storage space of 4m<sup>3</sup>.
- *Critical Standard 2-4.4.3 Building height – residential and other activities* – For All other parts of the Living 3 zone, except for central New Brighton, the maximum height of any building shall be 11m. The apartment building is 17.35m high at its highest point; 6.35m higher than the maximum permitted height.

### **Café in a heritage item and setting**

- *Community Standard 2-4.3.3 Hours of Operation* – The maximum total number of hours the site shall be open to visitors, clients or deliveries for any activity other than a residential activity shall be 50 hours per week. Hours of operation shall be limited to between the hours of 0700 - 2300 Monday to Friday, and 0800 - 2300 Saturday, Sunday and public holidays. Consent is sought for 75 hours of operation per week.
- *Community Standard 2-4.3.4 Traffic generation – other activities* – For sites with frontage to local roads, the maximum number of vehicle trips per site shall be: Heavy vehicles - 2 per week, and Other vehicles - 32 per day. Consent is sought for over 32 vehicle trips per day.
- *Community Standard 2-4.3.6 Residential Coherence* – At least one person engaged in the activity shall reside permanently on the site. Consent is sought for not having someone engaged in the other / café activity residing on the site.
- *Specific Rule 10-1.3.2* – Group 3 and Group 4 Buildings, places and objects (Listed in Appendix 1) outside of the Central City. Any alteration of a Group 4 building, place or object, or the erection of any additional building(s) on a site containing a Group 4 building, place or object shall be a controlled activity, with the exercise of the Council's discretion limited to matters concerning the heritage values of a protected building, place or object.

### Notable Tree removal

- *Development Standard 10-2.3.1* – Any work defined by Clause 2.2.4 (b), (c) or (d) affecting a notable tree identified in Appendix 4, shall be a discretionary activity, with the exercise of the Council's discretion limited to the impact of the works on the tree. For the purposes of these rules, any work affecting a protected tree (whether on the site or not) shall be deemed to include removal of any tree or; the construction of any building, or laying of overhead or underground services, any sealing, paving, soil compaction, or any alteration of more than 75mm to the ground level existing prior to work commencing, any depositing of chemical or other substances harmful to the tree within 10 metres of the base of any protected tree.

The proposal includes the removal of the *Fraxinus excelsior* (English Ash) notable tree, the *Betula pendula* (Silver Birch) notable tree, the *Magnolia grandiflora* (Southern Magnolia) notable tree, and the *Eucalyptus delegatensis* (Alpine Ash) notable tree. There would be works within 10m of the English Oak (*Quercus robur*) notable tree and the Pink Horse Chestnut (*Aesculus x carnea*) notable tree.

<b>Actual and potential effects on the environment of allowing the activity [Section 104(1)]</b>
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As a non-complying activity the Council's assessment is unrestricted and all actual and potential effects of this proposal must be considered. Relevant guidance is contained in the reasons for the rules breached and the relevant assessment matters as to the effects that require consideration.

Having regard to this planning framework I consider that the adverse effects of the proposal on the environment are:

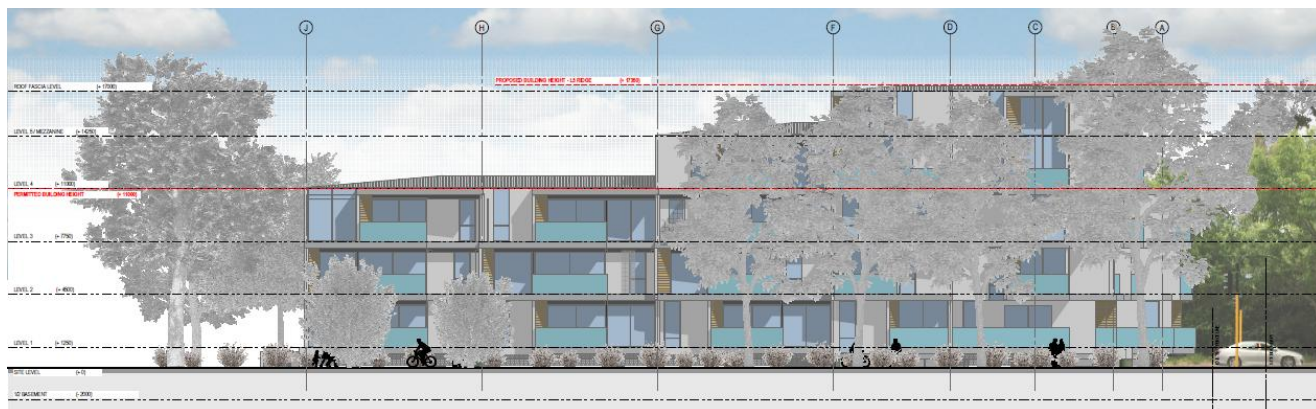
- shading, dominance and overlooking from the over-height apartment building;
- reduced onsite amenity due to undersized outdoor living spaces, service spaces and less habitable spaces at ground floor than is required;
- transport effects;
- heritage effects;
- effects on residential coherence from the café operation; and,
- effects on notable trees.

### Apartment building height - Shading, dominance and overlooking

The maximum height of any building shall be 11m, but the proposed apartment building would be 17.35m high at its highest point, exceeding the maximum by 6.35m. The highest point of the building would be located near the north east corner of the site, and the rest of the building steps down over two stories to reach the maximum height limit, as shown in the two elevations below. I consider that the adverse effects of the height exceedance relate to visual dominance, compatibility with the surroundings, overlooking, and shading.

Although Council's discretion is not restricted, Clause 2-15.2.2 provides some guidance on the relevant assessment matters for a building height exceedance, which include compatibility with other buildings in the area, visual dominance and overshadowing, privacy of neighbouring sites, and any ability to mitigate adverse effects.





Apartment east elevation



Apartment north elevation

### Visual dominance

The apartment building would be noticeably high against the lower existing buildings on the site and the open space at Hagley Park. The dominance of the building in this context would be noticeable to those moving along Deans Avenue and Matai Street East, and to users of the north west corner of Hagley Park and Christchurch Girls High School (CGHS). There is also the potential for it to be seen from the residential neighbours on Darvel Street.

The visual dominance would only be perceived for a short duration by those using Matai Street East, Deans Avenue and Hagley Park. The nearby residential sites at Darvel Street would be separated from the apartment building by approximately 150m, and space within which there would be 12 townhouses of a permitted height. CGHS would have longer duration experiences of the visual dominance, but the nearest school building would be the proposed performing arts centre which is of a similar scale.

I also consider that there are a number of mitigating factors for the visual dominance of the apartment building.

The scale and dominance of the apartment building could be balanced by the proposed 15.6m high performing arts centre to be located across Matai Street East which will be located near Matai Street East.

The north and east elevations of the apartment building have been broken up by the design of the units, so well-articulated elevations are presented to the street rather than a monotonous structure.

The retained tall trees and the proposed trees (with a minimum height at planting of 2m) located between the apartment building and the street would soften the structure and echo the type of environment present in the north west corner of Hagley Park where there are dense, tall trees.

The highest part of the apartment building is set back further than the rest of the building from the road boundary on the Matai Street East frontage, so as it gets higher and more dominant it is further distanced from other sites and public spaces, mitigating its own dominance by its layout.

The short duration of use of the nearest surrounding spaces and sites, and the mitigating factors noted above, have led me to consider that the extent of the visual dominance for nearby sites would be less than minor. Any other users of the surrounding public spaces would be experiencing the dominance of the building for short durations but given the busy nature of Deans Avenue, the heavy use of Hagley Park and prominent location of



the apartment building on the corner of the site, I consider that the extent of the visual dominance on the wider environment would be acceptable.



*Existing trees, proposal site at left, looking west down Matai Street East from Hagley Park*



*Existing trees at the north west corner of Hagley Park, looking east*

#### *Compatibility with the surrounding area*

The apartment building would be noticeably higher than those around it, in particular the other Hotel buildings at 189 Deans Avenue, and the nearby dwellings along Darvel Street.

There are other apartment buildings of similar heights near the edges of Hagley Park. These examples range in height and distance from the road: 26 Carlton Mill Road at approximately 22m in height and 28m from the road; 50 Carlton Mill Road at approximately 20m in height and 32m from the road; and 138 Park Terrace at approximately 15.3m in height and 30m from the road. There would be less space provided between the apartment building and the road than there has been provided with the other examples of tall apartment buildings near Hagley Park, however the space that is provided is landscaped and contains tall trees. While the setback from the site's eastern boundary is only approximately 5.5m, there is an easement with planting between the site's road boundary and the kerb of Deans Avenue, providing a setback of approximately 12m for the apartments. Hagley Park would balance the scale of the apartment building and create distance for those viewing the building in its wider surrounding environment.

The scale of the apartment building would be compatible with the school buildings at CGHS (and the proposed performing arts centre at 15.6m in height).

Council's Principal Adviser Urban Design, Hugh Nicholson, provided urban design advice for this proposal. Mr Nicholson noted that the additional height emphasizes the corner and is appropriate for and in scale with its surroundings.



I agree that the scale of the apartment building would be compatible with its surroundings, in particular the CGHS buildings and other existing apartment buildings on the edges of Hagley Park. The Townhouses provide a transition from the apartment scale to the single storey dwelling scale on the other side of Darvel Street.

I consider the apartment building would appear larger than other surrounding buildings, but that it would be appropriate for the context.

I consider that the extent of the dominance from the over-height apartment building is acceptable.

#### *Overlooking*

There are no existing adjoining residential neighbours for the apartment units to overlook, but the apartment building would establish indoor living areas and balconies with an elevated view of Matai Street East, CGHS, Deans Avenue and Hagley Park, and there is the potential for a view as far as Darvel Street from the highest apartment units.

I consider there would be little additional effect on privacy for the already public spaces that surround the site, although there could be some perceived effects of feeling overlooked from the apartments while using the public spaces. However, there are trees on both sides of Matai Street East and Deans Avenue which would partly screen the view from the apartment units, and to be overlooked from dwellings while using a street is a reasonable expectation within an urban setting. I note that this can be seen as a positive effect in some situations by providing passive surveillance opportunities and enhancing neighbourhood safety.

The apartment building is separated from the Darvel Street dwellings by approximately 150m, which I consider to be a sufficient separation for the extent of the potential overlooking and any loss of privacy of these sites to be acceptable.

I consider any effects on nearby sites, due to their non-residential nature or distance from the building, and any effects on the wider environment would be acceptable

#### *Shading*

A sun study of the shading effects of the apartment building was provided with the application. There are no adjoining sites, and shading effects would be on the site itself and Deans Avenue. The sun study does not show how far the shading would reach over Deans Avenue and if it would reach Hagley Park, but I consider that any shading over the nearby part of Hagley Park would be short-lived, and that the existing tree cover at the edge of the Park would create a greater shading effect than the proposed apartment building.

I consider that the extent of the shading effect of the apartment building is acceptable.

#### *Conclusion*

In conclusion, I consider that the adverse effects of the apartment building height (shading, overlooking and visual dominance) are acceptable, given the site's context.

#### On-site amenity

The proposal has undersized outdoor living spaces for the apartment units, and undersized service and storage spaces for both the townhouses and apartment units. Adverse effects of these non-compliances are reduced access to outdoor living, the balance of buildings to open space, and potentially inadequate service and storage spaces.

#### *Outdoor living*

A minimum of 30m<sup>2</sup> of outdoor living space shall be provided on site for each unit, which may be provided at ground level or in balconies provided that each unit has a private outdoor living space of at least 16m<sup>2</sup> in total. There is no communal outdoor living space identified on the site plan, and all apartment units (with the exception of apartments 2-9) are each provided with an outdoor terrace or balcony with an area of between 4.8m<sup>2</sup> and 8.5m<sup>2</sup>.

While discretion is not restricted, the assessment matters at Clause 2-15.2.12 provide some guidance on relevant matters which include adverse effects on the ability of the site to provide for outdoor living needs, alternative provision of outdoor living spaces to meet these needs, how commensurate the reduction in outdoor living space is with the scale of the residential unit, and impacts on overall openness and amenity.

In his urban design advice, Mr Nicholson noted that each of the apartments is provided with a balcony facing either north, west (overlooking the 'village green' and internal courtyard) or east (overlooking Hagley Park). Mr Nicholson considered that 'the outdoor living spaces are well designed and will contribute to the amenity of the proposed development and there is high quality access to outdoor spaces for residents'. There are also generous landscape areas at ground level, and Hagley Park is nearby and provides an alternative space for outdoor recreation.

The reduction in outdoor living space is in proportion to the apartment units, which are inherently limited for outdoor living space. The outdoor living spaces are directly accessible from the indoor living spaces which would also have good access to sunlight and fresh air through sliding doors to the balconies. The proposal's apartment building sun study shows that all the units would receive sunlight either early or late in the day.

Due to the orientation of the balconies and the alternative nearby outdoor spaces, I consider that the provision of outdoor living space for the apartment building units will be adequate for the needs of future residents and therefore acceptable.

### *Habitable spaces at ground level*

At least 50% of all residential units within this development should have a habitable space located at the ground level, but the total proposal is 2 units short of providing a complying number of units with habitable rooms on the ground floor. While discretion is not restricted, the assessment matters at Clause 2-15.2.11 provide some guidance on relevant matters. Adverse effects of this non-compliance relate to the balance of open space and buildings.

The balance of open space to buildings would not be noticeably different if there were two more units on the ground floor of the apartment building. As noted above, each unit has adequate outdoor living space for the nature for the unit, with open space onsite and nearby to balance with buildings. I consider that the balance between open space and buildings in the proposal is acceptable.

### *Outdoor service, rubbish, and recycling space*

Each residential unit shall be provided with an outdoor service, rubbish, and recycling space of 5m<sup>2</sup> with a minimum dimension of 1.5m; and a single, indoor storage space of 4m<sup>3</sup> with a minimum dimension of 1m. If a communal outdoor service, rubbish, and recycling space with a minimum area of 10m<sup>2</sup> is provided within the site, the outdoor service, rubbish and recycling space may reduce to 3m<sup>2</sup> for each residential unit.

Each of the townhouses (except townhouse 12) has been provided with an outdoor service space of between 2 and 2.5m<sup>2</sup> with a 1m minimum dimension. Townhouse 12 does not have identified outdoor storage space. A communal indoor service space with an area of approximately 21m<sup>2</sup> is provided in the basement of the apartment units, which reduces the minimum requirement for each of the apartment units to 3m<sup>2</sup>. Not all of the apartment units meet the minimum dimension requirement for the single indoor storage space of 1m.

While discretion is not restricted, the assessment matters at Clause 2-15.2.13 provide some guidance on relevant matters, and include the adequacy of communal or alternative areas provided, the ability to use those spaces, and impacts of visual amenity within the site and for the street scene. The adverse effect of the undersized service and storage spaces relates to the adequacy of the spaces that have been provided.

In his urban design advice, Mr Nicholson considered that the service and storage areas proposed to be provided were adequate.

The apartment units are provided with a space within the building in the underground parking area, which I would consider to be convenient as it is located within the building, and accessible by a lift. The apartments have not been provided with any private outdoor service, rubbish, and recycling space but this seems appropriate given the nature of a multi-storey apartment building.

Each of the townhouses (except townhouse 12) has an outdoor service, rubbish, and recycling space but not of a compliant size. Townhouse 12 has no outdoor service space, but it has two single garages. I consider the space provided would be adequate for the storage of rubbish bins, and the extra garage at townhouse 12 could accommodate bins.

Some of the apartment units do not have a storage space with a 1m minimum dimension. The first 3 floors of the building are provided an extra 8m<sup>2</sup> of storage space located in the hallway of the building that would also be available for use. I consider that the storage space provided is adequate and in proportion to the size of the apartment units.

The adverse effects of the lack of service or storage space may be felt by those using the units, but I consider that the provision of the service and storage spaces for each residential unit, in addition to the alternative and

communal service and storage spaces will meet the needs of future residents and any adverse effects are acceptable.

#### Alterations and additions to heritage item and setting

The proposal involves works within the pump house heritage item and the surrounding heritage setting, as described in the planning framework section above.

Under the City Plan, any alteration of a Group 4 building, place or object, or the erection of any additional building(s) on a site containing a Group 4 building, place or object shall be a controlled activity, with the exercise of the Council's discretion limited to matters concerning the heritage values of a protected building, place or object.

Under the proposed Christchurch Replacement District Plan, consent is required for a controlled activity as the proposal includes heritage upgrade works to the Matai Street East pump house. Council's control is limited to the matters set out in Clause 9.3.4.1 a to h.

Consent is also required for a restricted discretionary activity for two reasons: the proposal includes alteration of a heritage item; and alteration to a heritage setting with the addition of new buildings. Council's discretion is limited to the matters set out in Clauses 9.3.5.1 a to l and 9.3.5.2 a to h, and Clauses 9.3.5.1 a to l and 9.3.5.4 a to e.

The effects of the proposed works on the heritage item and within the heritage setting (a seismic upgrade, brickwork repointing, repair and repainting of windows and doors, the addition of a new timber floor, and a new single level building at the rear of the pump house to accommodate a kitchen and seating for café use) have been assessed by the Council's Heritage Advisor, Gareth Wright, whose comments should be read in conjunction with this report.

Mr Wright noted that the seismic upgrade would avoid altering the exterior envelope of the building and that the steel frames would not be at odds with the industrial nature of the building. As details have not been provided for the works on the heritage building, they have been addressed through the recommended conditions. The elevations of the building would be largely unchanged and there would be minimal penetrations required for services. Mr Wright considered that the new pavilion would contrast with the pump house and be only lightly joined to it. The existing rear doors would be retained in-situ.

Mr Wright concluded that:

*The conversion of the Matai Street Pumphouse to a café is an innovative example of adaptive reuse, securing the future of this under-utilized and neglected building. The manner in which the building is being converted is also exemplary. Heritage form, fabric and appearance are being maintained, upgraded and restored. The new pavilion addition strikes the right balance between contrast and compatibility, whilst being appropriately subordinate.*

I consider that the effects of the proposal on the heritage item and setting are acceptable.

#### Protected Trees

Any work defined by Clause 2.2.4 (b), (c) or (d) affecting a notable tree identified in Appendix 4, shall be a discretionary activity, with the exercise of the Council's discretion limited to the impact of the works on the tree. The work affecting the protected trees would be the construction a townhouse, the apartment building, and the decking attached to the café, and sealing, paving, or soil compaction within 10 metres of the base of two protected trees (the English Oak (*Quercus robur*) notable tree and the Pink Horse Chestnut (*Aesculus x carnea*) notable tree). The proposal also involves the removal of the *Fraxinus excelsior* (English Ash) notable tree, the *Betula pendula* (Silver Birch) notable tree, the *Magnolia grandiflora* (Southern Magnolia) notable tree, and the *Eucalyptus delegatensis* (Alpine Ash) notable tree.

The removal of four notable trees would reduce the amount of existing planting retained on the site. However more trees are proposed to be planted between the proposed buildings and the road boundaries, which would be in a more visible location in terms of the view of the site from the street.

Council Arborist, Mr John Thornton, considered that;

*in terms of the removal of the existing Notable trees on site i.e. that is the English Ash, Silver Birch, the Southern Magnolia and the Alpine Ash (technically missing though there is a Eucalyptus in that spot), I would expect that some reasonably large replacement trees be provided, as their*

*removal will be a significant loss of vegetation to the landscape. Also of note is the loss of one of the best Rimu trees I have seen in the city boundaries. This is both a very large example of an urban Rimu, which is also of very good form and health.*

*In particular the English Ash is a very large tree and currently has a trunk diameter of over 96 cm, is 17 m tall and 18.5 m in crown width. Although the trees have been rated as below the level to qualify for continued protection under the proposed District Plan, the criteria for inclusion is far more severe than the current assessment system uses, with which they were assessed in the 1990's. This does not mean they are not worth retaining, just that they are not at a Notable tree level according to the proposed new CTEM system of appraisal.*

*However, if new trees of a species that will grow into large enough trees to replace the ones lost are provided, this would mitigate to a reasonable extent the loss of the trees.*

*Therefore I recommend that the planting of four replacement trees ... at least 3 metres high at the time of planting for exotics, and 2 metres high for natives.*

*The replacement trees should be planted in a suitable location, preferably where they are most visible. The replacement trees are to be maintained in accordance with internationally recognised Arboricultural practice and should not be topped.*

Mr Thornton originally included a list of preferred species for the above mentioned four trees, but subsequent discussion with Mr Thornton established that a number of the species proposed for the site would be adequate.

The removal of four notable trees would reduce the amount of existing planting retained on the site. However more trees are proposed to be planted between the proposed buildings and the road boundaries, which would be in a more visible location in terms of the view of the site from the street. While Mr Thornton recommended that four of the replacement trees be 3m in height at the time of planting, I consider that a condition requiring the two trees labelled plan reference 19 on the Proposed Tree Plan (at page 93 of the consent document) to be 3m in height at the time of planting would mitigate the effects of the loss of mature trees on the site.

I consider that the removal of four notable trees and works within 10m of two retained notable trees are acceptable, based on the recommended conditions that would manage the works.

## Transport

There are two transport related non-compliances, which relate to trip generation from the café operation (greater than the permitted 32 trips per day) and staff cycle parking provision for the café (not undercover or secure as required). The transport effects of the whole development on the surrounding transport network have also been considered. Vehicle and cycle parking numbers, parking manoeuvring, increased use of the Matai Street East and Darvel Street vehicle accesses, effects on the major cycle way along Matai Street East have been assessed by a Transport Engineer from Novo Group Limited, Mr Nick Fuller, whose comments should be read in conjunction with this report.

Mr Fuller considered that more than the required number of cycle parks had been provided for the café and that the proposed provision would be acceptable. With regard to traffic generation at the vehicle accesses, Mr Fuller agreed with the ITA (provided with the application) that traffic generation at the Darvel Street access would be very low and that the access would operate satisfactorily. Changes at the Kilmarnock Street access was anticipated to be negligible.

Regarding the Matai Street East vehicle access, Mr Fuller considered that 'whilst we note that it is not ideal to increase the volume of traffic using this access and therefore crossing the Major Cycle Route, we consider that it can occur safely.' The cross-section of the Matai Street East access contains a footpath, planting strip, cycle way and then the road carriageway, with no parking permitted on the proposal's side of the street. A visibility splay would also be provided, so Mr Fuller was satisfied that visibility for pedestrians would be improved and that drivers leaving the site would be able to see cyclists. Mr Fuller also considered that vehicles entering the site would need to give way and that the possible delay for them would not create adverse traffic effects for the road network. The possibility of each townhouse having their own access to Matai Street East was considered as creating worse effects than the proposal.

Regarding the trip generation associated with the café operation, Mr Fuller considered the transport effects of the café operation would be less than minor.

Mr Fuller concluded that he was satisfied that the transport effects of the proposed development on the safety and efficiency of the surrounding transport network would be less than minor. Accordingly, he could support the proposal from a traffic perspective.

I have relied on the advice of Mr Fuller and accept his advice. I consider that the transport effects of the proposal are acceptable.

### Café operation

At least one person engaged in the activity shall reside permanently on the site, and the maximum total number of hours the site shall be open to visitors, clients or deliveries for any activity other than a residential activity shall be 50 hours per week. Consent is sought for not having someone engaged in the café activity residing on the site, and for 75 hours of operation per week. Adverse effects of the café are on the residential coherence and character of the area.

While discretion is not restricted, the assessment matters under Clauses 15.2.25 and 15.2.27 provide some guidance and include the extent the surrounding area will be dominated by residential activity, the presence of residential neighbours for residential sites, any cumulative effects of loss of residential activity in the area, traffic and pedestrian movements that are out of character with the area, inconsistent noise, disturbance and loss of privacy, and mitigating aspects of the activity.

The immediately surrounding area contains CGHS, the existing hotels on the site and across Kilmarnock Street, and Hagley Park, so the area is already dominated by other activities. The café component is a part of the whole proposed development which will introduce more residential activity to the proposal site than currently exists. These proposed residential neighbours would have neighbours in the townhouses or apartment building, and would mitigate the residential incoherence of the café.

There is already pedestrian traffic along Matai Street East, being a quiet route to Hagley Park and Christchurch Girls High School. The existing major cycle way travels along the front of the proposed café site, and would already be anticipated to encourage cycle traffic along this road frontage. The proximity of the proposed café near a large open space in Hagley Park also makes the presence of a café compatible in terms of people frequenting the area.

I consider that the effects of the café operation on residential coherence are acceptable.

### Urban design

The proposal would result in 54 residential units, making it a restricted discretionary activity, to be assessed against the urban design matters listed in Clause 15.2.8. The council's discretion is not limited, but the assessment matters listed in Clause 15.2.8 provide some guidance to establish whether the proposal achieves a good outcome in terms of urban design principles. For completeness, I have summarised the advice from Council's Principal Adviser Urban Design, Hugh Nicholson, whose comments should be read in conjunction with this report.

Mr Nicholson made a number of points about the visual effects of the scale of the proposed buildings on the site and context. The proposed townhouses were considered to be of an appropriate scale for Matai Street East, and the residential components appropriately address the street. In particular, the ground floor living areas of the proposed apartments would provide for some interaction with the street, and the articulation of the proposed buildings would provide visual interest and human scale.

Mr Nicholson concluded that:

*In general this is a high quality proposal which will provide an attractive medium density living environment adjacent to Hagley Park and the existing Chateau on the Park hotel. The residential terrace housing and apartments are well-designed and the extra height in the proposed apartment building overlooking the park is appropriate reinforcing the corner and providing a high quality living environment with views over Hagley Park.*

I have relied on the advice of Mr Nicholson and accept his advice that the proposal is of high quality and takes into account the relevant urban design principles.



Both the townhouses and the apartment building present a large amount of solid built form to the street, but for the reasons discussed above I agree that the development is appropriate for the context, and the units at ground level would connect with the street frontage. The articulated form of the townhouses and apartment building avoid a monotonous structure on the street front, and parking and garages have been mostly kept away from the surrounding streets. Trees have been retained and while some are being removed there are more proposed to be planted, many between the buildings and the road boundaries.

I only consider the height of the apartment building's ground floor to present an adverse visual effect to the street frontages, but this is mitigated by planting and direct accesses to courtyards which creates a more human scale at ground level. I consider that CGHS and the performing arts centre, and users of the north west corner of Hagley Park may notice the apartment building's ground floor design, but only for short durations. I therefore consider this adverse effect to be acceptable.

### Positive effects of the proposal

Positive effects of the proposal may be considered under section 104(1). I consider that these are:

- introducing permanent residential activity into the application site
- re-using and restoring a heritage item
- creating a strong built edge along Matai Street and around the corner of Deans Avenue
- providing passive surveillance to Hagley Park and a section of Matai Street East
- locating residential units near a major cycle route.

It is my opinion that while the proposal would establish higher density residential units and a non-residential activity (a café) in an area with predominantly single or two-storey dwellings, the proposal would have the positive effect of establishing more residential activity in a location dominated by a high school and a hotel operation. The housing is of a different nature to the existing housing nearby, but I consider it has been designed in a way that is sympathetic to this existing housing stock, specifically by graduating the density from higher at the Park to lower adjacent to the established residential area.

The proposal creates a number of active frontages along Deans Avenue and Matai Street with outdoor and indoor living spaces facing the street, and pedestrian access from the street for the townhouses and some of the ground floor apartment units. In establishing more residential use the proposal would also provide for more passive surveillance over Matai Street East, Deans Avenue and a densely planted part of Hagley Park. Mr Nicholson, in his urban design advice, also considered that 'Hagley Park would benefit from increased levels of surveillance provided by additional residential units overlooking the park'.

Mr Nicholson also considered that a positive effect of the proposal would be to create a;

*'Strong built edge along Matai Street and around the corner onto Deans Avenue. The proposed apartments would overlook Hagley Park and provide an attractive edge to Deans Avenue. The additional height emphasizes the corner. In my opinion the development responds to the corner site positively and would create a legible street corner.'*

The proposal would locate more dwellings near to a major cycle route, a pleasant pedestrian route and existing public transport routes that ideally will encourage people to adopt more active modes of transport.

The application site includes the site of the heritage item pump building, and has incorporated the restoration and seismic strengthening of this building into the proposal. Re-use and repair of a heritage item is a positive effect of the proposal as it will retain the building's existing heritage values and contribute to the character of the area.

### Conclusion

Due to the nature of nearby neighbours and buildings, the separation provided between the proposed apartment building and the nearest existing residential dwellings, and the balancing and mitigating effect of Hagley Park and the existing and proposed trees, I consider that the adverse effects of the proposal are acceptable. There are also a number of positive effects that the proposal will have on the site and the surrounding area, which will mitigate these minor adverse effects.

In my view, the proposal would be an appropriate use of the site.

## **Recovery Plans and Regeneration Plans**

Section 60(5) of the Greater Christchurch Regeneration Act 2016 states that Recovery Plans and Regeneration Plans are a matter over which discretion is restricted.

I consider that the proposal is not inconsistent with the Christchurch Central Recovery Plan, which seeks to enable residential activity within the Central City, as the proposal is likely to support recovery of the Central City despite not being located within the four avenues.

There are no Regeneration Plans relevant to this application.

<b>Relevant objectives, policies, rules and other provisions of the Plan and proposed Plan [Section 104(1)(b)(vi)]</b>
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Regard must be had to the relevant objectives and policies in the Operative City Plan, and those in the Proposed Replacement District Plan. Of particular note, Chapter 3 of the Operative Replacement District Plan contains a number of high level strategic objectives to guide the recovery and future development of the City. Chapter 14 contains objectives and policies for high quality residential environments, Chapter 7 contains objectives and policies for the transport system, and Chapter 9 contains objectives and policies for maintaining historic heritage.

Objective 3.3.1 seeks to enable recovery and facilitate the future enhancement of the district in a manner that meets the community's needs for housing, infrastructure and transport. I consider that the proposal is consistent with this objective.

### *Heritage*

Under the operative City Plan, *Policy 4.3.1 – Heritage Items* aims to identify and provide for the protection of heritage items having regard to their significance. Under the proposed Christchurch Replacement District Plan, *Policy 9.3.2.7 - Ongoing, Viable Use of Heritage Items and Heritage Settings* seeks to provide for the ongoing, viable use including adaptive reuse of heritage items and heritage settings, including recognising and providing for works necessary as a result of damage incurred from the Canterbury earthquakes of 2010 and 2011. The proposal would reuse and seismically strengthen the heritage pump house, and the works on the heritage item would be managed by the proposed conditions of this resource consent. In my view, the proposal is consistent with the heritage objectives and policies in both Plans.

### *Trees*

Under the operative City Plan, *Policy 4.3.7 – Protected trees* aims to identify and provide for the protection of trees having special value to the community.

*Policy 9.4.2.3 - Trees in Road Corridors, Parks, Reserves, and Public Open Space* seeks to ensure that road corridors, parks, reserves, and public open space are planted with trees to enhance environmental, landscape, cultural, social and economic values. *Policy 9.4.2.4 – Felling of significant trees* endeavours to avoid the felling of significant trees identified as having exceptional values and limit the felling of other significant trees identified as not having exceptional values.

Under the proposed Christchurch Replacement District Plan *Objective 9.4.1 – Trees* aims to maintain and enhance the contribution of significant trees and trees in road corridors, parks, reserves and public open space.

Four trees listed as notable under the City Plan are proposed to be removed. Under the proposed Christchurch Replacement District Plan, none of these trees are retained as notable. As the four trees to be removed have not been retained as notable under the proposed District Plan, I consider that the felling of these trees is not inconsistent with the proposed policies and objectives. The two notable trees under the City Plan that the proposal will retain are located near to Matai Street East and Deans Avenue, which is consistent with Policy 9.4.2.3 for trees in road corridors. While the proposal will remove some trees adjacent to the road corridor, the applicant will plant replacement trees to work with the proposed townhouses and apartment building.

### *Transport*

Under the operative City Plan *Policy 7.1.1* seeks to remedy, mitigate or avoid the adverse effects of the use of the transport system, and *Policy 7.1.4* aims to make efficient use of the transport system, particularly its infrastructure. Under the proposed Christchurch Replacement District Plan, *Policy 7.1.1.6* aims to promote public

and active transport, and *Policy 7.1.1.2* seeks to manage the adverse effects of high trip generating activities on the transport system by assessing their location and design.

The transport advice received for this proposal was that any effects of the proposal on the transport system would be less than minor, which I accept. I therefore consider that the proposal is consistent with the objective and its policies. I also consider that the proposal places more residential units close to the central city, existing bus routes, pedestrian routes and a major cycle way, which would make efficient use of existing public transport systems.

### *Residential*

Under the operative City Plan, urban growth objectives and policies include *Objective 6.1 – Urban consolidation* - to accommodate urban growth with a primary emphasis on consolidation, and *Policy 6.1.2 – Redevelopment and infill* - to promote redevelopment and more intensive use of the urban area in a manner that maintains and improves neighbourhood character and amenity values and the quality of the built environment, while being sensitive to the receiving environment and avoiding and mitigating adverse effects. The proposal would redevelop an area of land close to the city centre and support urban consolidation, with anticipated positive effects for cost effective services, energy efficiency and reduced or shorter private car-borne trips by locating housing close to employment, schools and business areas. I consider that the proposal is compatible with and sensitive to its receiving environment.

Under the operative City Plan, living environment objectives and policies are for diverse living environments (*Objective 11.1*), providing various densities accounting for existing residential characters (*Policy 11.1.4*), locating higher rise buildings adjacent to Hagley Park (*Policy 11.1.5*), and ensuring open space reflects local character (*Policy 11.4.1*). I consider the proposal is consistent with these objectives, by locating the apartment building near to Hagley park, providing a range of living densities, and providing a range of on-site open space areas consistent with expectations for a townhouse, ground floor apartment unit, and above ground apartment unit.

Under the proposed Christchurch Replacement District Plan, a strategic objective (3.3.4) is to enable an additional 23,700 dwellings through a combination of residential intensification, brownfield and greenfield development, and for a range of housing opportunities to meet diverse and changing needs of Christchurch residents. I consider the proposal to be consistent with this objective as it will produce 54 new residential units over less than a hectare of land, and will locate them near the Central City.

### *Non-residential activity*

Under the operative City Plan, living environment *Policy 11.4.12 – Scale* is to ensure that the scale of non-residential buildings and activities is compatible with the scale of those of the surrounding living environment. I consider that the scale of the café is compatible with the existing surroundings of the proposal site, and that the proposal is consistent with this policy.

Note: Strategic Objective 3.3.2 of the Christchurch Replacement District Plan states that requirements for notification and written approval are to be minimised when implementing the Plan. Regard was had to this objective at the time the decision on notification was made.

Overall, I consider the application to be consistent with the relevant objectives and policies in the operative and proposed plans, as it will:

- reuse and retain heritage fabric in the pump house;
- retain notable trees in the road corridor;
- not adversely affect the transport system and will provide residential units near to public and active transport infrastructure;
- consolidate residential units in an existing urban area near the central city in manner that is not incompatible with the receiving environment; and
- will create a high quality residential environment (in particular I consider that the café operation would be not be of an incompatible scale for the proposal site and its surroundings).

<b>Weighting of the City Plan and Christchurch Replacement District Plans</b>
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The Strategic Directions and Strategic Outcomes chapter of the Replacement District Plan became operative on 25 May 2015, therefore the strategic objectives must be given significant weight.

The rules within the notified Chapter 9 Natural and Cultural Heritage of the proposed Christchurch Replacement District Plan have immediate legal effect under section 86B(3)(d), and should be given some weight along with the operative rules for protected buildings, places and objects and protected trees.

Decision 7 – Transport (Part) on the proposed Christchurch Replacement District Plan is operative as of 18 December 2015, so must be given full weight.

**Relevant provisions of a National Environmental Standard, National Policy Statement, Regional Plan, Regional Policy Statement or Coastal Policy Statement [Section 104(1)(b)]**

Environment Canterbury and Council records indicate that the application site has not been used for an activity on the Hazardous Activities and Industries List (Ministry for the Environment) therefore the National Environmental Standard for managing contaminants in soil to protect human health does not apply.

**Any other matters which are relevant and reasonably necessary to determine the application [Section 104(1)(c)]**

**Precedent / Plan Integrity**

Given the non-complying status of this application it is appropriate to have regard to the issue of precedent, as well as the effect of granting consent upon the integrity of the City Plan and public confidence in its consistent administration. Case Law has established however, through the High Court in *Rodney District Council v Gould*, that concerns relating to plan integrity and precedent effect are not mandatory considerations. The Court held that they are matters that decision makers *may have regard to*, depending on the facts of a particular case including:

1. Whether a proposal is contrary to the objectives and policies of the plan; and if so
2. Whether in the circumstances of a particular case a proposal can be seen as having some unusual quality.

In this case the proposal is not contrary to the objectives and policies, therefore I am satisfied that issues of precedent or plan integrity do not arise.

In my opinion the proposal and the application site have a number of unique characteristics which would distinguish it from other applications for over-height activities in a living zone. These include:

- the location of the proposal site near non-residential activities (a high school and a hotel)
- the use of the whole site bound by Darvel Street, Matai Street East and Deans Avenue for a single development with three components
- the location of the site adjacent to Hagley Park

Given these factors, I consider that granting consent to this application is unlikely to give rise to any significant precedent effect which would challenge the integrity of the City Plan.

**Part II of the Resource Management Act 1991 [Section 104(1)]**

The above considerations are subject to Part II of the Act which outlines its purpose and principles.

The proposal is considered to be consistent with Part II matters as it will maintain the amenity of the surrounding environment, in accordance with Section 7(c) and 7(f), it will be an efficient use of land (providing residential units and a café in space occupied by gardens near the central city and transport links), in accordance with Section 7(b), and it will protect historic heritage from inappropriate use and development, in accordance with Section 6(f) of the Resource Management Act 1991.

**Non complying activity threshold tests [Section 104D(1)]**

The application satisfies both tests as the adverse effects on the environment will be no more than minor and the application is not contrary to the objectives and policies of the Plan.

#### Section 104(3)(d) notification consideration

No matters have arisen in the assessment of this application which would indicate that the application ought to have been notified.

**Recommendation:** That for the above reasons the application **be granted** pursuant to Sections 104, 104B, 104D and 108 of the Resource Management Act 1991, subject to the following conditions:

1. The development shall proceed in accordance with the information and plans submitted with the application, including the further information and amended plans submitted on 5/08/2016, except as amended by the subsequent conditions. The Approved Consent Documentation has been entered into Council records as RMA/2016/1434 (160 pages) and includes the stamped approved plans RMA/2016/1434 pages 46 to 104.

#### Notable trees

2. The applicant shall appoint a suitably experienced and qualified Arborist that is approved by the City Arborist, Christchurch City Council, to monitor and supervise all works within 10 metres of the protected trees (labelled numbers 23 and 51 on sheet 7 of the Landscape plan, or page 91 of the consent document) for the duration of proposed works. This person is to be engaged by the applicant and is to liaise with the project manager, supervisory staff and the contractors carrying out the works on site to ensure that tree protection occurs for the duration of the works (see advice note 1).
3. The arborist appointed under condition 2 above shall attend a pre-commencement meeting, where the arborist will outline tree protection requirements to the contractors carrying out the proposed works.
4. Soil excavation within 10 metres of the protected trees (23 and 51 on sheet 7 of the Landscape plan) shall occur under the direction and supervision of the appointed Arborist.
5. Hand-digging shall be used under the supervision and direction of the appointed Arborist when excavating soil within the 10 metre setback areas when determining the location of significant roots for foundations, or other locations specified by the appointed Arborist.
6. The laying of any services within the 10 metre setback of the protected trees shall, where practicable, use a boring/thrusting technique at a minimum depth of 600 mm below ground level. If not practicable, it shall be carried out in accordance with condition 5.
7. A 1.8m high fence with wire mesh panels shall be erected around the protected trees (23 and 51 on sheet 7 of the Landscape plan) on the site that may be affected by the construction activities, to exclude the tree root protection zone from site activity.
8. The fence required under condition 7 above shall be well braced to resist impacts, and shall be put in place prior to commencement of site work under the supervision of the Arborist appointed under condition 2, and remain in place until all site work has been completed.
9. There should be no alteration to the barrier fencing or access to the tree root protection zone without prior approval by the Project Manager, stating the purpose and duration of the proposed access, unless the Project Manager is on site and attending in person.
10. When soil is cleared around any tree roots they must not be left exposed for an extended time, and they shall be protected from desiccation and damage by the use of damp Hessian or good quality topsoil, as specified by the appointed Arborist.
11. If any roots encountered at the levels to be excavated have to be severed, they shall be severed cleanly with pruning secateurs or a hand saw, and no ripping or breaking of roots is to occur. All root pruning is to be carried out by the appointed Arborist.
12. Any heavy machinery used on site shall avoid coming within 8 metres of the base of the tree, except where the surface is already sealed.
13. No materials or machinery/vehicles are to be stored/parked within 10 metres of the base of the tree during the construction work, including excavated soil, chemicals or building materials.



14. Disposing of water used to wash down machinery (e.g. concrete mixers) within 10m of the protected trees (labelled numbers 23 and 51 on sheet 7 of the Landscape plan) is prohibited.
15. The appointed Arborist shall advise the City Arborist in writing, within twenty-four hours of any damage to the protected trees (23 and 51 on sheet 7 of the Landscape plan) resulting from the works, which in the opinion of the appointed Arborist is likely to result in more than minor adverse effects on the tree. If damage is caused to the protected trees as a result of the works, then the resource consent holder shall be responsible for rectifying the damage to the best possible extent. In the event of damage to the protected trees, the appointed arborist shall prepare a report detailing what damage occurred, how it will be rectified and how further damage would be prevented. The report shall then be submitted to the council arborist for approval.

### **Landscaping**

16. The proposed landscaping shall be established in accordance with the Proposed Tree Plan at page 93 of 160 of the consent document, with the exception of the two *Quercus rubra* (plan reference 19 on the Proposed Tree Plan) to be 3m in height at time of planting (all other trees to be 2m in height at time of planting)
17. All required landscaping shall be provided on site within the first planting season (April to October) after the date of issue of the code of compliance certificate under the Building Act. For avoidance of doubt, if the development is staged then this condition shall apply to each stage of the development.
18. All landscaping required for this consent shall be maintained. Any dead, diseased, or damaged landscaping is to be replaced immediately with plants of a similar species.

### **Parking and transport**

19. 3 vehicle parking spaces to the south of the apartment building shall be allocated for apartment use.
20. If the proposed café is to operate under hours of darkness, lighting of parking and loading areas shall be maintained at a minimum level of two lux, with high uniformity, during the hours of operation. Lighting shall still comply with relevant District Plan standards for controlling glare.
21. A visibility splay in accordance with Appendix 7.9 of Chapter 7 of the replacement Christchurch District Plan (as at 23/8/2016) shall be maintained on the west side of the Matai Street East vehicle crossing, and the south side of the Darvel Street vehicle crossing. Any landscaping within the visibility splay shall be kept below 0.5m in height.

### **Acoustic insulation**

22. Any new habitable space within the proposed apartment building which is within 40 metres of the edge of the nearest marked traffic lane of Deans Avenue, shall achieve a minimum external to internal noise reduction of 30 dBA (Dtr, 2m, nT).

### **Heritage**

23. The applicant must advise the CCC Heritage Team leader or nominee of the imminent commencement of works at least ten working days in advance so that it can be ensured that those conditions of consent that require prior agreement are verified.
24. The applicant shall not commence or shall cease work in a given area if there are any changes proposed to the submitted and approved plans in relation to that area. These changes must be discussed and agreed with the CCC Heritage Team Leader or nominee before work is commenced or further work undertaken. See advice note 7.
25. A photographic record of the works must be undertaken before commencement, at regular intervals during works and after completion. This record shall be provided to the CCC Heritage Team leader or nominee within one month of completion. This record shall be executed as per the matters outlined in the City Plan: vol. 3, s. 10, clause 1.3.5 – Photographic Records (Group 1 – 4 heritage items) - except that it is not required that the photographs be taken by a professional photographer. They must however be in a high quality, high resolution digital format. See advice note 5.
26. The applicant must provide a Temporary Protection Plan (TPP) to the CCC Heritage Team Leader or nominee for discussion and approval before the commencement of works on site. Once works are underway, the TPP should be reviewed on a weekly basis to ensure that any immediate risks to heritage fabric are highlighted and necessary mitigation measures undertaken.
27. Copies of the approved consent documentation and the TPP must be held on site at all times; form part of the site induction process; be read, signed and complied with by all tradespeople working on site; and be made available on request to Council employees or their representatives.

28. Heritage joinery must be left in-situ if possible, and original finishes and heritage patina maintained. If the removal of the joinery is required, then it shall be removed with care and marked to permit reinstatement in its original location. Reproduction joinery must only be employed where reinstatement of the original is not possible. Reproduction is to be undertaken on a 'like for like' basis in terms of materials and profile, and must be identified as new work by date stamping or other means of identification. See advice note 3.
29. The mortar mix to be employed for brickwork repair and repointing shall be provided to the CCC Heritage Team Leader or nominee for discussion and approval before the commencement of works on site.
30. The applicant shall provide full structural drawings for the seismic upgrade to the CCC Heritage Team Leader or nominee for discussion and approval before the commencement of works on site.
31. The applicant shall provide the structural detail for the new timber floor to the CCC Heritage Team Leader or nominee for discussion and approval before the commencement of works on site.
32. The applicant shall submit their selected portal frame paint colour to the CCC Heritage Team Leader or nominee for discussion and approval before this element of works commences.

#### **Advice Notes:**

#### **Trees**

1. The following local Arboricultural firms are considered acceptable to Christchurch City Council:

- a) Advanced Tree Services - 03 344 6162/ Mathew Palmer 027 2202724
- b) Arbor-Tek Ltd - 03 3497143 / Joe Berryman 027 272 6710
- c) City Care - 03 941 7200 Fax 03 941 7250
- d) Four Seasons Tree Care (Otautahi) Limited - 03 381 1422, Mobile: 021 029 66714, email [bek@fourseasonstrecare.co.nz](mailto:bek@fourseasonstrecare.co.nz)
- e) Treotech Specialist Treecare Ltd - 03 383 9370/ 0800 873378, Chris Walsh 027 2297499
- f) Arbor Vitae - Laurie Gordon (Tree Reports/Assessments only) 027 229 2536
- g) Warner Tree Care Limited (Tree Reports/Assessments only) 03 3394412, Liz Warner 0211206913 email [Liz@warnertreecare.co.nz](mailto:Liz@warnertreecare.co.nz)

#### **Heritage**

2. All works should be carried out with regard to the conservation principles contained within the ICOMOS New Zealand Charter for the Conservation of Places of Cultural Heritage Value (ICOMOS New Zealand Charter 2010).
3. The dating of new or introduced fabric may be undertaken by any permanent means including marker pen. Marking should be in unobtrusive locations. Not all new fabric requires dating; only where there is the potential for the future misinterpretation of replica fabric or introduced old fabric as original heritage fabric should it be marked.
4. All works to be undertaken on the repair and replacement of heritage fabric should be undertaken by tradespeople experienced in working with such fabric.
5. The purpose of this photographic record (see condition 25) is the recording of changes to the fabric of the heritage item as a consequence of the programme of works. The focus of the images should be the areas in question rather than individual elements.
6. The CCC Heritage Team nominee for this project is currently Gareth Wright [gareth.wright@ccc.govt.nz](mailto:gareth.wright@ccc.govt.nz) DD: 941 8026.
7. With reference to Condition 24; a further consent will be required for proposed changes which are considered by the CCC Resource Consent Unit to be beyond the scope of this consent.

#### **Monitoring**

8. The Council will require payment of its administrative charges in relation to monitoring, as authorised by the provisions of section 36 of the Resource Management Act 1991. The current monitoring charges are:
  - (i) A monitoring fee of \$298 to cover the cost of setting up a monitoring programme and carrying out two site inspections to ensure compliance with the conditions of this consent; and
  - (ii) Time charged at an hourly rate of \$116 incl. GST if additional monitoring is required, including non-compliance with conditions.

## Development Contribution Assessment

9. Development Contributions have been assessed in accordance with the Development Contributions Policy 2015, which has been established under the Local Government Act 2002. Full details of the policy are available at <http://www.ccc.govt.nz/consents-and-licences/development-contributions/>.

Payment of Development Contributions can be made at any time following the issue of this consent. Payment in full must be made before either commencement of the Resource Consent activity, issue of Code Compliance Certificate for a building consent, issue of section 224 Certificate for a subdivision consent, or authorisation of a service connection.

### Development Contribution Summary as at 17 June 2016:

DEVELOPMENT CONTRIBUTIONS SUMMARY				PIM or Building Consent Ref:		RMA/2016/1434		
Customer Name		Rexton Global Limited				ASSESSMENT		
Project Address		189 Deans Avenue						
Assessment Date		17/06/2016						
Assessment Summary								
Location: <b>Riccarton</b>		HUE Credits		Assessed HUE After Discount	Change	DC Rate (incl GST)	DC Charge (incl GST)	
		Current	Assessed					
<u>Activity</u>	<u>Catchment</u>	HUE A	HUE B	C	HUE D	HUE E	G	F= E x G
<b>Network Infrastructure</b>								
Water supply	District-wide	0.00	54.83	0%	54.83	54.83	\$2,785.59	\$152,719.83
Wastewater collection	District-wide	0.00	54.83	0%	54.83	54.83	\$6,582.60	\$360,891.05
Wastewater treatment and disposal	District-wide	0.00	54.83	0%	54.83	54.83	\$3,385.35	\$185,601.65
Stormwater & flood protection	Avon	0.00	6.26	0%	6.26	6.26	\$982.82	\$6,157.04
Road network	Inner City	0.00	59.51	0%	59.51	59.51	\$1,011.36	\$60,180.74
Active travel	District-wide	0.00	59.51	0%	59.51	59.51	\$375.35	\$22,335.11
Public transport	District-wide	0.00	59.51	0%	59.51	59.51	\$488.96	\$29,095.39
<b>Total Community and Network Infrastructure</b>								\$816,980.81
<b>Reserves</b>								
Regional parks	District-wide							\$154,090.13
Garden and heritage parks	District-wide							\$10,478.84
Sports parks	District-wide							\$143,595.82
Neighbourhood parks	Inner City							\$160,039.84
							15.00%	\$167,632.88
<b>Total Development Contribution</b>								<b>\$1,285,185.44</b>

### Reconsideration and/or objection

A request for reconsideration of development contributions or an objection to development contributions may be made if you have grounds to believe:

- the development contribution was incorrectly calculated or assessed under the territorial authority's development contributions policy; or
- the territorial authority incorrectly applied its development contributions policy; or
- the information used to assess the person's development against the development contributions policy, or the way the territorial authority has recorded or used it when requiring a development contribution, was incomplete or contained errors.

A Request for Reconsideration Form must be lodged with Council within 10 working days of receiving this notice. A Request for Reconsideration form can be found at [www.ccc.govt.nz](http://www.ccc.govt.nz).

An Objection to Development Contributions form must be lodged with Council within 15 working days of receiving this notice. An Objection to Development Contributions form can be found at [www.ccc.govt.nz](http://www.ccc.govt.nz).

### Notes:

- This assessment is valid for 24 months from the date of issue. Reassessment of this development contribution assessment will occur after 24 months only when an invoice is generated, and this original assessment (or subsequent reassessment) has expired.
- This assessment supersedes any estimate you may have received on a Project Information Memorandum (PIM) or Development Check.
- If you have any queries regarding the Development Contribution please contact our Development Contributions Assessors on ph. 03 941-8999.

**Reported and recommended by:** Shona Jowett, Planner

**Date:** 22 August 2016

**Peer reviewed by:** Ruth Markham-Short, Planner

**Date:** 22 August 2016

<b>Decision</b>
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That the above recommendation be adopted for the reasons outlined in the report.

**Delegated officer:**



Christofferson, Andy  
23/08/2016 2:13 PM  
Planning Team Leader





# Kauri Cluster Street Renewals

- Kauri Street (Riccarton Road to Rata Street)
- Rata Street (Kauri Street to Straven Road)
- Rimu Street (Riccarton Road to Titoki Street)

## A Christchurch City Council Consultation Newsletter—April 2007

The Christchurch City Council has initiated this project to renew the kerb and channel along Kauri Street, Rata Street and Rimu Street during the 2007/2008 and 2008/2009 financial years.

Kauri Street, Rata Street and Rimu Street are all classified as local residential roads within the Council's roading hierarchy, with a low to medium level of through traffic. Kauri Street and Rimu Street are linked to Riccarton Road at the southern end with threshold treatments and landscaping and then extend northward. Rata Street runs parallel to Riccarton Road.

The historical Riccarton House and Riccarton Bush are located near to the project area.

This cluster of streets is located in the Riccarton area, which falls within the jurisdiction of the Riccarton/Wigram Community Board.

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**Kauri Cluster - Kauri Street, Rata Street and Rimu Street**

*This newsletter was produced by the Capital Programme Group of the Christchurch City Council.*

*For further information please contact  
Kirsty Ferguson,  
Consultation Leader  
Ph (03) 941 8662 or  
Email  
[kirsten.ferguson@ccc.govt.nz](mailto:kirsten.ferguson@ccc.govt.nz)*

*A feedback form is provided as an insert in this newsletter. Please return it by freepost by Monday, 30 April 2007.*





## Objectives

The primary aim of this project is to renew the kerb and channel along both sides of Kauri Street, Rata Street and Rimu Street.

The primary objectives for the project are:

- To renew the kerb and dish channel with kerb and flat channel.
- To improve safety for pedestrians, cyclists and vehicles, where practicable.
- To ensure adequate drainage design.
- To upgrade lighting, if appropriate.
- To reflect the local road nature of the street.

The secondary objectives for the project are:

- To ensure the design meets the demand for on-street parking.
- To provide landscape enhancement, where possible.

## Previous Consultation

In January 2007, an update newsletter was distributed to residents and local stakeholders to advise them of the issues raised during previous consultation undertaken within Kauri Street and Rata Street (between Kauri Street and Rimu Street).

An initial survey was carried out with Kauri Street residents in October 2004, while another survey was undertaken with Kauri Street and part of Rata Street residents in May/June 2006.

The key issues raised related to:

- **Parking** - There is a mixed reaction from residents to the existing parking restrictions along Kauri and Rata Streets. The Riccarton/Wigram Community Board has resolved that existing parking restrictions in Rata Street, Rimu Street, Kauri Street and Titoki Street will continue (14 Feb 2006). Westfield Mall shoppers still park in these streets.
- **Speed Reduction** - The corner of Kauri Street and Rata Street needs to be changed to slow vehicles down. This route is used as a short cut by motorists wanting to avoid Riccarton Road.
- **Landscaping** - Residents have requested landscaping and street trees that complement Riccarton Bush.
- **Street lighting** - More street lighting has been requested to improve pedestrian safety.
- **Cycling / Pedestrian Route** - This cluster of streets is a short cut for pedestrians and cyclists travelling to and from Deans Bush and nearby schools, so linkages with paths and crossing points should be considered.



## Street Trees and Landscaping Features



*Kauri trees (Agathis) have a straight, smooth trunk, develop massive ascending limbs with age, and the peeling bark produces distinctive patterns. Its broad leathery leaves, with no midrib, are arranged in almost opposite pairs, and its cones are almost globular with tightly packed scales. The Agathis australis is famous as New Zealand's largest native tree, and is generally found in swampy lowland forests in the North Island. Its small leaves (35mm long) are closely crowded on the adult branches. It is slow growing, with dense conical or columnar form. The bark is dappled gray and brown with small thick scales detaching, and bluish cones in summer.*



*The rata tree (Metrosideros robusta) is also known as the Northern rata. It is a tall tree found in New Zealand's North Island and northern South Island. It is slow growing, beginning as an epiphyte, with thick leathery leaves. It has red bottlebrush-like flowers in summer, although it does take several years to flower. The Southern rata (Metrosideros umbellata) is a native of New Zealand from the high rainfall areas of the South Island's west coast. While it is similar to its northern counterpart, it is smaller and not an epiphyte. Its leathery leaves are more lance-shaped. It also has red flowers in summer, but is very slow growing and it may take decades for flowers to appear.*



*The rimu tree (Dacrydium cupressinum) is also known as the New Zealand red pine. It is a native of New Zealand and is a slow-growing evergreen tree, which bears tiny leaves on pendulous, bronzy green branchlets. This species resents transplanting, is drought tender, and produces only tiny nutlets.*

*A water feature is proposed in the landscaping area at the intersection of Rata Street and Straven Road, which may be similar to the spring-fed water feature at Jellie Park (shown below).*





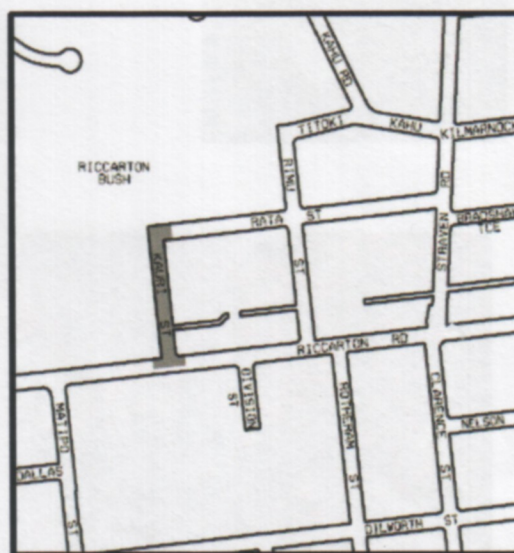
## Kauri Street

Kauri Street is 120 metres long, north of the existing build-out, with an existing carriageway width of approximately 13 metres. There is 60 minute parking restrictions and kerbside footpaths along both sides of the street. A service lane and threshold treatment is located on the eastern side of Kauri Street, approximately 40 metres north of the intersection with Riccarton Road. The road reserve is 20 metres wide. There are no overhead services along Kauri Street, except for the kerb-side street light poles. There are approximately 930 vehicles per day travelling along the street.

### The Concept Plan

The proposed plan for Kauri Street is shown below and includes the following key features:

- Full kerb and channel renewal. The existing kerb and dish channel will be replaced with kerb and flat channel for its entire length.
- The carriageway will be narrowed from the existing 13 metres to 10 metres with parking permitted along both sides.
- The existing parking restrictions will be maintained along the new carriageway.
- Parking bays will be marked on both kerbs with a through carriageway width of 6 metres.
- There will be no change to the location or design of the existing threshold treatments both at the intersection with Riccarton Road and north of the intersection of Riccarton Road.
- Wider grass berms (between 1.9 metres and 2.6 metres wide) will be located between the parking areas and the footpaths.
- Footpaths will be 1.65 metres wide with a 1.1-metre grass service strip adjacent to the property boundaries.
- Kauri trees are proposed to be planted in the grass berm at 15-20-metre intervals, with low level landscaping at the intersection of Kauri Street and Rata Street.
- The carriageway around the intersection of Kauri Street and Rata Street is narrowed to 7 metres to slow vehicle speeds around the bend.
- No stopping restrictions will be introduced around this corner.

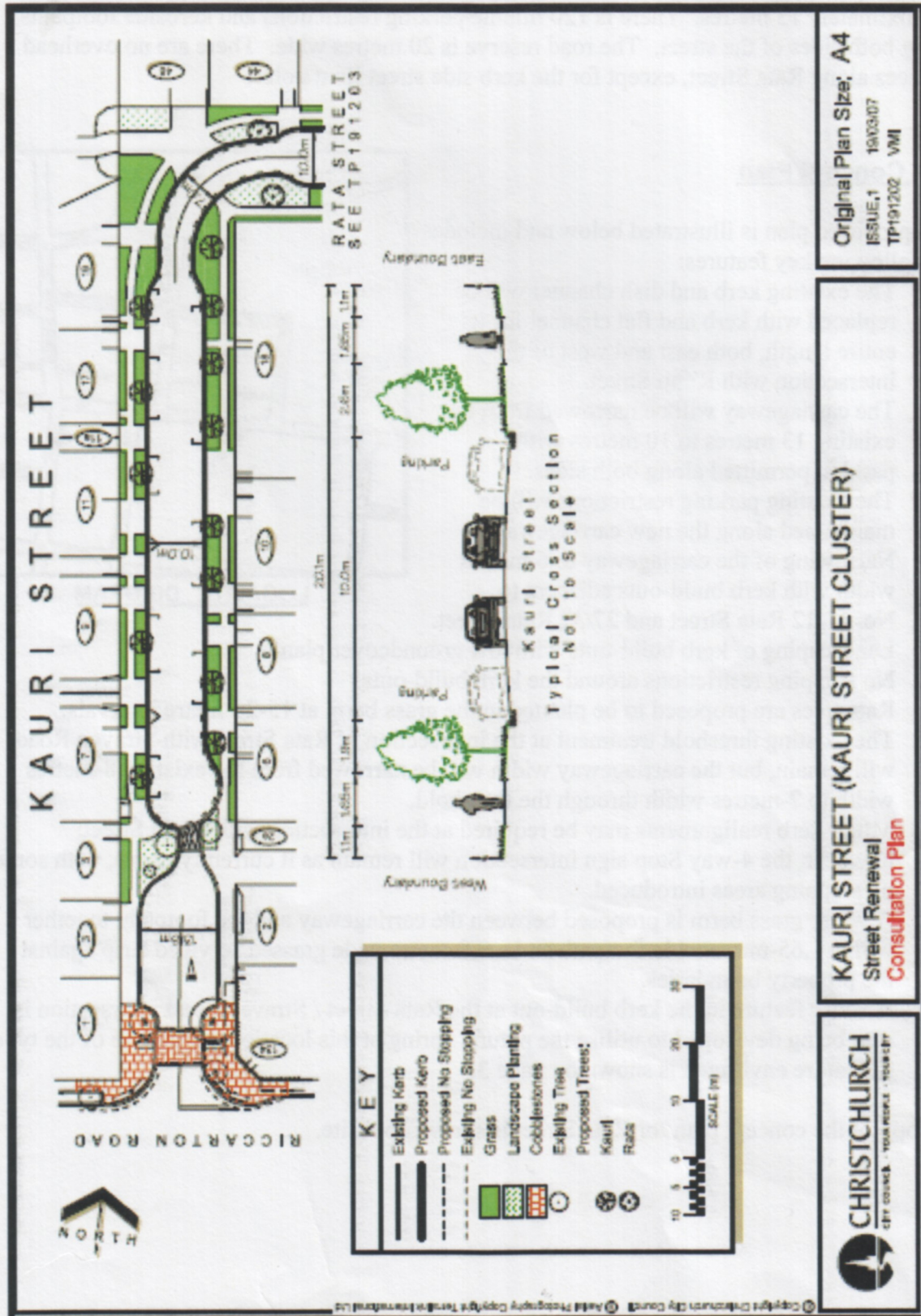


LOCALITY DIAGRAM

A copy of the concept plan for Kauri Street is shown opposite.



# Kauri Street - Concept Plan





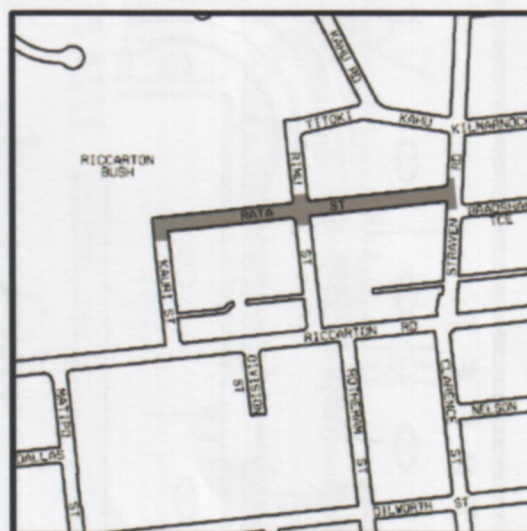
## Rata Street

Rata Street is approximately 400 metres long, with an existing carriageway width of approximately 13 metres. There is 120 minute parking restrictions and kerbside footpaths along both sides of the street. The road reserve is 20 metres wide. There are no overhead services along Rata Street, except for the kerb side street light poles.

### The Concept Plan

The proposed plan is illustrated below and includes the following key features:

- The existing kerb and dish channel will be replaced with kerb and flat channel for its entire length, both east and west of the intersection with Rimu Street.
- The carriageway will be narrowed from the existing 13 metres to 10 metres with parking permitted along both sides.
- The existing parking restrictions will be maintained along the new carriageway.
- Narrowing of the carriageway to 6 metres width with kerb build-outs adjacent to No. 11/12 Rata Street and 27/32 Rata Street.
- Landscaping of kerb build-outs with low groundcover plants.
- No stopping restrictions around the kerb build-outs.
- Rata trees are proposed to be planted in the grass berm at 15-20-metre intervals.
- The existing threshold treatment at the intersection of Rata Street with Straven Road will remain, but the carriageway width will be narrowed from the existing 8-metres width to 7-metres width through the threshold.
- Minor kerb realignments may be required at the intersection with Rimu Street; however, the 4-way Stop sign intersection will remain as it currently exists, with some no stopping areas introduced.
- A wider grass berm is proposed between the carriageway and the footpath, together with a 1.65-metre wide footpath and a 0.8-metre wide grassed serviced strip against the property boundaries.
- A water feature in the kerb build-out at the Rata Street / Straven Road intersection is also being developed to utilise the natural spring at this location. A picture of the type of feature envisaged is shown on page 3.

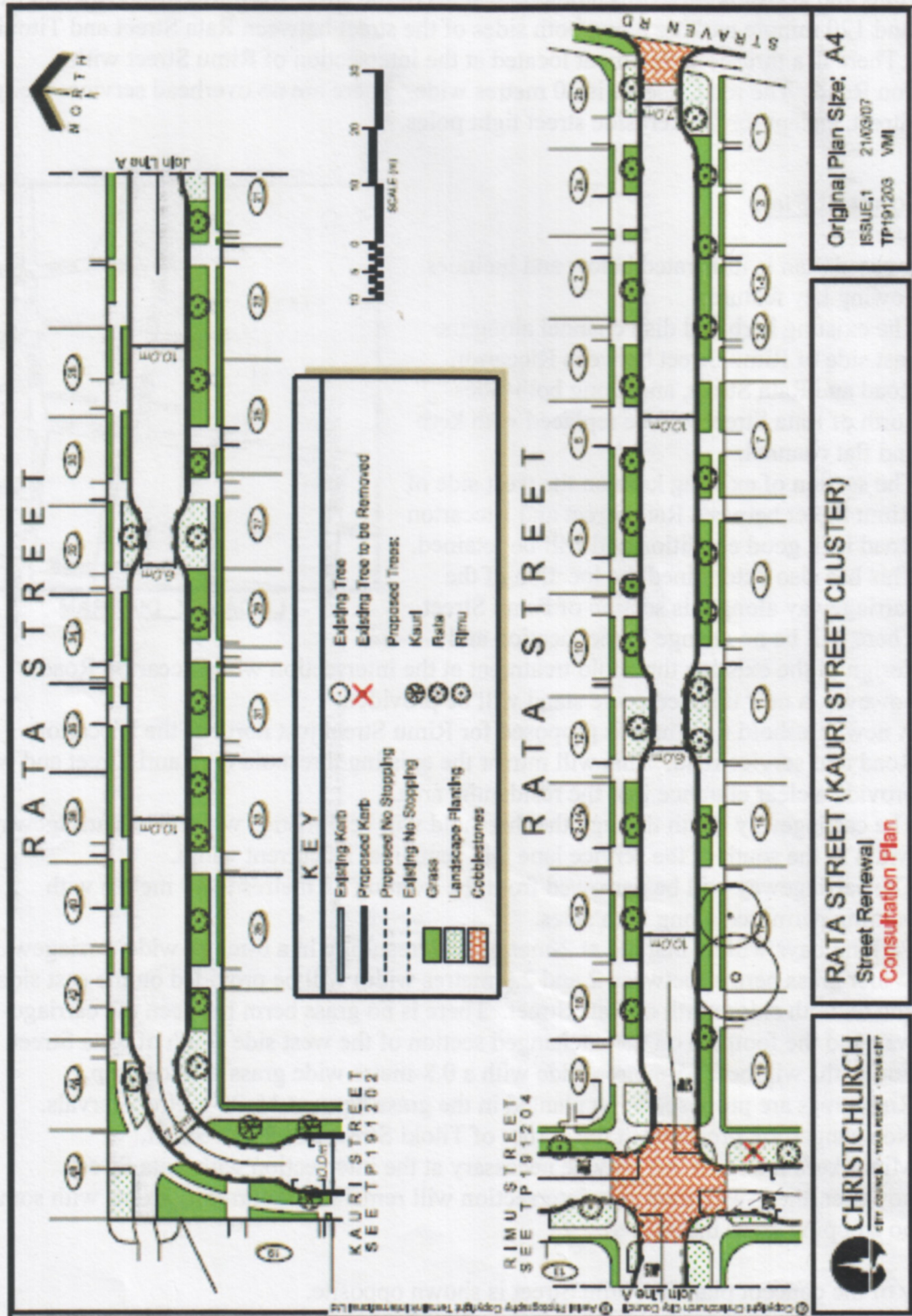


LOCALITY DIAGRAM

A copy of the concept plan for Rata Street is shown opposite.



# Rata Street - Concept Plan





**Rimu Street**

Rimu Street is approximately 270 metres long from Riccarton Road to Titoki Street, with an existing carriageway width of approximately 13 metres. There is 60 minute parking restrictions and kerbside footpaths along both sides of the street from Riccarton Road to Rata Street and 120 minute parking along both sides of the street between Rata Street and Titoki Street. There is a threshold treatment located at the intersection of Rimu Street with Riccarton Road. The road reserve is 20 metres wide. There are no overhead services along Rimu Street, except for the kerbside street light poles.

## The Concept Plan

The proposed plan is illustrated below and includes the following key features:

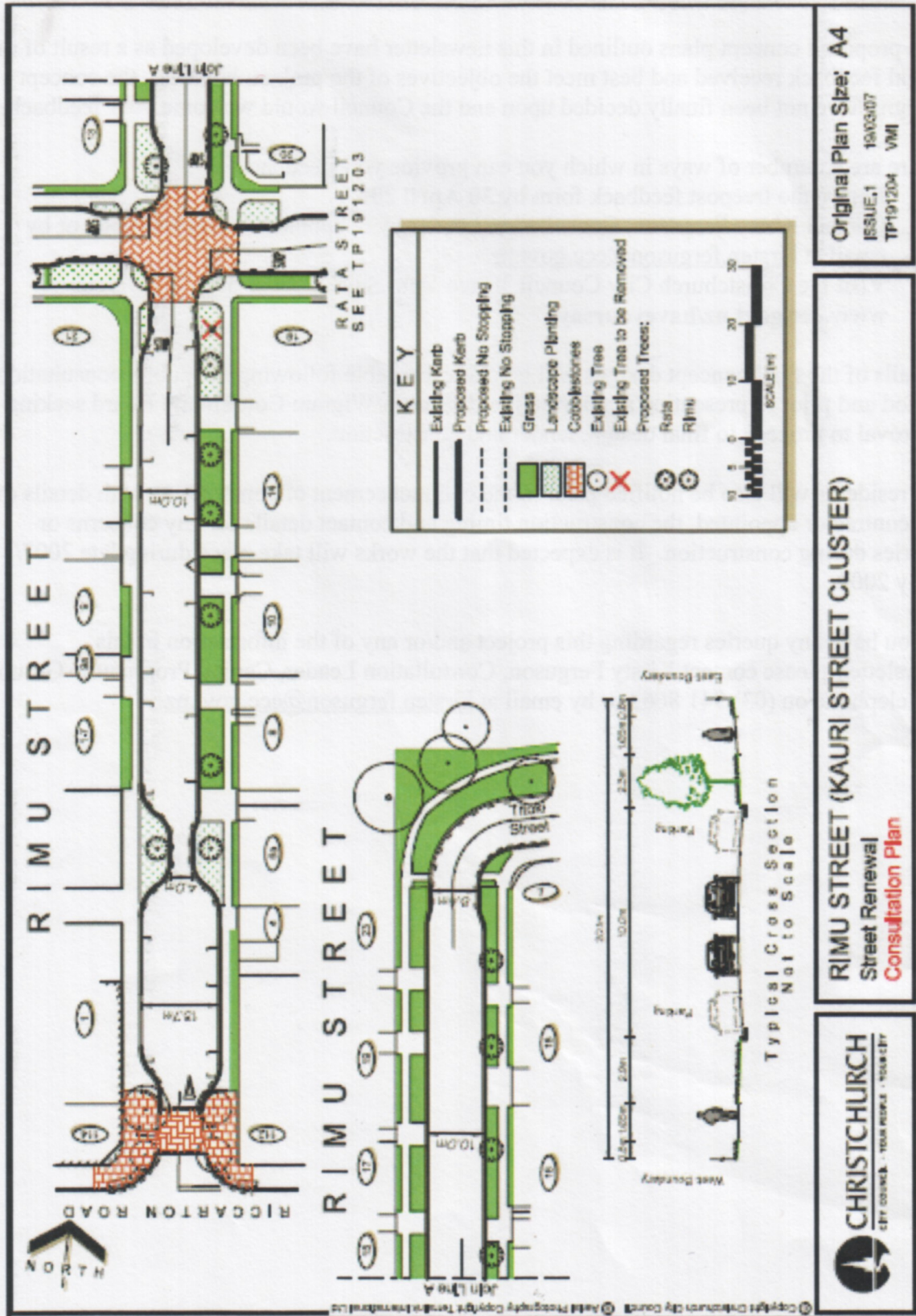
- The existing kerb and dish channel along the east side of Rimu Street between Riccarton Road and Rata Street, and along both sides north of Rata Street will be replaced with kerb and flat channel.
- The section of existing kerb on the west side of Rimu Street between Rata Street and Riccarton Road is in good condition and will be retained. This has also determined the location of the carriageway along this section of Rimu Street.
- There will be no change to the location and design of the existing threshold treatment at the intersection with Riccarton Road; however, a new updated cycle stand will be provided.
- A new threshold treatment is proposed for Rimu Street just north of the Riccarton Road rear service road. This will mirror the existing threshold on Kauri Street and will provide a clear entrance into the residential area.
- The carriageway width through the threshold will be 4 metres wide. The carriageway width to the south of the service lane will remain at its current width.
- The carriageway will be narrowed from the existing 13 metres to 10 metres with parking permitted along both sides.
- Parking bays will be marked at 2-metres with resulting in a 6-metre wide carriageway.
- Wider grass berms (between 2 and 2.9 metres wide) will be provided on the east side and on both sides north of Rata Street. There is no grass berm between the carriageway and the footpath on the unchanged section of the west side south of Rata Street.
- Footpaths will be 1.65 metres wide with a 0.8-metre wide grass service strip.
- Rimu trees are proposed to be planted in the grass berm at 15-20-metre intervals.
- No changes are proposed at the corner of Titoki Street and Rimu Street.
- Minor kerb realignments may be necessary at the intersection with Rata Street; however, the 4-way Stop sign intersection will remain as it currently exists with some no stopping areas introduced.



A copy of the concept plan for Rimu Street is shown opposite.



# Rimu Street - Concept Plan





## Consultation Process

The proposed concept plans outlined in this newsletter have been developed as a result of the initial feedback received and best meet the objectives of the project; however, the concept designs have not been finally decided upon and the Council would welcome your feedback.

There are a number of ways in which you can provide your feedback:

- Return the freepost feedback form by **30 April 2007**.
- Contact Kirsty Ferguson, Consultation Leader by telephone on (03) 941 8662 or by email at [kirsten.ferguson@ccc.govt.nz](mailto:kirsten.ferguson@ccc.govt.nz)
- Visit the Christchurch City Council "Have Your Say" website at [www.ccc.govt.nz/haveyoursay](http://www.ccc.govt.nz/haveyoursay)

Details of the final concept designs will be made available following the public consultation period and prior to presenting a report to the Riccarton/Wigram Community Board seeking approval to proceed to final design, tender and construction.

All residents will also be notified prior to the commencement of construction with details of the contractor appointed, the construction timing and contact details for any concerns or queries during construction. It is expected that the works will take place during late 2007/early 2008.

If you have any queries regarding this project and/or any of the information in this newsletter, please contact Kirsty Ferguson, Consultation Leader, Capital Programme Group by telephone on (03) 941 8662 or by email at [kirsten.ferguson@ccc.govt.nz](mailto:kirsten.ferguson@ccc.govt.nz)



## 5 Heritage Review and Recommendations

This section reviews Christchurch City Council's interface proposal (Figure 4) and provides visualisations of existing, medium (12m) and high density (20m) zoning. Additional sites and measures are recommended to protect the heritage landscape values of Pūtaringamotu.

### 5.1 Heritage Landscape Values and Visual Effects

#### 5.1.1 Response to Council's Proposed Interface Sites

Pūtaringamotu is an Outstanding Natural Feature and site of national importance with significant heritage, ecological and cultural values. The tall podocarp trees are a defining and distinctive landmark element when seen close up or from a distance across the city skyline. What we see today relates to depictions in early paintings of the area and it is therefore essential to retain views of the Bush, ensuring new development does not dominate or obscure the skyline.

Council have initially proposed reducing the NPS-UD 20m intensification heights to 12m for the majority of properties adjacent to Pūtaringamotu (interface sites shown on Figure 4). However, as site visits and modelling indicate, at 12m and 20m throughout the current interface area, and allowing for a range of design options, the expanse of Riccarton Bush above the rooftops will still be significantly obstructed with building heights restricted to 12m (Figure 21).

Enabling a 12m height limit and the potential bulk of three units per site with no minimum allotment size for existing or proposed dwellings would result in a noticeable change to the views of Riccarton Bush with potential to obscure visibility of Pūtaringamotu from residents and passers-by on suburban streets to the south, west and northwest of Riccarton Bush, apart from properties that share a boundary with the bush.



Figure 20: **Rata Street** looking northwest towards Pūtaringamotu Riccarton Bush, with graphic overlay showing possible apartment configuration under the **existing CDP height limit (8m)**.





Figure 21: **Rata Street** looking northwest towards Pūtaringamotu Riccarton Bush, with graphic overlay showing possible apartment configuration under a proposal of **12m height limit** within the Riccarton Bush interface.



Figure 22: **Rata Street** looking northwest towards Pūtaringamotu Riccarton Bush, with graphic overlay showing **20m height limit** and possible apartment configuration under the **NPS-UD Built Form Standards**. Outcome may vary through High Density Residential Standard provisions.

2 October 2019

Ministry for the Environment  
PO Box 10362  
Wellington 6143  
New Zealand  
[npsurbandevelopment@mfe.govt.nz](mailto:npsurbandevelopment@mfe.govt.nz)

**Christchurch City Council submission on the *National Policy Statement on Urban Development***

Thank you for the opportunity to comment on the proposed National Policy Statement on Urban Development (NPS-UD).

The Council agrees with and supports the Government's focus on successful cities. However, we have a number of concerns with what is being proposed and the process being used to make these changes. The very tight timeframe for this consultation, combined with the fact that is taking place directly prior to the local body elections, is extremely disappointing to the Council.

Our feedback is attached to this letter and includes general comments and covers the draft objectives and policies and responses to the consultation questions. The Council's feedback particularly highlights issues around:

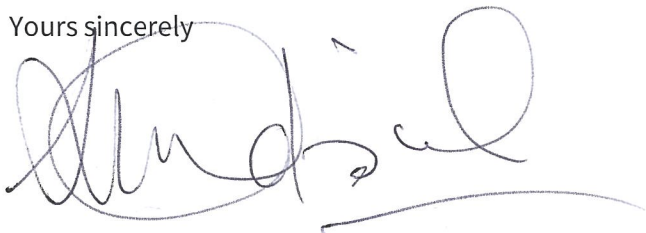
- the lack of a vision for urban NZ as a network of interconnected cities and towns;
- the need for much clearer direction on what constitutes a quality urban environment;
- the need to properly consider local priorities and context and thus lessen the directive nature of the proposed policies;
- the inconsistency of the proposed policies on greenfield development with the rest of the NPS-UD and with the draft NPS on Highly Productive Land;
- the lack of consideration of climate change imperatives; and
- the potential costs to local authorities.

These are all matters of significant concern to the Council.

The Council looks forward to working with the Government on making cities such as Christchurch even more successful. We thank you for the opportunity to provide this submission.

For any clarification on points within this submission please contact David Falconer, Team Leader – City Planning, at [david.falconer@ccc.govt.nz](mailto:david.falconer@ccc.govt.nz).

Yours sincerely



Hon Lianne Dalziel  
**Mayor of Christchurch**

TRIM: 19/1053274



## APPENDIX 1: Christchurch City Council submission on the *National Policy Statement on Urban Development* - key submission points

### Introduction

1. Whilst Council agrees with the Government's focus on successful cities, the Council has a number of concerns with what is being proposed and the process being used to make these changes. The main points we would like to discuss in this submission are:
  - Concerns about the **process and the timing** of the consultation – the reduced timeframes and consultation occurring directly prior to the local body elections.
  - A more **comprehensive vision of Aotearoa/New Zealand** as a network of interconnected cities and towns is required, with associated objectives and policies requiring infrastructure provision to support this.
  - Better direction is required on what constitutes a **quality urban environment**, because the proposed NPS-UD does not give clear direction on what this is.
  - The need to consider local priorities and the unique circumstances of each major urban centre, as **one solution will not work for all** – the proposed NPS-UD does not currently achieve this.
  - **Less directive policies are preferred** as there is a need to consider local priorities and context, which such an approach does not encourage.
  - The NPS-UD is likely to require **greater intensification** than what is enabled in Christchurch's recently-developed District Plan, without considering the lack of demonstrable need for this additional capacity, local priorities specific to Christchurch, and the potential impact on neighbourhood amenity.
  - **The policies around out-of-sequence greenfield development** are too directive, inappropriate for application on a national scale, and are not consistent with the National Policy Statement on Highly Productive Land nor the evidence-based, plan-led ethos of the rest of the NPS-UD.
  - The **costs for local authorities** of the extra requirements of the NPS-UD will need to be addressed through consideration of funding tools available to local government, and funding from central government.
  - Without more central government funding and support to achieve a transport mode shift and significantly better public passenger transport, the **removal of all parking requirements** will result in negative consequences, especially in terms of parking spill over and access for the disabled and service providers.
  - The document should give greater consideration to the **effects of climate change** on the urban environment, and how urban environments can support a low-carbon economy.
  - **Community involvement** in urban planning needs to be factored into the draft NPS-UD, and more clearly provided for. This includes community involvement in the discussion about intensification, and the need to consider the diversity and character of neighbourhoods.

### General government aims described in the discussion document

2. The Council agrees with the Government's focus on successful cities, and that the success of New Zealand's cities will affect New Zealand's overall economic, social, and cultural performance. Improving the way our towns and cities function is also critical to supporting



and fostering healthy local communities. The Council supports the objective of the Urban Growth Agenda, to improve housing affordability (underpinned by more affordable urban land), and along with this improve the choices for the location and type of housing, and access to employment, education and services; assist emission reductions and build climate resilience; and enable quality built environments, while avoiding unnecessary urban sprawl. These objectives are already embedded in the Christchurch District Plan, the Council's strategic framework, and other Council strategies and infrastructure planning documents. They are also part of good planning practice. The Council has had a successful record over several decades, in managing urban growth.

### **Timing and consultation**

3. The Council is disappointed at the very tight timeframes for providing a submission on the proposed NPS-UD, and that the consultation is occurring directly prior to the local body elections. This restricts the ability for the Council and its communities to provide feedback on this document.
4. The Council notes that the implementation of the policies contained in this document for communities in Christchurch could be very significant. However, there is limited potential for targeted engagement with affected communities built into the process, particularly the communities that might be identified for higher density development under P6C Option 2 in the discussion document. We submit that the process would benefit from more meaningful engagement with these communities.

### **One-size-fits-all approach**

5. The Council strongly believes that a one-size-fits-all solution across New Zealand's six major urban centres will not achieve the best outcomes for our cities. The objectives and policies in the proposed NPS-UD appears to be an approach that is better suited for cities that have an identified housing shortage, such as Auckland. Christchurch City does not have a housing capacity issue. This was demonstrated in Christchurch's first Housing Land Capacity Assessment in 2017/18 and in its Future Development Strategy 2018-2048 "Our Space", undertaken with adjoining councils. It is also evidenced by the government recently announcing its intention to sell all 75 Kiwibuild houses in Canterbury due to lack of demand.
6. Christchurch has other important, localised issues that inform our priorities. These include: addressing and mitigating the effects of natural hazards and climate change; regeneration of the Central City; restricting greenfield expansion to reduce transport costs, emissions and impact on versatile soils; transitioning to a low-carbon urban environment; and supporting growth and public transport corridors. The fact that local centres across New Zealand will have differing priorities should be properly considered in the finalised NPS-UD.
7. Christchurch's Central City is still very much in recovery mode and has not yet managed to attract the necessary critical mass of visitors, workers and residents needed to sustain a vital and viable Central City. The Central City lost around 23,000 workers, 3,000 residents, and 140,000sqm of retail floor space as a result of the earthquakes and its recovery remains of the utmost importance to our City. We are still well short of our aspirational regeneration targets of 60,000 workers and 20,000 residents in the central city; this is our immediate focus and where we suggest greater central government support ought to be directed. Any national policy direction that facilitates significant unplanned and dispersed growth outside the

Central City may undermine not only our priority earthquake recovery objectives, but the significant amount of public and private investment in the Central City to date.

### **Costs**

8. The Council is concerned about the costs of the process changes needed to implement the draft policies and objectives. The Council found it costly and onerous to implement the National Policy Statement on Urban Development Capacity, and the NPS-UD continues to impose similar requirements on major urban centres. It may even be more costly to implement since it contains additional requirements such as that of assessing the amount of development that will likely be taken up (O5 and P4A refers). This goes further than the previous feasibility assessment and will be difficult to determine as it is to some extent subjective. It is impossible for councils to have certainty regarding the eventual housing typology and costs of construction and prices at which these types of residential units will be offered. Zone rules can shape housing typologies and enable choice to some degree, but cannot determine or control the type of development that actually takes place.
9. The requirement for 'enough' development capacity that is feasible and 'likely to be taken up' to meet the demand for land and dwellings over the short, medium and long term, is appropriate but requires consideration of land banking, relative attractiveness of areas, and other matters in the same way as for previous feasibility assessments. However, Council is particularly concerned about the continued NPS requirement to effectively provide a (surplus) buffer of land or dwellings (20% extra in the short and medium terms and 15% extra in the long term) and to plan for infrastructure to be in place to service that land. This risks unnecessarily increasing Council costs.
10. The Council cannot fund the costs of infrastructure planning for buffers through development contributions, meaning that existing Council funds, borrowing, and ratepayers must cover these costs. Ratepayers and developers will pay a premium for these large buffers, through high holding costs, long cost recovery times and the risk of infrastructure being planned or provided that is underused or not used at all. This would put upward pressure on rates and on housing costs, which is contrary to the Government's objective of making housing more affordable.
11. The Long Term Plan is unlikely to be able to factor in these additional 20/15% buffers appropriately, because they are additional to the amount of growth that Statistics New Zealand is projecting will occur, and thus unlikely to pass an external audit. Any early investment or over-investment by councils close to their debt limits will lead to suboptimal overall capital investment simply to meet the requirements of the NPS. Thus support from central government will be needed in order to fund the additional infrastructure, if this requirement is retained.
12. The further requirement that infrastructure required for long-term capacity is identified in the relevant infrastructure strategy (P4A) is ambitious, given how little certainty there can be regarding eventual development to be serviced. The Council's 30-year Infrastructure Strategy is a high-level document only and cannot be used for detailed planning.
13. Some of the infrastructure required is the responsibility of central government or regional government, such as State Highways and Rapid Public Transport. However, business cases for these cannot include the 20/15% buffers, as that is a hypothetical situation. This means that it

will not be possible to provide sufficient infrastructure to meet the requirements of the proposed NPS-UD. One of the pillars of the Government's Urban Growth Agenda is infrastructure funding and financing, and the Council requests support from central government to fund the requirements of the NPS-UD in line with this.

14. The NPS-UD would also result in unnecessary costs associated with staff responding to ad-hoc requests for rezoning of greenfield land outside of areas identified for urban development (see page 38 of the discussion document). This could divert staff from working on other growth priorities such as growth corridors and Central City regeneration. (For more on the Council's view on this proposed policy, see the section on greenfield development below.)

### **Community involvement in local decision making**

15. The policies contained in the document will have wide-ranging implications for communities. However, the document makes little mention of communities and their needs and aspirations, and how they can be involved in decision making. The Council believes that the Government should consider providing resources that will enable people and community/residents groups to more easily obtain advice and support on planning matters, in order to better participate in district planning and resource consent matters. Community planning centres are just one of many examples of ways in which more government resourcing could enable better community involvement.
16. Engagement with communities should be a greater focus of the development of the NPS-UD. The timing of this consultation is very challenging for councils, in terms of being able to have an in-depth conversation with our communities on the impacts of the proposals. Because the discussion document gives different options for some of the policies within it, the final draft version of the NPS-UD should be put back out for public consultation, once the Government has decided which option they are proposing.

### **Extent of the Christchurch Urban Area**

17. Many of the policies in the NPS-UD will now only apply to Major Urban Centres, including Christchurch. Statistics New Zealand defines the Christchurch Urban Area as wholly contained within Christchurch City Council's boundaries. The application of the term 'Major Urban Centres' as set out on pages 19 and 20 of the discussion document should technically be consistent with the Statistics New Zealand definition of the Christchurch Urban Area, and thus for Christchurch not extend beyond the Christchurch City Council boundary. However, Greater Christchurch operates as a single housing and business market, so it is important that the proposed NPS-UD does apply also to those parts of Waimakariri and Selwyn Districts that form part of Greater Christchurch (as set out in Table 2). There are elements of the NPS that need to be specifically considered by those areas, for example intensification.

### **Successful cities and quality urban environments**

18. As mentioned above, the Council agrees with the Government's focus on successful cities. However, it is the Council's view that the proposed NPS-UD does not clearly convey what constitutes a 'successful city', nor how such a goal can be achieved. There is no overall direction and vision in the proposed NPS for how towns and cities should be growing and developing. While the draft objectives include a focus on long-term strategic planning that provides for 'quality urban environments', the document does not explain this term sufficiently, nor does it provide clear direction as to what constitutes such an environment.



19. There does not need to be uniformity in the features of all quality urban environments, and what is a quality urban environment. There must be room for areas to decide for themselves on the development of their urban environments, in keeping with central government objectives and policies. The NPS-UD should reference design guidelines from local authorities and encourage the use of Urban Design Panels and Design Advisory Committees in heritage areas to assess intensification proposals. Intensification must not be at the cost of existing built and landscape character, including significant areas of open space within urban areas. If intensification occurs in a uniform manner it could strip urban areas of the diversity and character that gives them “soul”. If the definition of a quality environment is to be determined by each local authority in consultation with its communities then the Council requests that this be made clear within the document.
20. The document focuses on the supply of affordable housing. However, indicators in housing and development must be considered alongside other indicators relating to deprivation, unemployment, education, and health issues. These factors are all part of the urban environment and affect many people directly and indirectly. The discussion document does not address these matters despite their importance to the quality of urban living. The Council appreciates that the Government has a number of programmes aimed at promoting the four wellbeings, and would like to see these referred to in the NPS-UD by way of context to provide assurance that the NPS-UD is part of a wider package of measures to achieve quality urban environments.
21. It is not clear that the focus on land supply solutions in the NPS-UD will adequately address the problem of housing affordability. The Greater Christchurch Urban Development Strategy and the Christchurch District Plan provide for sufficient land for housing for at least 30 years at current rates of take up. However, housing is still unaffordable for many people and we are still struggling to encourage Central City living over suburban greenfield locations. The Council does not agree with the apparent underlying assumption in the proposed NPS-UD that housing is unaffordable because the planning system is overly restrictive, preventing the market from supplying affordable land, and considers it simplistic to attribute any lack of development to planning rules alone. These are complex issues and the discussion document’s approach does not paint a full picture of how housing and land markets work in urban areas, nor does it mention funding to local government that might aid development or support public transport and community facilities.
22. The Council submits that the proposed NPS-UD should recognise that land values are primarily a function of the underlying highest use value of the land. The price of residential land is based on its residual value once house values and development costs are taken into account. This in turn means the proposed NPS-UD framework is unlikely to provide adequate prescriptions and tools for local authorities to tackle affordable housing. For example, it will not assist local authorities to justify, and survive challenges to, any requirements in plan changes to provide a proportion of affordable housing when rezoning land to a higher residential use.

### **Future Development Strategy (FDS)**

23. Overall, the Council supports the requirements for a Housing and Business Capacity Assessment (HBA) and FDS to be undertaken to inform Long Term Plans (LTPs), notwithstanding our concerns about funding for the 20/15% buffers. The assessments of

housing and business land development capacity are essential components of growth planning.

24. We consider that better alignment with LTP processes is desirable. However, in terms of timing, the next HBA and FDS will not be able to inform the 2021 LTP as the planning for this LTP has already commenced. It would be more appropriate for the next HBA and FDS to inform the subsequent LTP (2024), rather than be required to inform the 2021 LTP. This would also enable us to use the detailed, area-distributed 2018 census projections (expected late 2020) and would inform a full review of the Canterbury Regional Policy Statement, scheduled for 2022/2023.

### **Making room for growth – greenfield development**

25. The Council considers the policies around out-of-sequence greenfield development to be too directive, and inappropriate for application on a national scale.
26. The proposed NPS-UD would facilitate continued ‘business as usual’ greenfield development rather than demanding integrated subdivision and land use planning. The latter would better ensure quality while achieving higher density urban outcomes. There are broader network/facility planning and community development implications associated with outward growth that the document does not appear to have considered at all. Achieving quality urban environments in lower density greenfield developments can be difficult and expensive. If the NPS-UD aims to achieve higher densities in existing urban areas, it should also set minimum densities in greenfield areas.
27. As mentioned above, the Government has recently announced its intention to sell all 75 Kiwibuild houses in Canterbury due to lack of demand. Most of these unsold houses are in Selwyn and Waimakariri and greenfield areas, whereas the fewer houses in existing urban areas sold much better. Greenfields development as a proportion of the total new housing that the market has been providing in Christchurch City has been declining since 2013. Since 2017, the majority of housing, i.e. more than 50% of net new housing, has been within the existing urban area in the form of infill, rather than in greenfield areas. This indicates that these types and locations of homes are in demand, particularly amongst typical first-home buyers, and is further evidence that we should be focusing on quality intensification and all that this entails.
28. Directing councils to consider unplanned growth in greenfield areas would risk working against the requirements for evidence based plan-led intensification, and would impose time and resource costs on councils. If implemented, this policy would mean councils are required to spend large amounts of time responding to plan change requests, and community reaction and litigation, to the detriment of undertaking ‘responsive planning’. This policy also risks conflicting with the National Policy Statement on Highly Productive Land, and should therefore require consideration of whether or not the land in question is highly productive land.
29. Overall we consider that this proposal pulls in the opposite direction to the rest of the NPS-UD. If councils undertake the NPS requirements to assess plan-enabled capacity and respond to any shortfall through an FDS on a very regular basis, there should be no need to spend additional time and resources assessing the merits of such growth in less than optimum locations. We strongly oppose this aspect of the draft and suggest that the appropriate time to consider such ad-hoc opportunities is through the FDS process, in response to an identified

capacity shortfall, and potentially through a ‘call for sites’ stage in the FDS process (as is undertaken in the UK).

### **Making room for growth – intensification development**

30. The proposed NPS-UD is likely to require greater intensification than what is enabled in Christchurch’s recently-developed District Plan, without considering the local priorities specific to Christchurch. Such blunt measures to impose density could have significant adverse effects, for example on the character of areas or their historic heritage. There is also very little consideration of natural hazards such as flooding and liquefaction potential in the proposed NPS and none in the sections on intensification.
31. P6C Option 2 in the discussion document requires higher density around ‘centres’ and ‘frequent public transport stops’, but these terms are not defined. Christchurch has over 130 centres of a wide variety of sizes and functions, with around 100 of these being local centres which are not meant to be accessed by public transport but rather primarily by walking (these centres are not intended nor appropriate as growth modes). If this option were to proceed we request clarity on what these terms mean, and the omission of local centres, due to the risk of inconsistency across the country, and potential legal challenge on local interpretations.
32. In Christchurch, 10% of flat ‘urban area’<sup>[1]</sup> is already enabled for medium density within 800 metres of our Key Activity Centres, and in the Central City within a number of zones. This policy approach provides more than sufficient development capacity to meet projected long term needs<sup>[2]</sup>. If the Council were required to adopt the approach of increasing density around our centres (including local centres), this would increase to 60% coverage i.e. six times the current provision. This does not take into account further increased density around frequent public transport corridors, which is likely to be significant. The wording in P6C Option 2 would also require residential intensification within industrial zones, where they fall within 800 metres of frequent public transport stops. The Council does not support this because this land may be needed for industrial purposes. The potential effect of draft policy P6C Option 2 is illustrated by the maps the Council has provided as appendices to its submission. This degree of intensification is neither necessary nor desirable and such dispersed growth may run counter to our objectives of facilitating recovery of the Central City and Key Activity Centres.
33. Christchurch generally has a zoning pattern similar to the philosophy behind the P6C options. The higher density zones in the Christchurch District Plan surround the Central City and some of the largest centres. These centres are also served by frequent public transport. Christchurch is also considering options for higher density further along public transport corridors, as part of the Christchurch Spatial Plan work associated with the Greater Christchurch Future Public Transport Business Case. We would welcome further support from the Government for this work.
34. Overall, the Council’s preferred option is a revised Option 1 that enables councils to provide for higher densities in appropriate locations in response to their housing and business land capacity assessments.

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<sup>[1]</sup> Described as all industrial, commercial and residential zones (except residential hills)

<sup>[2]</sup> <http://greaterchristchurch.org.nz/assets/Documents/greaterchristchurch/Our-Space-final/Our-Space-2018-2048-WEB.pdf> - see page 15.



### **Prescriptive vs flexible requirements**

35. The NPS-UD combines prescriptive options, such as requiring higher densities in particular areas, with flexibility in wording, such as ‘except where evidence demonstrates that intensification should not be enabled’ (P6C). Providing a prescriptive direction with some flexibility is a valid approach but could create some difficulty, because the Council is required to give effect to the prescriptive part of the policy, with the application of the flexible policy open to debate and legal challenge. It would be costly and time consuming to test where there is sufficient evidence demonstrating that intensification should not be enabled. This could hold up the implementation of the NPS-UD. In some situations there would be no ability for local communities to have input into whether or not intensification should be enabled.

### **Car parking**

36. The removal of regulation around car parking (P7A Options 1-3) will support the rebuild of some centres such as the Central City (which already has parking minimums removed) and Lyttelton (for which the Council is proposing to use section 71 of the Greater Christchurch Regeneration Act to remove parking minimums), and may help to support a mode shift. However, to ensure the removal of rules is workable, on-street parking will need to be managed efficiently for businesses and residents, given that the city is still rebuilding. The Council will need central government to provide funding support for improved public and active transport options. This would mitigate the risk that the removal of parking rules will not provide a sufficient mode shift and result in negative consequences, particularly in terms of increased spillover parking in any local residential receiving environments that, under these proposals, will have no input in the decision to remove car parking rules.
37. While the Council supports the overall intent of the policy and would prefer to see Option 3 adopted, it considers that this is a level of detail that is possibly too low a level for a national policy direction. It is one of many factors that may decrease the quality of urban environments and the efficiency of land use, and it seems out of place therefore to isolate this at a national level.

### **Evidence for good decision making**

38. The test of ‘best available evidence’ should also be applied to the drafting of national policy statements. The discussion document does not appear to have been fully informed by current local government practice.
39. Current Resource Management Act processes such as plan changes for rezoning already require section 32 evaluation reports. The recent Christchurch District Plan review carefully considered intensification and greenfield development and ensured that the supply of residential land was adequate for all time periods - short, medium, and long term.

### **Climate change**

40. The Council considers that there is insufficient linkage between this NPS-UD and the government’s carbon zero initiatives, and that the NPS-UD could be strengthened in that regard. The proposed NPS-UD would benefit from a more robust consideration of the impacts of climate change on the urban environment. The focus of this NPS-UD on delivering more affordable and quality housing should also incorporate climate change mitigation and

response objectives such as making efficient use of land and infrastructure (which is important to local government planning and financing, and supports intensification), and facilitating the move to urban environments that support a low-carbon economy.

### **Working together**

41. The Council would like to build stronger relations with central government as part of a ‘whole of government approach’ to dealing with urban problems, particularly at a community level. The Council considers that central government could better work with local authorities on a collaborative basis, to provide a comprehensive and integrated approach to urban policy development and implementation. Although this proposed NPS is intended as a means of promoting the Urban Growth Agenda, it will need to be revised and to work alongside other initiatives to achieve this goal more effectively. For example, the Government could engage more directly with the Council to work particularly on growth corridor priorities, affordable housing projects, and Central City regeneration, and better integrate decision making through initiatives such as spatial planning.

## Comments on the proposed National Policy Statement on Urban Development- Responses on Consultation questions

### *Overview - Why a NPS is appropriate (pp.16-18)*

#### **1. Do you support a National Policy Statement on Urban Development that aims to deliver quality urban environments and make room for growth? Why/Why not?**

- Are there other tools under the RMA, other legislation or non-statutory tools that would be more effective in achieving a quality urban environment and making room for growth?

Comments:

- The intent is good, although we have some significant concerns about the objectives and policies in the NPS.
- Other possible tools that could supplement this include:
  - The Urban Design Protocol - the government could consider how its application could be strengthened through this NPS or in District Plans. The “principles of place-making” are a good tool for achieving quality urban environments.
  - The Government should consider economic instruments such as betterment levies and similar forms of value capture in relation to “windfall gains” from up-zonings, as additional tools to guide and lead the market place. It is acknowledged that there can be administrative issues, e.g. in calculating the land value increment and resulting charges; however they would help to encourage higher value land uses, rather than giving away gains from increased development opportunities as a right.

### *Replacing the NPS on UDC 2016 - Targeting cities that would benefit most (pp.18-20)*

#### **2. Do you support the approach of targeting the most directive policies to our largest and fastest growing urban environments? Why/why not?**

- Do you support the approach used to determine which local authorities are categorised as major urban centres? Why/why not?
- Can you suggest any alternative approaches for targeting the policies in the NPS-UD?

Comments:

- We accept that Christchurch and other major urban centres should be subject to the NPS objectives and policies on residential and business capacity and planning for intensification. However, a one-size-fits-all approach does not work, and we are not supportive of the most directive policy options indicated. See comments in table of comments on objectives and policies for more on this.

### *FDS (O1, P1A-P1I) (pp.21-25)*

#### **3. Do you support the proposed changes to future development strategies (FDSs) overall? If not, what would you suggest doing differently?**

- Do you support the approach of only requiring major urban centres to undertake an FDS? Would there be benefits of requiring other local authorities to undertake a strategic planning process?
- What impact will the proposed timing of the FDS have on statutory and other planning processes? In what way could the timing be improved?

Comments:



- Overall, the Council supports the requirements for a Housing and Business Capacity Assessment (HBA) and FDS to be undertaken to inform Long Term Plans (LTPs), notwithstanding our concerns about funding for the 20%/15% buffers. Assessment of housing and business land development capacities is an essential component of growth planning. We consider that better alignment with LTP processes is desirable. However, in terms of timing the next HBA and FDS will not be able to inform the 2021 LTP, as the planning for this LTP is already well advanced and the recently completed FDS and HBA under the NPS-UDC is already informing it.
- It would be more appropriate for the next HBA and FDS to inform the subsequent (2024) LTP. This would also enable Council to use the complete 2018 census projections for subparts of the Christchurch Urban Area (not expected till late 2020) and would inform a full review of the Canterbury Regional Policy Statement (RPS), scheduled for 2022/2023 (see the attached diagram).

*Making room for growth - Describing quality urban environments (O2, P2A-P2B) (pp.26-28)*

**4. Do you support the proposed approach of the NPS-UD providing national level direction about the features of a quality urban environment? Why/why not?**

- Do you support the features of a quality urban environment stated in draft objective O2? Why/why not?
- What impacts do you think the draft objectives O2–O3 and policies P2A–P2B will have on your decision-making?

Comments:

- The document does not sufficiently explain the term ‘quality urban environment’, nor does it provide clear direction as to what constitutes such an environment. The proposed description of contributors to quality environments is restricted in the range of matters covered, and also vague in the way it is expressed, e.g. what does “changing needs and conditions” include? It also seems to assume that if efficiency is achieved, this equates to quality, which is not always the case. The features described in the draft objective O2 are not features of a quality environment, but ways of enabling one.
- It may be unhelpful to define ‘quality’ so widely. If the definition of a quality environment is to be determined by each local authority in consultation with its communities, then the Council requests that this be made clear within the document.
- The first paragraph on page 27 lists elements that contribute to quality environments. However, there could be another list of elements that can detract from the quality of an environment, such as poor building design (size, appearance, configuration), lack of outdoor living space and poor design of what there is, lack of storage/waste management space, lack of neighbourhood cohesion and residential displacement (by short term accommodation providers in particular). It omits the fact that the quality of the environment can be adversely affected by district plan rules that are too permissive.
- The second paragraph on page 26 of the discussion document states, “The NPS-UD would give direction on what is meant by quality urban environments, both in existing and future urban environments”. This will need to reflect the potentially different nature of these two environments and the difficulty and costs of retrofitting an existing urban environment to meet a higher standard than currently exists, as well as urban environments of different scale, and the subjectivity involved.
- The focus should be on the need for close alignment between the NPS-UD, LTPs and infrastructure strategies, without duplicating effort.

- There is a missed opportunity to discuss the impacts of climate change on the urban environment. The proposed NPS should consider how to make efficient use of land and infrastructure and move to urban environments that support a low-carbon economy, alongside the delivery of affordable and quality housing.

*Making room for growth - Amenity values in urban environment (O4, P3A) (pp.28-30)*

**5. Do you support the inclusion of proposals to clarify that amenity values are diverse and change over time? Why/why not?**

- Do you think these proposals will help to address the use of amenity to protect the status quo?
- Can you identify any negative consequences that might result from the proposed objective and policies on amenity?
- Can you suggest alternative ways to address urban amenity through a national policy statement?

Comments:

- What, if any, additional guidance to that in the RMA e.g. in Part 2, will be given regarding how to make the necessary trade-offs?
- We need urban environments that reflect the identity of the place they are in, including a greater recognition of place making.
- The document lacks promotion of positive change to amenity values over time and recognition of the contribution of amenity values towards increasing a sense of well-being and identity. Therefore, we suggest the following text addition to P3A: “In making planning and consent decisions, decision-makers must recognise that amenity values a) increase a sense of identity and well-being; b) vary among individuals and communities; and c) change over time.”
- The proposed objective and policies could undermine existing heritage and urban design rules, given the apparent promotion of development rather than quality development. As currently drafted, they lack a forward looking and aspirational focus.
- The Council would like to understand whether the Government intends to consult in a meaningful way with potentially affected communities, as well as directly with councils.

*Making room for growth - Enabling opportunities for development (O5, P4A-P4G) (pp.30-33)*

**6. Do you support the addition of direction to provide development capacity that is both feasible and likely to be taken up? Will this result in development opportunities that more accurately reflect demand? Why/why not?**

Comments:

- There is a need to distinguish between development capacity and take-up of development capacity, as there are a number of influences outside of councils’ control (including global economics, market forces, and land banking) that affect take-up. It is difficult to predict development take-up, as this fluctuates over time, or to link this to affordability.
- Assessing the amount of development that is likely to be taken up in particular locations will be difficult. It is impossible for councils to have certainty regarding the eventual housing typology and price points at which dwellings are constructed.
- This appears to be double accounting for take up. Both the original and this new NPS include an additional margin of 20%/15% to account for development opportunities that are not taken up by the market. It is therefore unclear why it is necessary to also consider the likelihood of opportunities being taken up, when there is already additional land providing a

margin. In the context of reviewing the evidence base every three years and providing or identifying a 30-year supply of land, this is certainly not necessary.

*Making room for growth - Ensuring plan content provides for expected levels of development (O6, P5A-P5D) (pp. 33-35)*

**7. Do you support proposals requiring objectives, policies, rules, and assessment criteria to enable the development anticipated by the zone description? Why/why not?**

- Do you think requiring zone descriptions in district plans will be useful in planning documents for articulating what outcomes communities can expect for their urban environment? Why/why not?
- Do you think that amenity values should be articulated in this zone description? Why/why not?

Comments:

- It's not clear in the policy itself whether the intention is that the existing zone descriptions must be amended to be the same as the ones in the National Planning Standards or not, but from the description preceding this policy, this seems to be the intention. The National Planning Standards limit the number of zones, will be generic in their description of them, and will not be sufficiently prescriptive to provide the guidance anticipated. Nor will the provision of a zone description encourage or ensure that the type of development desired is actually built.
- All six major urban centres already include zone descriptions in their plans. What the NPS-UD is seeking to achieve with this policy is already accomplished by zone objectives and policies in those same plans. Christchurch City Council submitted in opposition to the zone descriptions in the National Planning Standards being given statutory weight during consultation on the Standards, as many of the zone descriptions are vague, not fit for purpose, and contrary to local strategic objectives. In some cases, giving statutory weight to the descriptions will work against the stated purpose of the NPS-UD itself by, for example, making it easier to use residential-zoned land for non-residential activities. For further comment on these proposed policies, please refer to the table of comments on the draft objectives and policies.

*Making room for growth - Providing for intensification (O7, P6A-P6D) (pp.35-38)*

**8. Do you support policies to enable intensification in the locations where its benefits can best be achieved? Why/why not?**

- What impact will these policies have on achieving higher densities in urban environments?
- What option/s do you prefer for prescribing locations for intensification in major urban centres? Why?
- If a prescriptive requirement is used, how should the density requirements be stated? (For example, 80 dwellings per hectare or a minimum floor area per hectare).
- What impact will directly inserting the policy to support intensification in particular locations through consenting decisions have?

Comments:

- Locating higher-density development in and around centres, to support closer matching of housing and jobs, is already enabled to a large extent in Christchurch. The zoning has been achieved through the identification of Key Activity Centres in the Canterbury Regional Policy Statement, and is simply good planning practice. The higher-density zones in the



Christchurch District Plan surround the Central City and some of the largest centres. These centres are also served by frequent public transport. Christchurch is also considering options for higher density further along public transport corridors, as part of the Christchurch Spatial Plan work associated with the Greater Christchurch Future Public Transport Business Case.

- 10% of Christchurch's 'urban area' is already enabled for medium density within a walkable catchment of the Central City and Key Activity Centres, within our Residential Medium Density, Residential Central City and some commercial and Residential New Neighbourhood Zones. **Together this policy approach provides more than sufficient development capacity to meet projected long term needs.** Current zonings and their extents are already adequate to provide for short, medium and long term needs.
- If the approach of increasing density around all centres (including local centres) was adopted, this would increase to 60% coverage, i.e. six times the current provision enabled in Christchurch. If densities were also increased around the higher frequency bus routes, this would increase to 70%. The Council has provided maps as part of its submission, to illustrate these effects.
- Over provision of medium density opportunities is likely to lead to its provision in less than optimal suburban locations, with adverse implications for efficient infrastructure planning and for Central City recovery.
- The focus of the document should be on comprehensively planned, quality and place-appropriate development (outcomes) as opposed to prescriptiveness or not (methods).
- Mandating minimum densities so much higher than current densities is a concern as this could well increase vehicle use, unless there is Government funding to support improvements to the public transport system.
- Note that in many cases, the densities achieved at the moment are in fact higher than the minimum set in the Canterbury Regional Policy Statement, which requires 30hh/ha for new development in existing built up areas outside the Central City (i.e. excluding greenfields areas). In Christchurch's Residential Medium Density zone, new development is on average achieving over 40hh/ha, with larger sites generally being higher than this. However, the density minimum of 30 hh/ha works well for smaller or awkwardly-shaped sites where site amalgamation cannot occur. If the HBA and FDS process works as intended, to enable sufficient development capacity, there is no need to go further.
- A prescriptive requirement will be more likely to enable intensification, but it needs to be clear (i.e. terms like centres, frequent bus routes, central city etc defined, to avoid costly delays through legal challenges when Councils tried to implement it), and appropriate to the circumstances of the 6 major urban centres. Suggested wording is provided in the table.
- Density requirements should be stated as dwellings per hectare. We note the question mentions 80 dwellings per hectare, but the policy mentions 60.

#### *Making room for growth - Providing for further greenfield development (pp.38-40)*

#### **9. Do you support inclusion of a policy providing for plan changes for out-of-sequence greenfield development and/or greenfield development in locations not currently identified for development?**

- How could the example policy better enable quality urban development in greenfield areas?
- Are the criteria in the example policy sufficiently robust to manage environmental effects to ensure a quality urban environment, while providing for this type of development?

- To what extent should developers be required to meet the costs of development, including the costs of infrastructure and wider impacts on network infrastructure, and environmental and social costs (recognising that these are likely to be passed onto future homeowners and beneficiaries of the development)? What impact will this have on the uptake of development opportunities?
- What improvements could be made to this policy to make development more responsive to demand in suitable locations beyond areas already identified for urban development?

Comments:

- The Council strongly opposes the inclusion of this policy, which would be contrary to the otherwise good intent of the NPS to deliver well-considered, integrated subdivision, land use and infrastructure planning. The latter can better ensure quality urban environments while achieving higher density.
- There are broader network/facility planning and community development implications associated with outward growth that the document does not appear to have considered. Achieving quality urban environments in lower density greenfield developments can be difficult and expensive. If the NPS-UD is to require higher densities in existing urban areas, it should also consider setting minimum densities in greenfield areas.
- Because the FDS is reviewed so frequently, new greenfield opportunities can be considered on a regular basis anyway. Private plan changes for rezoning can be proposed at any time and must be processed (this applies to the Christchurch District Plan, where nearly all the provisions have been operative for more than two years). Promoting proposals for greenfield development beyond the existing planning framework is providing a solution to a problem that does not exist.
- The text for the example policy states that “existing urban boundaries or planned land release sequences are sometimes defended to encourage a particular urban settlement pattern, or to manage infrastructure costs.” This implies that a consolidated pattern of development might not be a good thing, and/or that managing infrastructure costs is not a legitimate aim for local government.
- The policy is inconsistent with the NPS-HPL, because the many of the major urban centres, like Christchurch are surrounded by Highly Productive Land (HPL), and the NPS is seeking to avoid urban development on HPL. Under the proposed policy in the NPS-UD there is no reference to HPL being a consideration, so the policy could end up requiring Councils to provide for urban development on HPL, when the NPS-HPL seeks to prevent that. This policy means that Councils will have to try and implement two conflicting National Policy Statements, which will lead to costly legal challenges as to which NPS takes precedence.

*Making room for growth - Removing minimum car parking requirements (PTA - 3 Options) (pp.40-42)*

**10. Do you support limiting the ability for local authorities in major urban centres to regulate the number of car parks required for development? Why/why not?**

- Which proposed option could best contribute to achieve quality urban environments?
- What would be the impact of removing minimums in just high and medium-density, commercial, residential and mixed use areas, compared with all areas of a major urban centre?
- How would the 18 month implementation timeframe impact on your planning processes?

- What support should be considered to assist local authorities when removing the requirement to provide car parking to ensure the ongoing management of car parking resources?

Comments:

- For further comment on each of the options, see the table of comments on the draft objectives and policies.
- Removing minimums in just high and medium-density areas would lead to economic gain for developers, and an increased need to manage on-street parking, in the short and medium term. Buildings for commercial use are likely to still include internal car parking to attract tenants but residential buildings may not.
- In the long term removing minimums would allow cities to be shaped more sustainably as areas become denser and the use of space is used more efficiently.
- An 18-month implementation timeframe may be able to be achieved, but is not desirable as it is clear that many communities oppose a lack of car parking in their commercial centres. Alternatives such as communal off-site parking take time to implement. As noted in the table of comments on the draft objectives and policies, removal of parking requirements needs to be phased in as public transport is improved, and should not include the removal of mobility parking standards.
- A parking strategy should be considered and implemented for best management, to provide guidance to local authorities on how to best manage development and parking. A good parking strategy will include all or some of the following: mode choice, pricing, prioritisation, sharing, effective utilisation, user information, adaptability, peak management, and quality and cost-benefit analysis.
- We would not support the option of removing maximums, as it would not enable Councils to control car parking, which removes one of the levers to promoting mode shift.
- Out of the options, Option 3 would be the option that is less risky.

*Making room for growth - More directive intervention to enable quality urban development (pp.42-45)*

**11. Do you think that central government should consider more directive intervention in local authority plans?**

- Which rules (or types of rules) are unnecessarily constraining urban development?
- Can you identify provisions that are enabling higher-density urban development in local authority plans that could be provided for either nationally or in particular zones or areas?
- Should a minimum level of development for an individual site be provided for across urban areas (for example, up to three storeys of development is a permitted activity across all zones)?
- Given the potential interactions with the range of rules that may exist within any given zone, how could the intent of more directive approaches be achieved?

Comments:

- The Council does not consider this to be necessary. If councils carry out their NPS-UD requirements to complete a HBA and FDS, there is no capacity issue left to resolve. If there is a capacity issue to resolve, that is the appropriate time to consider the full range of tools, including district plan rules. The current NPS already includes a direction to consider “all practicable options” when considering a planning response. In Christchurch, we have abundant capacity in existing urban areas without the need to resort to requiring a minimum level of development across urban areas. To do so may be contrary to other objectives for our



city including promoting an urban form that makes efficient use of land, is attractive and inclusive, and responds to climate change imperatives.

- Comprehensive redevelopment could provide more housing of higher quality. This would be easier to achieve if the current model of subdivision and land use planning was overhauled to fully integrate the two processes.
- District plan rules work together as packages to determine, and cumulatively contribute to, the quality of the urban environment and the identity of places and neighbourhoods. For example, there are special, earthquake-related reasons for height restrictions within Christchurch that would not be appropriately included in a one-size-fits-all removal of district plan rules. Precluding or replacing any of them, including via a generally applicable National Planning Standard as suggested on page 44 of the discussion document, requires very careful consideration, including of the potential perverse outcomes from doing so.
- There are further comments on this issue in Councils table of detailed comments under the section “More directive intervention to enable quality urban development.”

*Evidence for good decision-making - Using market information to make decisions (O9, P8A-P8D) (pp.46-48)*

**12. Do you support requirements for all urban environments to assess demand and supply of development capacity, and monitor a range of market indicators? Why/why not?**

Comments:

- Agree that it is appropriate to monitor key indicators, although not on a quarterly basis. Half-yearly monitoring would be sufficient to indicate trends.

*Engagement on urban planning - Taking into account issues of concern to iwi and hapū (O9, P9A-(B) (pp.49-51)*

**13. Do you support inclusion of policies to improve how local government works with iwi, hapū and whānau to reflect their values and interests in urban planning?**

- Do you think the proposals are an appropriate way to ensure urban development occurs in a way that takes into account iwi and hapū concerns?
- How do you think local authorities should be directed to engage with Māori who do not hold mana whenua over the urban environment in which they now live?
- What impacts do you think the proposed NPS-UD will have on iwi, hapū and Māori?

Comments:

- Councils already consult with iwi during and after the preparation of draft plan changes and plan reviews, and must take Iwi Management Plans into account when preparing or changing their district plans. This includes consultation in regard to plan changes for rezonings and plan changes providing for more intensification. Therefore the policies included in this proposed NPS add little to this.
- As well as urban environments, Iwi are concerned about resource management provisions for rural environments and for kainga nohoanga (papakainga) zones, which in the case of Christchurch are predominantly located on Banks Peninsula, and except for Rapaki, outside of the Greater Christchurch area.
- It should be noted that Christchurch has a Te Hononga Council - Papatipu Runanga Committee, which is a standing committee of Council directly managing Council's relationship with runanga in its rohe, and serviced by two permanent staff dedicated to the Council- Ngāi Tahu relationship.

*Engagement on urban planning - Coordinated planning (O10, P10A-P10C) (pp.52-53)*

**14. Do you support amendments to existing NPS-UDC 2016 policies to include working with providers of development and other infrastructure, and local authorities cooperating to work with iwi/hapū? Why/why not?**

Comments:

- These comments are relevant to providers of 'other infrastructure' only. It is unclear how this is intended to work in practice, particularly P10B. Our experience engaging with providers of 'other infrastructure' in preparing the first capacity assessment was underwhelming in terms of interest and contributions to inform any useful outcome. Many such providers chose not to engage at all, some are typically 'late reactors' to land use change and many plan their infrastructure to respond to, rather than inform growth plans and/or have shorter planning horizons (e.g. electricity infrastructure providers typically plan for 10- 15 year timeframes).
- Every additional requirement in national direction requires time and resources and if it doesn't add value at the planning stage, it should be removed.
- For such engagement to be meaningful, there needs to be a mandate for all parties to participate, not just councils. We would be interested in whether the Government has asked these providers what involvement (if any) would add value or whether it is only the outcome of the NPS (a clear idea of where growth is anticipated) that is most useful to them.

*Timing (pp.54-55)*

**15. What impact will the proposed timing for implementation of policies have?**

Comments:

- Better alignment with LTP processes is a desirable outcome. However, as stated above, there is no ability for the next HBA and FDS to inform the 2021 LTP as the planning for this has already commenced.
- The next HBA and FDS will inform the subsequent LTP (2024) and this would also enable Christchurch City Council to use the 2018 detailed census projections (expected late 2020). All of this will inform the full review of the Canterbury Regional Policy Statement, scheduled for 2022/2023.

*Guidance and implementation support (p56)*

**16. What kind of guidance or support do you think would help with the successful implementation of the proposed NPS-UD?**

Comments:

- Very clear guidance and clear definitions in the NPS itself.
- The guidance provided with the 2016 NPS proved somewhat inadequate, pointing to information sources that were not always fit for purpose, and including some statements that were not fit for purpose. For example, the guidance states (page 67) that, "It is possible to visually inspect and record activity in a relatively short space of time, for example, to drive around all the industrial areas in most large or high growth urban areas would generally take less than two weeks." The footnote indicates that this level of surveying was undertaken for the Auckland Proposed Unitary Plan hearings. While this generalised level of information might have sufficed in that context, it would certainly not meet the requirements of the NPS.
- Most local authorities do not have the staffing resources that Auckland Council has. In reality, meeting the requirements of the last NPS proved expensive and time consuming for Christchurch City Council.

*Alignment with other national direction under the RMA (pp57-61)*

- 17. Do you think there are potential areas of tension or confusion between any of these proposals and other national direction? If so, please identify these areas and include any suggestions you have for addressing these issues.**

Comments:

- Yes, there is a clear area of inconsistency between the proposed policies in the NPS on greenfield development and the draft NPS on Highly Productive Land.
- Even without this inconsistency, the proposed directives to more seriously consider approving plan changes to rezone land in locations that are “out of sequence” has the potential to undermine growth strategies and the efficiencies of consolidated patterns of urban development.

- 18. Do you think a national planning standard is needed to support the consistent implementation of proposals in this document? If so, please state which specific provisions you think could be delivered effectively using a national planning standard.**

Comments:

- No. A one-size fits-all standard for how urban development should be managed would be completely inappropriate.

*Questions from Appendix 3 - Policies on Housing and Business Development Capacity Assessments (AP1-AP16) (pp.71-78)*

- A1. Do you support the changes to the HBA policies overall? Are there specific proposals you do or do not support? What changes would you suggest?**

Comments:

- The Council welcomes the greater flexibility proposed for the preparation of an HBA, particularly around timing and the ability to update rather than conduct a wholesale review of the assessments to reduce compliance costs. It remains to be seen whether this actually translates into lower costs given that the whole process needs to be undertaken in any event to yield updated results.
- We support the need for a strong evidence base. Assessment of housing and business land development capacity are an essential component of growth planning.
- We do not support the existing and ongoing requirement to assess the commercial feasibility of business land. This is too complex to model at a strategic level in a similar way to the housing feasibility assessment and the proposed approach outlined in the guidance (multi-criteria assessment) is too resource intensive and does not actually test commercial feasibility. Rather, it assesses key characteristics that may have some influence on feasibility and take-up in a general way; these are factors that we are well aware of for our constituent areas/locations, without needing to undertake complex assessments of “commercial feasibility”.
- The Council supports the HBAs being updated in time to inform the next FDS and LTPs. However we note that to best align with these processes and utilise the 2018 census projections and inform our CRPS review, it is highly desirable for work on the HBA to commence after the release of the detailed census projections, and be completed by December 2021. This will inform the 2024 LTP.
- We support the requirement to test different scenarios. However, one scenario has to be landed to inform subsequent planning and infrastructure decisions, so more guidance on this would be useful.



- See comments above regarding the double accounting for take up and the 15%/20% margins.
- We share the concerns expressed by Market Economics about the appropriateness of using price efficiency indicators, as these perpetuate a misunderstanding that higher urban land values indicate that the land market is operating inefficiently, when instead those large differences in value reflect efficient urban growth patterns<sup>1</sup>.  
<http://www.marketeconomics.co.nz/LiteratureRetrieve.aspx?ID=215762>
- The draft policy AP13's reference to different zones is too specific and should only relate to commercial and industrial. Otherwise, for Christchurch City this would require an assessment of capacity for a range of zones including three different industrial zones, seven different commercial zones, and special zones such as the airport and Lyttelton Port.
- AP15 - the reference to tenure would be too onerous for both business and housing. Tenure information is not readily available, and houses and businesses transition between tenure types over time without notification to Council.
- AP17 – guidance on what constitutes 'major' (land owners) would be welcomed. It would also be helpful to clarify that there should be input from requiring authorities that have the benefit of designations in that major urban centre. This will avoid councils contacting requiring authorities who only have an interest in other centres (as the Council did last time).

**A2. What do you anticipate the impact of the proposed policies (and any related changes) would be on planning and urban outcomes?**

Comments:

- We do not expect that the changes in the proposed NPS will have much effect on planning and urban outcomes, and they will certainly not deliver the benefits set out in the Regulatory Impact Statement e.g. on pages 3-4 of that document. Any real change would come about as a result of the more draconian and directive policies proposed (e.g. requiring intensification at levels far beyond demonstrable need, and the promotion of dispersed greenfield development), if these are carried through into the final NPS. Outcomes under these policies would be detrimental to urban amenity in Christchurch and to existing (largely efficient) growth management strategies.

**A3. Are the margins proposed in policies AP3 and AP12 appropriate? If not, what should you base alternative margins on? (e.g. using different margins based on higher or lower rural-urban price differentials).**

Comments:

- It does not really matter what the margins are. The more relevant considerations are:
  - whether the margins represent double counting in view of the feasible and likely requirements (AP9); and
  - whether the margins are appropriate in view of the Audit office reviews of council Long Term Plans, when LTPs cannot realistically be based on anticipated growth **plus** margins.

**A4. How could these policies place a greater emphasis on ensuring enough development capacity at affordable prices?**

Comments:

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<sup>1</sup> Fairgray (June 2019) Making Room from Growth – S strategy founded on poor economics

- Housing affordability is a much wider question than urban planning strategies. Increasing the supply of land and providing for intensification to occur are policies that will not, in themselves, ensure affordable prices. Any assumption that they will is based on an overly simplistic analysis of land, development, and construction markets.

**A5. Do you support the approach of targeting the HBA requirements only to major urban centres? Why/why not?**

Comments:

- This may be advantageous for smaller councils, in that it reduces administrative reporting. However, it may increase the risk of creating an NPS approach that does not provide a comprehensive vision for New Zealand's cities and towns.

## Comments on the proposed National Policy Statement on Urban Development

### Future Development Strategy (pp 23-24)

Proposed objective/policy	Notes	Comments
<b>General comments about the document</b>		<ul style="list-style-type: none"> <li>• The document could do more to support long-term strategic planning, or quality outcomes. It lacks direction and vision for the growth and development of NZ towns and cities. This should be the focus of the document, rather than matters such as reducing regulation.</li> <li>• It would be more useful for government to develop a national integrated growth and infrastructure strategy that identifies key locations for growth and infrastructure investment (eg transport corridors in the bigger cities), promotes the integration of land use and infrastructure, and considers the country as a whole, not just the highest growth or largest cities in isolation.</li> <li>• A Future Direction Strategy is also referred to in the discussion document, so it needs to be clear what terminology is proposed.</li> </ul>
<p>O1: To ensure long-term strategic planning, reflected in planning documents, provides for:</p> <p>a) integrated land use and infrastructure</p> <p>b) quality urban environments.</p>	<ul style="list-style-type: none"> <li>• Applies to all urban environments</li> <li>• Applies immediately</li> <li>• Amended NPS-UDC 2016 objective OD1</li> </ul>	<ul style="list-style-type: none"> <li>• The definition of quality in terms of urban environments is very weak eg there is no discussion of liveability/good design etc. The discourse on amenity should be around providing vision on the anticipated outcomes for a place or type of place, not a zone.</li> <li>• The proposed NPS-UD will not in itself ensure more vibrant and liveable cities, as it does not focus on improved environmental quality in our cities. Its focus appears to be almost solely on the supply of housing, and in that regard it is little different to the previous NPS.</li> <li>• The proposed NPS continues “business as usual” greenfield development rather than requiring integrated subdivision and land use planning, which could better ensure quality but yet higher density urban outcomes.</li> <li>• The document appears to provide equal support for greenfields development and for intensification. While all types of growth have infrastructure implications, there are also broader network/facility planning and community development implications associated with outward growth that do not appear to have been considered. Achieving quality urban environments in lower density greenfields developments can be difficult and expensive.</li> </ul>

		<ul style="list-style-type: none"> <li>• Removing rules and requirements for development may be laudable but this is not likely to result in higher quality outcomes. If intensification is achieved via District Plan changes involving directive policies, or simplistic rules, higher quality outcomes may be lost.</li> <li>• Community, community aspirations and community engagement in place-based decision making are barely mentioned in the document.</li> <li>• As a result of the recent fast track District Plan Review in Christchurch, and central government's Statement of Expectations in the Order in Council controlling the District Plan, the City already has a very permissive District Plan. There is a widespread perception that the community was largely left out of the process of developing that Plan. Further direction by the NPS as to how the City should develop will be unpopular with the public in light of the City only now transitioning to a greater degree of local decision-making.</li> </ul>
<p>P1A: Local authorities must, every three years, prepare or update a Future Development Strategy (FDS). An FDS is to demonstrate, for the medium and long term, how the local authority will:</p> <p>a) achieve quality urban environments in its existing and future urban areas and</p> <p>b) meet residential development capacity bottom lines</p> <p>c) allocate development capacity across existing and future urban areas.</p>	<ul style="list-style-type: none"> <li>• Applies to major urban centres (all others encouraged to give effect to these policies)</li> <li>• Drafted in time to inform relevant LTPs</li> <li>• Amended NPS-UDC 2016 policies PC12, PC14c</li> </ul>	<ul style="list-style-type: none"> <li>• The Council supports the approach of not specifying an exact date for publishing an FDS, due to lack of previous alignment between FDS and LTP timetables for infrastructure planning.</li> <li>• This will mean that the next HBA will need to be completed by December 2021 in order for it to inform Council's 2024 Long Term Plan. Planning for the 2021 LTP is currently underway in Council, based on information available now, e.g. the 2017 HBA. We require a substantial lead-in time for LTP planning across the various units and functions of Council and to allow for community, Councillor and Community Board input. It will not be possible for the NPS-UD to inform the 2021 LTP, as it is too late.</li> <li>• This policy is not consistent with P1D, which also refers to business capacity. The requirements for business land should be more clearly stated in P1A.</li> </ul>
<p>P1B: An FDS need not be published as a separate document, but can be part of any other suitable document, for example a spatial plan.</p>	<ul style="list-style-type: none"> <li>• Applies to major urban centres (all others encouraged to give effect to these policies)</li> </ul>	<ul style="list-style-type: none"> <li>• We question whether this is a critical enough matter to be included as a policy. It is more important for major urban centres to demonstrate that they have met the policy requirements. A guidance note would be sufficient to cover this flexibility.</li> </ul>



	<ul style="list-style-type: none"> <li>• Drafted in time to inform relevant LTPs</li> <li>• Amended NPS-UDC 2016 policies PC14</li> </ul>	
<p>P1C: Every FDS must be informed by:</p> <p>a) the most recent HBA for the major urban centre</p> <p>b) analysis of costs and benefits of different spatial scenarios for accommodating growth</p> <p>c) scenario testing of different growth rates to ensure strategy is robust</p> <p>d) the long-term plans and infrastructure strategies required under the Local Government Act 2002, and any other relevant strategies, plans and documents</p> <p>e) iwi and hapū resource management issues of concern/significance for the urban environment, including those expressed in any relevant planning document recognised by an iwi authority.</p> <p>Every FDS must consider other national direction.</p>	<ul style="list-style-type: none"> <li>• Applies to major urban centres (all others encouraged to give effect to these policies)</li> <li>• Drafted in time to inform relevant LTPs</li> <li>• Amended NPS-UDC 2016 policies PC12, PC13c, PC14b</li> </ul>	<ul style="list-style-type: none"> <li>• This policy is merely listing matters which should be considered in developing a growth strategy. What should be done after scenario testing? Set out options for planning and policy responses? What if growth rates turn out to be less than predicted (meaning councils are not able to repay debt incurred in providing new infrastructure and services)? Is the NPS only concerned with requiring a policy response if growth rates are higher than anticipated?</li> <li>• Further, the direction that “long term plans and infrastructure strategies, and other relevant plans and documents” must be considered, is equally vague. Council could merely acknowledge other directions but choose not to weight them highly. This is an issue with the debate on protecting versatile soils versus providing for more housing opportunities. Greater national direction as to the circumstances in which one or the other should be weighted more highly would be valuable.</li> <li>• See comment above about requirement to be drafted in time to inform relevant LTPs. This will need to be the 2024 LTP as there is insufficient time to prepare a HBA, let alone an FDS update to meet the 2021 LTP.</li> </ul>
<p>P1D: Every FDS must identify:</p> <p>a) areas where evidence shows urban development must be avoided</p> <p>b) future infrastructure corridors/locations</p>	<ul style="list-style-type: none"> <li>• Applies to major urban centres (all others encouraged to give effect to these policies)</li> </ul>	<ul style="list-style-type: none"> <li>• The amended definition of ‘other infrastructure’ to include ‘<i>public</i> open space’ in Appendix 2 (relevant to this Policy) is confusing and conflicting. ‘Other infrastructure’ is meant to be distinguished from ‘development infrastructure’, which is council controlled. The addition of the word ‘public’ implies that ‘public open space’ is not controlled by Council, which is usually not true.</li> </ul>

<p>c) broad locations for long-term feasible residential and business development capacity</p> <p>d) broad locations for residential intensification that contributes to quality urban environments</p> <p>e) the development infrastructure and other infrastructure needed to support growth</p> <p>f) how to provide for business land</p> <p>g) how hapū and whānau aspirations for urban development on whenua Māori within their rohe will be taken into account</p> <p>h) how the strategy will be implemented. This must include:</p> <p>i. estimates of local authority contributions to development infrastructure funding, and the indicative timing and sequencing</p> <p>ii. financing gaps or other risks to the delivery of development infrastructure needs for the medium and long-term, and options for resolving this</p> <p>iii. processes for working with land owners, developers and infrastructure providers to implement the FDS.</p>	<ul style="list-style-type: none"> <li>• Drafted in time to inform relevant LTPs</li> <li>• New policy</li> </ul>	<ul style="list-style-type: none"> <li>• The policy requirement to identify “development infrastructure and other infrastructure needed to support growth” could be strengthened to require consideration of the most appropriate (effective and efficient) infrastructure that will contribute to achieving a “quality urban environment”. For example, previous responses under growth strategies have primarily looked to motorways to support growth, and there is now greater recognition of the need for changed approaches to investment.</li> <li>• The Council supports the direction for an implementation plan (or like document), but suggests that these policy requirements in themselves do not achieve implementation. Rather they are some of the steps required to understand the risks and uncertainties with implementation. How this policy will be deemed to be met requires further consideration. P1D could be rewritten to be integrated with P1H as one policy not two.</li> <li>• Clause (h)(i) requires discussion because even providing indicative costings and timings for long term infrastructure (that beyond the ten year LTP) is not straightforward and there will be significant resource implications. This implies that Council’s Infrastructure Strategy for the 30 year period will need to be developed to nearly the same level of robustness as the ten year LTP, which is unrealistic in itself because circumstances always change over time. There is also no guarantee that the estimated funding identified survives the LTP process each cycle. Perhaps the requirement could be that a draft FDS or implementation plan, including estimates, is prepared prior to the LTP but that the FDS is finalised upon adoption of the LTP.</li> <li>• For bulk infrastructure funded publicly, the planning cycle is at least 30 years, and investment decisions are not reversible. It is best practice to integrate infrastructure and urban development planning. However the policy should recognize that integrated planning is an iterative process, where the future development strategy will not only inform infrastructure strategies but will also itself need to be responsive to network utility infrastructure plans, which direct long-term funding for network utility capacity.</li> <li>• Policy (h)(iii) is a vague requirement. It would be helpful to set out any minimum expectations for how this occurs.</li> </ul>
<p>P1E: In addition to the policies P10A–P10C, when local authorities</p>	<ul style="list-style-type: none"> <li>• Applies to major urban centres (all others</li> </ul>	<ul style="list-style-type: none"> <li>• See above comments about timing and alignment with LTPs.</li> <li>• Collaboration with our partners and other agencies is supported and is best practice.</li> </ul>

<p>are developing or updating FDSs for a major urban centre they must:</p> <p>a) engage on their FDS with neighbouring local authorities where there are significant connections between infrastructure or communities</p> <p>b) work with relevant central government agencies</p> <p>c) give local iwi and hapū opportunities to identify the resource management issues of concern/significance to them relating to urban environments.</p>	<p>encouraged to give effect to these policies)</p> <ul style="list-style-type: none"> <li>• Drafted in time to inform relevant LTPs</li> <li>• New policy</li> </ul>	
<p>P1F: When developing or updating an FDS, local authorities:</p> <p>a) must undertake a consultation process that complies with either Part 6 of the Local Government Act 2002 or Schedule 1 of the Act</p> <p>b) may combine that process with any other consultation process occurring on another related matter, such as the documents referred to in [P2H].</p>	<ul style="list-style-type: none"> <li>• Applies to major urban centres (all others encouraged to give effect to these policies)</li> <li>• Drafted in time to inform relevant LTPs</li> <li>• Amended NPS-UDC 2016 policy PC14a</li> </ul>	<ul style="list-style-type: none"> <li>• There is a typo in the reference to P2H (which does not exist), so this policy is unclear. It also does not cover the possibility of using consultation processes that are shortened by the streamlined planning process in Section 80B and 80C of the Act.</li> </ul>
<p>P1G: Local authorities must have particular regard for their medium to long-term development capacity allocation as set out in the FDS, when preparing changes to regional policy statements, regional plans and district plans.</p>	<ul style="list-style-type: none"> <li>• Applies to major urban centres (all others encouraged to give effect to these policies)</li> <li>• Drafted in time to inform relevant LTPs</li> <li>• New policy</li> </ul>	<ul style="list-style-type: none"> <li>• What is meant by particular regard in this context? Is it expected that RPSs or regional plans set out how the development capacity allocation is to be achieved? If so the more appropriate wording would be “give effect to”. The risk is that the statutory responses could be changed by the submission process (potentially weakened), particularly if development capacity allocation is weighted towards achieving a desired rate of intensification.</li> </ul>

<p>P1H: Local authorities are strongly encouraged to use their FDS to inform the relevant long-term plans and infrastructure strategies required under the Local Government Act 2002, the Regional Land Transport Plans under the Land Transport Management Act 2003, and any other relevant strategies, plans and documents. [See P2F]</p>	<ul style="list-style-type: none"> <li>• Applies to major urban centres (all others encouraged to give effect to these policies)</li> <li>• Drafted in time to inform relevant LTPs</li> <li>• New policy</li> </ul>	<ul style="list-style-type: none"> <li>• This policy is not required at all, as an FDS and the evidence base that it was founded on would always be used to inform these other key implementation documents.</li> <li>• It would be more appropriate to delete this policy and rely on a stronger policy on “implementation” (see comments on Policy P1D above).</li> </ul>
<p>P1I: Local authorities shall update their FDS every three years, in time to inform relevant long-term plans and infrastructure strategies required under the Local Government Act 2002, and Regional Land Transport Plans required under the Land Transport Management Act 2003.</p>	<ul style="list-style-type: none"> <li>• Applies to major urban centres (all others encouraged to give effect to these policies)</li> <li>• Drafted in time to inform relevant LTPs</li> <li>• New policy</li> </ul>	<ul style="list-style-type: none"> <li>• See comment above about the issues for timing and alignment with LTP process.</li> <li>• The NPS requirement to provide for buffers over and above projected growth could have an adverse effect on the audit of LTPs by Audit NZ, if the figures for the two different processes were used. These audits are required before LTPs are signed off.</li> </ul>



## Making room for growth (pp 27-28)

<p>O2: To enable quality urban environments that make it possible for all people, whānau, communities and future generations to provide for their well-being, including by:</p> <p>a) offering people access to a choice of homes that meet their demands, jobs, opportunities for social interaction, high-quality diverse services and open space</p> <p>b) providing businesses with economies of scale, with access to many consumers, suppliers, skilled people and sources of innovation</p> <p>c) using land, energy and infrastructure efficiently</p> <p>d) responding to changing needs and conditions.</p>	<ul style="list-style-type: none"> <li>• Applies to all urban environments</li> <li>• Applies immediately</li> <li>• New objective</li> </ul>	<ul style="list-style-type: none"> <li>• A fundamental problem with this policy is that it is not clear or directive on what constitutes a “quality urban environment”. There is no supporting definition of “quality urban environment”, which could promote recognition of the many elements that are internationally recognised as contributing to quality urban environments, e.g. as reflected in the NZ Urban Design Protocol, or Statistics NZ measures of quality and liveability. ‘Quality’ can be also be context and location specific.</li> <li>• There are many factors at play outside of urban development that influence all of these desired outcomes. How much of an impact will urban development have on the labour force and innovation?</li> <li>• The policy as it stands only sets out some of the principal elements of how well-being can be achieved. However some elements of wellbeing such as health, education, safety, improvements in environmental quality, and identity are completely ignored.</li> <li>• While O2 is necessarily high level, it needs more careful wording and should be backed up by guidance and references on what constitutes a “quality urban environment”. Currently it would be easy for almost any developer to argue that their development meets (a) – (d).</li> <li>• It is unclear what (b) means. Economies of scale may or may not be spatially expressed.</li> <li>• The council supports the requirement in (c) to use “land, energy and infrastructure efficiently” as it is one of the strongest links back to RMA principles.</li> <li>• MfE guidance on ‘quality’ urban environments, in particular on medium density housing (2012), needs to be updated.</li> </ul>
<p>O3: To enable development in locations and in ways that maximise its positive and minimise its negative impact on, quality urban environments.</p>	<ul style="list-style-type: none"> <li>• Applies to all urban environments.</li> <li>• Applies immediately</li> <li>• New objective</li> </ul>	<ul style="list-style-type: none"> <li>• This objective could be deleted as it is unclear what the issue is. O2 in a much clearer form could suffice.</li> <li>• Part 2 of the RMA already addresses this. If the intention is to ensure development contributes to a quality urban environment, then this should be stated (though the document would need to be clearer about what constitutes a quality urban environment).</li> </ul>

		<ul style="list-style-type: none"> <li>• In many cases existing communities want character and amenity to remain, or be taken into consideration when densities are increasing. This issue needs to be more explicitly considered in this document and in the proposed objectives and policies. Under section 45(1) of the RMA, NPSs have to be relevant to achieving the purpose of section 5, and case law indicates that section 5 includes a consideration of the scale and significance of competing considerations.</li> </ul>
<p>P2A: When making planning decisions that affect urban development, and the way and rate at which development capacity is provided, local authorities must have particular regard to:</p> <p>a) enabling a range of dwelling types and locations, working environments and business locations</p> <p>b) limiting as much as possible adverse impacts on the competitive operation of land and development markets. When making decisions on consent applications that affect urban development, and the way and rate at which development capacity is taken up, decision-makers must have regard to the need, consistent with this NPS, to:</p> <p>c) provide a range of dwelling types and locations, working environments and business locations</p> <p>d) limit as much as possible the adverse impacts on the competitive operation of land and development markets.</p>	<ul style="list-style-type: none"> <li>• Applies to all urban environments</li> <li>• Applies immediately</li> <li>• Amended NPS-UDC 2016 policy PA3</li> </ul>	<ul style="list-style-type: none"> <li>• The meaning of this policy is unclear e.g. what is a “range of working environments”?</li> <li>• The second part of the policy, around directly applying the NPS in making decisions on consent applications, is inappropriate. NPSs have effect through the hierarchy of planning documents, rather than acting as a final check on a decision as to whether or not to grant consent. The FDS is the right process for ensuring a range of business location is provided, and should not be undermined by opportunistic and unplanned urban forms, without regard to the broader land use and infrastructure strategy. This would be a loophole which would be certain to be exploited and will open the door for arguments on many consents as to the right balance between intensification and greenfield development.</li> <li>• It is more appropriate for the FDS and District Plan reviews to address any issues arising from “take-up rates” and sufficiency of the “range of dwelling types and locations”. Sufficiency of urban development is not a matter that should be addressed through ad hoc resource consent applications. This could lead to perverse outcomes such as poor integration of land use and infrastructure, and incremental urban creep, which over time could undermine the core planning principles of Greater Christchurch’s FDS (Our Space) and the Christchurch District Plan.</li> </ul>

<p>P2B: When making or updating policies, plans and strategies, local authorities must have particular regard to:</p> <p>a) the positive impacts of urban development to contribute to a quality urban environment as described in O2</p> <p>b) the benefits and costs of urban development at national, inter-regional, regional and district scale, as well as locally.</p> <p>When making decisions on consent applications, decision-makers must have regard to:</p> <p>c) the positive impacts of urban development to contribute to a quality urban environment as described in O2 and</p> <p>d) the benefits and costs of urban development at national, inter-regional, regional and district scale, as well as locally.</p>	<ul style="list-style-type: none"> <li>• Applies to all urban environments</li> <li>• Applies immediately</li> <li>• Amended NPS-UDC 2016 policy PA4</li> </ul>	<ul style="list-style-type: none"> <li>• This policy reflects all the issues outlined above in respect of Objective O3. Without a clear articulation of what a “quality urban environment” is, it cannot be expected that the “positive impacts” of urban development will be able to be recognised.</li> <li>• As this policy is currently written, an increased rating base and/or Development Contributions resulting from any development, if applied appropriately, could lead to the regeneration or improvement of existing urban areas, and thereby contribute to a quality urban environment. The policy and any supporting guidance needs to be specific about what constitutes “positive impacts” and provide examples of how these matters can be had “particular regard to” in our plans.</li> <li>• With regard to (b), Councils are already required to evaluate alternatives and assess costs and benefits under section 32 of the RMA when considering urban growth and development through District Plan reviews and plan changes, and through Regional Policy Statement reviews.</li> <li>• Why should a District Council prepare a cost benefit assessment that extends to considering national or even regional growth? This would go beyond the functions of territorial authorities under section 31 of the Act and would contradict section 31(1)(aa), which limits consideration of development capacity of housing and development land to the expected demands of that district.</li> <li>• This policy says nothing about what an appropriate planning and policy response should be if costs are identified (urban development will almost always bring some costs), or if costs exceed benefits.</li> <li>• Rather than (b), there could be more value in looking at the cost to cities of different development scenarios e.g. intensification vs. greenfield vs. brownfield. Where is it going to be most cost efficient to focus growth, e.g. from an infrastructure point of view?</li> <li>• The second part of this policy could have the same unintentional outcomes as set out in the comments above on P2A. Also the contents of most of (d) would have no bearing on consent applications; certainly the benefits and costs of urban development at a national and inter-regional scale are not something consent planners would assess.</li> </ul>
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### Amenity values in urban environments (p.29)

<p>O4: Urban environments provide for the diverse and changing amenity values of individuals and communities.</p>	<ul style="list-style-type: none"> <li>• Applies to all urban environments</li> <li>• Applies immediately</li> <li>• New objective</li> </ul>	<ul style="list-style-type: none"> <li>• Not all urban environments need to feel, look and function the same. Some areas may either not be needed or preferred locations for development or redevelopment, i.e. they may not be near public transport routes, employment areas, community facilities, or may be areas of special character.</li> <li>• Successful cities are not all about density, rather about a mix of densities that complement each other i.e. more intensively developed areas interspersed with areas of larger sites and/or providing open space and trees.</li> <li>• O4 could be amended to: Urban environments provide for the diverse <del>and changing</del> amenity values of individuals and communities <u>and positive changes to those amenity values.</u></li> <li>• There needs to be a discussion of how amenity values which change over time can be squared up with the RMA definition of amenity values, which does not include any suggestion that this could occur.</li> </ul>
<p>P3A: In making planning and consent decisions, decision-makers must recognise that amenity values: a) vary among individuals and communities b) change over time.</p>	<ul style="list-style-type: none"> <li>• Applies to all urban environments</li> <li>• Applies immediately</li> <li>• New policy</li> </ul>	<ul style="list-style-type: none"> <li>• What is the purpose of this policy? If it is to indicate that change is required in some parts of urban areas away from current character and function, to achieve higher-order objectives such as consolidation, then this should be stated. This policy could be mixing up amenity and liveability, and it should also be considered against the NZ Urban Design Protocol.</li> <li>• Not all communities and individuals want a change in amenity. This policy is likely to be unpopular with the public, and may lead to further disengagement of the public from planning processes. Disengagement and a feeling of disenfranchisement is already evident in Christchurch both with the public and local politicians as a result of the recent fast track District Plan process, and the Greater Christchurch Regeneration Act.</li> <li>• It is worth noting that while amenity values may change over time, built form may not, e.g. villas being renovated and repaired in areas while density around them increases.</li> <li>• P3A as currently written will not assist in achieving the involvement of diverse communities in the planning process (text above the policy).</li> </ul>



		<ul style="list-style-type: none"> <li>P3A could be improved with the following addition:  <u>c) can change positively or negatively. Decision-makers should seek to promote positive change in amenity values, for the widest possible benefit to communities and future generations.</u> </li> </ul>
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### Enabling opportunities for development (p.30)

O5: To ensure local authority policies, plans and strategies enable enough opportunities for development to meet diverse demands for housing and business land	<ul style="list-style-type: none"> <li>Applies to all urban environments</li> <li>Applies immediately</li> <li>New objective based on NPS-UDC 2016 objective OA2</li> </ul>	<ul style="list-style-type: none"> <li>“Local authority plans’ is not defined and is unclear. For example it could mean that Regional Councils have to undertake what are currently District Council functions under the current NPS on UDC.</li> </ul>
<p>P4A: Local authorities must ensure at all times their plans enable at least enough development capacity that is feasible and likely to be taken up to meet the demand for dwellings (in terms of location, typology and price) and business land (in terms of location, floor area and extent of land) over the short, medium and long term.</p> <p>A local authority meets these obligations by ensuring:</p> <p>a) Short term – that the development capacity is enabled by resource management plans and serviced with development infrastructure</p> <p>b) Medium term – that the development capacity is enabled by resource management plans and either:</p> <p>i. is serviced with development infrastructure, or</p> <p>ii. the funding for the development infrastructure required to service that development capacity</p>	<ul style="list-style-type: none"> <li>Applies to all urban environments</li> <li>Applies immediately</li> <li>Amended NPS-UDC 2016 policy PA1</li> </ul>	<ul style="list-style-type: none"> <li>A number of elements to this policy are unclear. How is “likely to be taken up” going to be measured? Was the approach taken in Christchurch City Council’s last HCA appropriate? Should we be using average take-up rates over two, five or ten years to assess sufficiency? Is just extrapolating past take-up adequate to determine future “likelihoods of take-up”? We do not consider it likely to be adequate because, for example, investment in rapid transport corridors or changing school catchments could, over time, significantly change take-up rates for particular locations.</li> <li>This presents no solution to the difficult issues of feasibility already experienced with the current NPS. Land supply is only one factor in the delivery of development/development feasibility.</li> <li>There is a typo in P4A(c), which is currently shown as (a). To undertake this robustly for the long term is a resource hungry undertaking.</li> <li>See previous comments about the cost of development potentially being driven up by the need to provide infrastructure for growth over and above what is likely to eventuate.</li> </ul>

<p>must be identified in a Long Term Plan required under the Local Government Act</p> <p>c) Long term – that:</p> <p>i. the development capacity is identified in all relevant plans and strategies (including the FDS)</p> <p>ii. the development infrastructure required to service it is identified in the relevant Infrastructure Strategy required under the Local Government Act 2002.</p>		
<p>P4B: As soon as a local authority determines that it cannot provide the required development capacity, it must notify the Minister.</p>	<ul style="list-style-type: none"> <li>• Applies to all urban environments</li> <li>• Applies immediately</li> <li>• Amended NPS-UDC 2016 policy PA1</li> </ul>	<ul style="list-style-type: none"> <li>• In itself this policy achieves nothing that cannot already be achieved by ensuring that at all times there is sufficient capacity, as required in the current NPS. If an actual shortage is allowed to develop, this would indicate a serious issue with current District Plan or other Council monitoring processes, or with implementation of the current NPS. Also, it is unnecessary to notify the Minister if Council is already committed to remedying a potential shortage of development capacity in the medium or long term, e.g. by initiating plan changes to rezone more land.</li> <li>• The Development Capacity under this policy should not include the infrastructure needed to provide for the 20%/15% buffers. Councils cannot fund, or include in business cases for infrastructure funding submitted to Central Government, the 20%/15% additional buffers above growth projections.</li> <li>• P4B could be amended to:  <b><u>As soon as If</u></b> a local authority determines that it cannot provide the required development capacity <b><u>in the short term (excluding infrastructure capacity for the buffers), and cannot remedy a potential shortage of the required development capacity in the medium or long term</u></b>, it must notify the Minister.</li> </ul>
<p>P4C: In providing development capacity, a local authority must be satisfied that the other infrastructure required to support urban development is, or is likely to be, available.</p>	<ul style="list-style-type: none"> <li>• Applies to all urban environments</li> <li>• Applies immediately</li> </ul>	<ul style="list-style-type: none"> <li>• While this is a desirable situation and the adequacy of other infrastructure can be broadly assessed, councils do not have control over infrastructure provided by other agencies, e.g. the timing of provision of a new school by the Ministry of Education.</li> </ul>

	<ul style="list-style-type: none"> <li>• Amended NPS-UDC 2016 policy PA1</li> </ul>	<ul style="list-style-type: none"> <li>• It is not clear that providers of other infrastructure such as the Ministry of Education and Orion will be using the same development projections as the Council, even though we supply them with the population growth information that they use for their planning.</li> <li>• Will the other government departments and infrastructure providers also be including the 20%/15% additional buffers above growth projections, and provide additional surplus infrastructure to satisfy them? Is including additional surplus infrastructure to satisfy the 20%/15% additional buffers, a whole of Government approach?</li> <li>• This policy does not clearly indicate what should happen if other infrastructure is not available when there is an area that would otherwise be suitable for development.</li> </ul>
<p>P4D: Every local authority must set bottom lines for the total amount of development capacity it must provide to meet the demand (as determined under the most recent HBA) for dwellings.</p> <p>Bottom lines must:</p> <p>a) be set for both the medium term and the long term</p> <p>b) be reviewed every three years.</p>	<ul style="list-style-type: none"> <li>• Applies to major urban centres</li> <li>• Inserted into plans within 12 months of HBA being completed</li> <li>• Amended NPS-UDC 2016 policies PC5-PC11</li> </ul>	<ul style="list-style-type: none"> <li>• It is not clear why this policy has changed from the current terminology of housing “targets” to “bottom lines”. If this is to address business land as well as housing land this should be made clear, and the term “bottom lines” should be defined. It seems that they include the additional margins specified in AP3 and AP12, but this is not clear.</li> <li>• Setting a “bottom line”, without a maximum will make it difficult to balance the conflicting aspects of the NPS-UD and the NPS on Highly Productive Land (HPL). The NPS-HPL requires that highly productive land is protected, but recognises that it should not be a prohibition on development on HPL. Therefore in cities surrounded by HPL, like Christchurch, there will need to be a balance struck between protecting HPL and providing for urban development under the NPS-UD. With only a bottom line being set and no maximum, there is a risk that there is no limit to the amount of HPL that could be compromised.</li> <li>• The requirement for a three-yearly review should be from the first HBA, because it is possible that in order to get alignment with the LTP process, the next housing targets/bottom lines might be more than 3 years away.</li> </ul>
<p>P4E: Regional authorities must incorporate a bottom line set under P4D in their regional policy statements.</p>	<ul style="list-style-type: none"> <li>• Applies to major urban centres</li> <li>• Inserted into plans within 12 months</li> </ul>	<ul style="list-style-type: none"> <li>• No change to current situation (unless to include business land)</li> </ul>

<p>Territorial authorities must incorporate an appropriate proportion of every bottom line in their district plans, as informed by the strategic guidance in the current applicable FDS. This must be done without using the process in Schedule 1.</p> <p>[But note that Schedule 1 must be used when amending a plan to give effect to the bottom lines.]</p>	<p>of HBA being completed</p> <ul style="list-style-type: none"> <li>• Amended NPS-UDC 2016 policies PC5-PC11</li> </ul>	
<p>P4F: If an HBA indicates that a bottom line in a policy or plan is inadequate in the medium or long term, the local authority must revise the bottom line and update their policy or plan accordingly</p>	<ul style="list-style-type: none"> <li>• Applies to major urban centres</li> <li>• Inserted into plans within 12 months of HBA being completed</li> <li>• Amended NPS-UDC 2016 policies PC5-PC11</li> </ul>	<ul style="list-style-type: none"> <li>• The effect of this is highly dependent on what is meant by “bottom line”</li> </ul>
<p>P4G: If an HBA or any other evidence or monitoring indicates that there is inadequate development capacity, the local authority must:</p> <ol style="list-style-type: none"> <li>consider all options (under any legislation) to enable development, such as integrated and coordinated consenting processes</li> <li>increase development capacity by changing policy statements and plans, including changes to zoning, objectives, policies, rules and spatial layers that apply in existing urban environments and greenfield areas</li> <li>if the inadequacy relates to the long term, update its FDS</li> <li>consider all other options for increasing development capacity.</li> </ol>	<ul style="list-style-type: none"> <li>• Applies to major urban centres</li> <li>• Response shall be initiated within 12 months of problem being identified</li> <li>• Amended NPS-UDC 2016 policy PC3</li> </ul>	<ul style="list-style-type: none"> <li>• It is unclear whether P4G would allow urban growth beyond the RPS Projected Infrastructure Boundary</li> <li>• We already use integrated and coordinated consenting processes (e.g. integrated subdivision and land use consents) in our Residential New Neighbourhood zone, which covers greenfield development; however this can be unpopular with developers because residential land development and building development are frequently not undertaken by the same parties.</li> <li>• Even when land is zoned and subdivision consent has been granted, the costs of constructing roads and other infrastructure mean that developers often stage the release of sections so as to control supply, potentially maintain prices and margins, and finance the next stage of their development. Council cannot compel developers who are holding land to proceed to develop it or to release it to market until they choose to do so.</li> </ul>



### Ensuring plan content provides for expected levels of development (p.34)

<p>O6: To ensure local authorities:</p> <ul style="list-style-type: none"> <li>a) make decisions on urban development based on the best available evidence</li> <li>b) respond promptly to evidence about changing demands for housing and business land</li> <li>c) identify the evidence on which decisions about urban development are made.</li> </ul>	<ul style="list-style-type: none"> <li>• Applies to all urban environments</li> <li>• Applies immediately</li> <li>• New objective</li> </ul>	<ul style="list-style-type: none"> <li>• The test of “best available evidence” should also be applied to the drafting of NPSs. It is not made clear throughout the discussion document that it has been fully informed by current local government practice.</li> <li>• Current RMA processes such as plan changes for rezonings already require section 32 evaluation reports. Plan changes are initiated as required to provide an adequate supply of land, and private plan change requests to rezone land are now possible in Christchurch since the removal of the OIC controlling the District Plan.</li> <li>• The current NPS-UDC and associated FDS have necessitated considerable resources and staff time but have not added equivalent value to existing local government land use, infrastructure planning and monitoring processes. For example Christchurch City Council already knew prior to commencing the HBA that its supply of industrial land was sufficient to cover even long term needs without the need to rezone additional industrial land. The recent District Plan review had carefully considered intensification and greenfield development and had ensured that the supply of residential land was adequate for the short, medium and long term periods.</li> </ul>
<p>P5A: District plans must include, for each zone in an urban area, a zone description that describes the expected types and nature of development, [including expected levels of amenity], consistent with growth identified in the FDS.</p>	<ul style="list-style-type: none"> <li>• Applies to major urban centres</li> <li>• Applies immediately</li> <li>• Amended NPS-UDC 2016 objective OC2</li> </ul>	<ul style="list-style-type: none"> <li>• We understand that the intention is that councils monitor whether the specified type of development is occurring and respond if it is not. This is problematic, not least because even if we are very enabling, we cannot compel the market to respond and deliver diversity. See comments on P5C.</li> <li>• All six major urban centres already include zone descriptions in their plans. What the NPS-UD is seeking to achieve with this policy is already accomplished by zone objectives and policies for these plans. This new proposed policy does not make it clear whether these existing zone descriptions must be amended to match the ones in the National Planning Standards, although judging by the text preceding the policy, this could be the intention.</li> <li>• During the consultation on the Planning Standards, Christchurch City Council submitted in opposition to these zone descriptions being given</li> </ul>

		<p>statutory weight, because many of the zone descriptions are vague, not fit for purpose, and contrary to local strategic objectives. In some cases, giving statutory weight to the descriptions will work against the stated purpose of the NPS-UD itself e.g. by making it easier to use residentially zoned land for non-residential activities.</p> <ul style="list-style-type: none"> <li>• For example, the zone description for the <i>General residential</i> zone is: “Areas used predominantly for residential activities with a mix of building types, and other compatible activities.” Compared with the more specific and directive objectives in the current Christchurch District Plan, this zone description makes it easy for commercial developers or operators to argue that they should be permitted in residential zones as long as the zone is still “predominantly” residential.</li> <li>• Other zone descriptions are equally problematic. For example, the zone descriptions for the <i>General rural</i> and <i>Rural production</i> zones enable “associated rural industry” as opposed to “ancillary”. This means that any industrial activity with any connection to rural industry (e.g. canneries, timber mills, meat processing plants, tractor tyre factories) can anticipate being able to locate in rural zones, including in zones intended to protect versatile soils.</li> <li>• The zone descriptions for the <i>General Industrial</i> zone, <i>Mixed use</i> zone and <i>Airport</i> zone do not enable strategic directions to manage retail or office distribution outside of commercial centres.</li> <li>• Policy P5A is proposed to apply to major urban centres “immediately” whereas Christchurch City Council is not required to implement the National Planning Standards for another seven years and is not anticipating doing this ahead of its next District Plan review.</li> <li>• To be clear, the zones in the Planning Standards do not align with the zones in our current District Plan. A number of zone descriptions will be difficult to implement in the context of the Canterbury Regional Policy Statement, which includes policies requiring the avoidance of urban activities outside of the identified urban area. A national direction to implement the zone descriptions in the Planning Standards “immediately” would undermine the</li> </ul>
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		<p>strategic objectives in the current Plan in addition to being inconsistent with the RPS.</p> <ul style="list-style-type: none"> <li>• The Council also strongly recommends that the zone descriptions in the National Planning Standards be revised urgently if there is any intention to ever give them statutory weight. In the Council's view, they do not represent best planning practice.</li> <li>• We understand that this is why, in part, the Ministry removed the requirement to include the zone descriptions when the first set of National Planning Standards was gazetted.</li> </ul>
<p>P5B: Territorial authorities must:</p> <p>a) make an assessment to ensure the objectives, policies, rules, and assessment criteria set out in district plans are individually and collectively consistent with the expected development for each zone as described in the zone description</p> <p>b) enable the development of the zone to occur as described in the plan</p> <p>c) monitor and report on whether development is occurring as described in the plan as a component of section 35 efficiency and effectiveness monitoring.</p>	<ul style="list-style-type: none"> <li>• Applies to major urban centres</li> <li>• Applies at next plan review or when implementing the planning standards</li> <li>• New policy</li> </ul>	<ul style="list-style-type: none"> <li>• It would be simpler, more cost effective and more useful to monitor whether or not specific housing development targets in the policy or plan are being met as opposed to monitoring all development and then assessing whether or not it is consistent with relatively vague zone descriptions such as "predominantly residential", "predominantly industrial" etc.</li> <li>• There would be significant costs associated with this type of monitoring, especially for major urban centres where there are potentially thousands of vacant sites or sites being developed in any given year. It is very unlikely that the outcome of that monitoring would show that development was not consistent with these descriptions.</li> <li>• It would be more useful to require the HBA to identify specific development targets (i.e. X number of new dwellings; Y% of new dwellings at a specified density; Z% of new development being infill development, etc.) and to integrate these into the objectives and policies of the relevant plans and policy statements.</li> </ul>
<p>P5C: If monitoring indicates that development capacity is not being taken up to achieve the development expected in a zone, the local authority must undertake a review to understand why, and:</p> <p>a) change relevant objectives, policies, rules and assessment criteria through a plan change to the</p>	<ul style="list-style-type: none"> <li>• Applies to major urban centres</li> <li>• Applies immediately</li> <li>• New policy</li> </ul>	<ul style="list-style-type: none"> <li>• This policy seems to assume that the reason available zoned land isn't always taken up is because of planning rules. In Christchurch there are very liberal planning rules and not all opportunities are being taken up. Other factors have a major influence and need to be considered.</li> <li>• It would be more useful for central government to first establish what really drives housing markets, and secondly implement appropriate government intervention to resolve the issues identified. Housing markets are driven by a multitude of factors other than planning (particularly when as in</li> </ul>

<p>extent needed to achieve the development expected, and/or</p> <p>b) identify any constraints outside their resource management plans to achieving the expected development for the zone.</p>		<p>Christchurch there is in fact no shortage of residential or business land), including fiscal and monetary policy, immigration policy, the nature of the construction industry in New Zealand, supply chain issues, etc.</p> <ul style="list-style-type: none"> <li>• Policy P5C would require development targets to be zone-based. As long as we are meeting the District-wide targets for new dwellings and other monitoring indicates an acceptable level of amenity, it may not matter which zone the take-up of development capacity is occurring in, and if it does, this is essentially a local not national issue. It should not be necessary to undertake a costly plan change process because, for example, more development is occurring in medium density suburban zones as opposed to specified greenfields areas than was anticipated.</li> <li>• When given a choice and affordability isn't an issue, we know that preferences around where people choose to live are largely driven by lifestyle preferences – e.g. "I enjoy living near the hills", and preference drives behaviour. We do not believe that changing Plan provisions will change this.</li> <li>• P5C(b) could be amended to: Identify <b>and address</b> any constraints, outside their resource management plans <b>and over which it has control</b>, to achieving the expected development for <b><u>the zone broad zone categories (eg residential, industrial, commercial and mixed use zones)</u></b>.</li> </ul>
<p>P5D: When making planning decisions that affect the development of urban environments, local authorities <b>[should? must?]</b> demonstrate analysis that includes:</p> <p>a) a clear articulation of the resource management matters being managed</p> <p>b) an assessment of the costs and benefits of different options for urban development and their contribution to achieving a quality urban environment (as described in Objective 1)</p>	<ul style="list-style-type: none"> <li>• Applies to major urban centres</li> <li>• Applies immediately</li> <li>• New policy</li> </ul>	<ul style="list-style-type: none"> <li>• There appears to be a word missing in the draft policy (see potential insertion)</li> <li>• This policy does not add anything which is not already required in section 32 assessments for district plan reviews and plan changes, and in HBAs and FDSs. We suggest the policy is deleted.</li> <li>• Christchurch City Council already has a Strategic Objective in its District Plan, Objective 3.3.2, which includes "setting objectives and policies that clearly state the outcomes intended".</li> <li>• As already noted, the policy refers to the concept of "a quality urban environment", which is very poorly articulated in this discussion document.</li> </ul>



<p>c) an assessment of the impact of different urban development options on providing enough development capacity</p> <p>d) an assessment of regulatory and non-regulatory options for contributing to a quality urban environment and providing enough development capacity</p> <p>e) an analysis of consistency with the relevant FDS</p> <p>f) demonstration that they have been informed by relevant evidence and monitoring required under this NPS.</p>		
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### Providing for intensification (p.36)

<p>O7: To provide for the benefits of urban intensification by allowing for increased density in areas where those benefits are best realised.</p>	<ul style="list-style-type: none"> <li>• Applies to all urban environments</li> <li>• Applies immediately</li> <li>• New objective</li> </ul>	<ul style="list-style-type: none"> <li>• The first part of the objective “to provide for intensification” does not explain what intensification would achieve in terms of better environmental outcomes, e.g. more people living closer to their place of employment and to the amenities and services they use on a regular basis, so that travel times are reduced and infrastructure is used efficiently. The objectives of intensification need to be made much clearer e.g. reduce urban sprawl, enable people to access services they need (not necessarily by public transport), promote urban renewal, provide a range of housing opportunities, support centres/central city.</li> <li>• The second part of the draft objective is not an objective but rather a policy or course of action (by allowing for...).</li> </ul>
<p>P6A: Enable higher-density development, especially in areas where there are one or more of the following</p> <p>a) proximity to many employment opportunities</p> <p>b) urban amenities and services are easily accessible by existing or planned active transport and public transport networks</p>	<ul style="list-style-type: none"> <li>• Applies to all urban environments</li> <li>• Plan changes to be notified within 18 months of gazetting the NPS-UD</li> </ul>	<ul style="list-style-type: none"> <li>• All major urban centres in NZ are already doing this in its entirety. The Christchurch District Plan already has policies in place that enable all of this.</li> <li>• The other NPS requirements already point in this direction i.e. assess whether there is sufficient capacity, and if not, consider all practicable options and have regard to other national guidance and respond accordingly.</li> </ul>

<p>c) high demand for housing</p> <p>d) best use can be made of existing or planned infrastructure, services and facilities.</p>	<ul style="list-style-type: none"> <li>• New policy</li> </ul>	<ul style="list-style-type: none"> <li>• It should be noted that these are not the only matters that should be the determinants of which areas are up-zoned. Christchurch has taken additional matters into account when determining where higher density development is appropriate. These include need, the presence and level of risk from natural hazards (importantly for Christchurch), and heritage/character of areas.</li> </ul>
<p>P6B: Regional councils must include the following objective into their regional policy statements: To enable residential intensification that ensures the efficient use of existing urban land, infrastructure, services and facilities.</p>	<ul style="list-style-type: none"> <li>• Applies to major urban centres</li> <li>• Applies immediately</li> <li>• New policy</li> </ul>	<ul style="list-style-type: none"> <li>• “Residential intensification” is not defined. The policy does not appear to include residential intensification within greenfield areas, because it is only referring to efficient use of “existing urban land”, rather than also to land within future development areas.</li> <li>• If what is being directed here is to make the most of the redevelopment potential of the existing urban area, such to avoid unnecessary expansion into rural areas through greenfield development, this should be stated.</li> <li>• The approach to greenfield development in this NPS is fundamentally flawed. It would be better to have a policy focused on ensuring that subdivision and land use are integrated and at a density that creates truly liveable neighbourhoods.</li> </ul>

### Options for directing intensified development (p.37)

<p>P6C Option 1: descriptive approach</p> <p>District plans must zone for higher-density residential activities within a suitable catchment area (ie, accessible by active transport modes) around frequent public transport stops and centres.</p> <p>Higher-density residential activities are those with a concentrated bulk of buildings such as terraced housing and apartments.</p>	<ul style="list-style-type: none"> <li>• Applies to major urban centres</li> <li>• Plan changes to be notified within 18 months of gazetting the NPS-UD</li> <li>• New policy</li> </ul>	<ul style="list-style-type: none"> <li>• Definitions are needed of the following terms: ‘suitable catchment’, ‘frequent’, ‘active transport modes’, ‘concentrated bulk of buildings’, and ‘centres’ (including using the word ‘commercial’), because presumably the policy is not intended include local centres.</li> <li>• Christchurch City has “Key Activity Centres” around which medium-density development (30hh/ha) is to be appropriately located, because those centres have a variety of facilities and services on offer. For high-density enabled (60hh/ha) living, this range of facilities and services would need to be more comprehensive.</li> <li>• Frequent public transport needs to be high quality public transport with dedicated routes (e.g. busway or train services). Where public transport relies on buses that stop frequently and also get stuck in traffic, it is not a high quality option.</li> </ul>
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		<ul style="list-style-type: none"> <li>• The current wording of the policy is vague and problematic – one could interpret it to mean that anywhere that has a footpath is accessible by active transport, and should be densified.</li> <li>• Such a policy needs to factor in the type of public transport and the frequency, as well as future intentions for the integration of transport and land use. A corridor with a current bus service may be suitable for a high frequency rail service once critical mass of development/population is achieved in the future, and zoning changes may need to reflect that intent now. Conversely, areas nearby with a current bus service may not need to be enabled for more density and to do so may be counter-productive to achieving critical mass of development in the first set of areas.</li> <li>• Option 1, if better articulated, would be preferable to the more prescriptive Option 2, because it would allow local interpretation in the context of that city.</li> <li>• Option 1 is also better suited to long-term planning for future transport infrastructure, and to planning for comprehensive upgrades to public environments. This includes broad planning provision for non-Council infrastructure such as schools and medical services.</li> </ul>
<p>P6C Option 2: prescriptive approach</p> <p>District plans must:</p> <p>a) zone for high-density residential activities within an 800m walkable catchment of centres and frequent public transport stops, except where evidence demonstrates intensification should not be enabled; and</p> <p>b) zone all residential and mixed use areas within 1.5 km of city centres for high-density development.</p> <p>High density is where there is a minimum overall density of 60 residential units per hectare.</p>	<ul style="list-style-type: none"> <li>• Applies to major urban centres</li> <li>• Plan changes to be notified within 18 months of gazetting the NPS-UD</li> <li>• New policy</li> </ul>	<ul style="list-style-type: none"> <li>• Option 2 is a policy reflecting a focus solely on Auckland. It is inappropriate for Christchurch and could have perverse implications.</li> <li>• The attached map gives some idea of the significant spatial implications of applying this policy to Christchurch.</li> <li>• The direction should simply be, that if it is established that there is any shortfall in residential capacity identified in an HBA, then intensification should be looked to in the first instance to address this. This policy oversimplifies the issue of housing capacity and the solution. In fact in the case of Christchurch, it is a “solution in search of a problem”.</li> <li>• The policy requires a much more nuanced approach with spatial and physical attributes mapped that are appropriate for that city/place. Quality urban places are those which also recognise the particular characteristics of a place that people identify with i.e. neighbourhood physical and social connections, heritage, character, and landscape attributes.</li> <li>• The focus in this policy is on residential density, but it really needs to be on neighbourhoods i.e. the 800m in proximity to a frequent transit stop should not be</li> </ul>

		<p>the only factor driving residential up-zoning; rather the quality of the neighbourhood (services and facilities offered, amenity etc) is a better measure.</p> <ul style="list-style-type: none"> <li>• An 800m radius at the densities proposed may not be appropriate to all centres. A more nuanced approach in Christchurch might be to provide for 400m high density catchments in the first instance, and if high quality transit is provided, a further 800m for medium density.</li> <li>• 60 hh/ha is probably not needed at all in Christchurch and some other centres. Unless significant changes are made to ensure an appropriate quality and typology of housing, the increased density expected around commercial centres (over and above the current 30 hh/ha) and within the Central City (over and above the current 50 hh/ha) could be counter-productive, and result in poor quality outcomes. The Council is only one player attempting to ensure an appropriate quality and typology of housing, and it does not have total control over outcomes.</li> <li>• 60hh/ha will simply be too high a density in some receiving environments and is hard to achieve for small-scale developers who tend to focus on one or two sites. Site-by-site development tends to deliver acceptable outcomes in the 30 to 50 hh/ha range (but not always good quality). Good development outcomes at 60hh/ha can be achieved, but do need sites of appropriate size and shape, and preferably good locations within existing urban blocks (e.g. corner sites). Ideally development at this density is best achieved with block-level site amalgamation or at least where a number of sites form a comprehensive development project. This is often difficult to achieve in the NZ context.</li> <li>• 80hh/ha is also referred to in the discussion document, so it needs to be clear what is proposed.</li> <li>• More restrictive (increased density) zoning in central areas may encourage greater take-up of lower densities in the outer suburbs or adjacent districts, particularly since transport is not a serious limitation in Christchurch. Cross-city trips to work, and satellite centre trips to work in the central city are common and not unduly time-consuming. There is good evidence that high rates of residential land take-up in adjacent districts post-earthquakes have not only been a result of the push factors of the earthquakes and land and building damage in Christchurch, but also of a strong demand for the type of low-density development (around 10-12 hh/ha) occurring in greenfield areas in Selwyn and Waimakariri Districts. If density is</li> </ul>
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		<p>increased in central areas and along key public transport corridors, it would be necessary to consider higher minimum densities in high growth greenfield areas, e.g up to 20-25hh/ha.</p> <ul style="list-style-type: none"> <li>• The wording of the policy is unclear as to whether either or both attributes cited in (a) are required, e.g. does it direct intensification along public transport routes, regardless of whether or not there is access to services within 800m? There is no assessment of the quality of the public transport service or of the walking environment.</li> <li>• With regard to within “1.5km of city centres”, a definition of ‘city centre’ is required, i.e. does this mean the geographic centre, or does it relate to the commonly-understood boundary of the city centre (in Christchurch’s case, is the distance from the Cathedral Square or the Four Avenues? This makes a great difference.</li> <li>• A blanket prescribed minimum density ignores Christchurch’s hierarchy of commercial centres, and differences in infrastructural capacity already planned for. Changes in density can only be achieved over decades and retrospectively upgrading infrastructure can be inefficient and expensive.</li> <li>• P6C could be improved as follows: District plans must: a) zone for <del>high-medium</del> density residential activities within an 800m walkable catchment of <u>metropolitan, town, or neighbourhood</u><sup>1</sup> centres and <del>/or frequent rapid</del><sup>2</sup> public transport stops, except where evidence demonstrates intensification should not be enabled <b><u>particularly in terms of the matters of national importance under section 6 of the RMA, protection of highly productive land, and the maintenance and enhancement of community amenity and character;</u></b> and b) zone all residential and mixed use areas within 1.5 km of city centre <b><u>zones</u></b><sup>1</sup> for high-density development. High density is where there is a minimum overall density of 60 residential units per hectare.</li> </ul>
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<sup>1</sup> Based on the definitions in the National Planning Standards

<sup>2</sup> Defined as rail or Bus rapid transit (segregated bus ways)

		<b><u>Medium density is where there is a minimum overall density of 30 residential units per hectare.</u></b>
<p>P6D: Territorial authorities must include the following policy in their district plans: When considering an application for a higher-density residential activity than is currently provided under this plan, the consent authority must have particular regard to whether:</p> <p>a) the site is in an area that is required under the NPS-UD to enable intensification b) the development will provide more choice of housing.</p>	<ul style="list-style-type: none"> <li>• Applies to major urban centres</li> <li>• Applies immediately</li> <li>• New policy</li> </ul>	<ul style="list-style-type: none"> <li>• S104(1)(b)(iii) of the RMA already requires TAs to have regard to National Policy Statements when considering applications. This policy is unnecessary.</li> <li>• What is meant by housing choice should be clarified. Christchurch City's District Plan is already very enabling. There are no maximum densities in Christchurch City. Densities are effectively limited in some zones by maximum heights and minimum site sizes, and other built form standards, but all of these standards are able to be exceeded by resource consent if matters of discretion can be satisfied.</li> <li>• We already have medium densities provided for in lower density areas, through the Enhanced Development Mechanism and Comprehensive Housing Redevelopment Mechanisms in the District Plan. The qualifying criteria for these mechanisms are wider than those set out in this proposed policy.</li> </ul>

### Providing for further greenfield development (p.39)

<p>Example policy: When considering a plan change that enables urban development that is not otherwise enabled in the plan, local authorities must provide for urban development when all of the following apply:</p> <p>a. Development enabled by the plan change would contribute to a quality urban environment, including access to transport choice;</p> <p>b. Development enabled by the plan change would not have adverse effects on protected areas or areas identified for restoration;</p> <p>c. Development under the plan change can occur in a way that is appropriate, safe, and resilient in the long term in respect of</p>	<ul style="list-style-type: none"> <li>• New policy</li> <li>• Would only apply to plan changes, not resource consents</li> </ul>	<ul style="list-style-type: none"> <li>• This policy is unnecessary and poorly written. Christchurch's District Plan, in combination with section 32 of the RMA, already provides for careful consideration of all of these matters through either of the Council plan change or private plan change processes.</li> <li>• There is already effectively a presumption in favour of development where overall benefits outweigh overall costs.</li> <li>• It is unwise to presume that all factors that might be relevant to consideration of the RMA merits of a plan change for rezoning for urban purposes, can be specified in advance and in one policy. District plans contain entire chapters on strategic directions for a city including objectives and policies for urban growth, and on each of the topics in a-e, and may still be deficient in their coverage.</li> <li>• What is meant by a quality urban environment; transport choice; resilient; and appropriately managed, in this context? Whether or not plan changes could be approved could not be decided by this policy. Such decisions could only be made by reference to other more specific District Plan provisions.</li> </ul>
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<p>natural hazards and the effects of natural hazards;</p> <p>d. Reverse sensitivities are appropriately managed within and adjacent to the location or locations that are the subject of the plan change;</p> <p>e. Infrastructure to enable the long-term development of the land can be provided.</p>		<ul style="list-style-type: none"> <li>• This policy ignores the requirement in the RMA and in section 32 for consideration of other higher order planning documents such as other NPSs, NESs, and regional policy statements and plans. It also ignores the need for planning decisions in Christchurch to not be inconsistent with plans under the Greater Christchurch Regeneration Act e.g. the Land Use Recovery Plan.</li> <li>• Leap frogging the urban boundary is a major issue and contrary to the planned ethos of the NPS. It could be worthwhile to consider a process of “call for sites” to co-ordinate “offers”, as is done in the UK.</li> <li>• The Policy could be improved with the following criteria added:  <u><b>Development enabled by the plan change is not located on highly productive land;</b></u>  <u><b>Development is designed to promote mode shift to public transport, and is located within 800m walking distance of a rapid public transport stop.</b></u> </li> </ul>
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### Removing minimum car parking requirements (p.42)

<p><b>P7A Option 1</b></p> <p>Local authorities must remove any district plan rule or standard that requires the provision of car parking for any activity.</p>	<ul style="list-style-type: none"> <li>• Applies to major urban centres</li> <li>• Removal of plan rules within 18 months of gazetting the NPS-UD</li> </ul>	<ul style="list-style-type: none"> <li>• It would be useful to clarify if this is intended to apply to on-site parking only or if also to off-site parking for any activity.</li> <li>• It is inaccurate to state that each site is usually required to provide for its own peak demand (p40 of the document). It is some decades since this was the case in Christchurch City. The Council has a policy, outside the Central City, of enabling a reduction in the number of car parking spaces required, subject to provisos (Policy 7.2.1.4 of the District Plan). There was also a general “reduction” in parking standards in the recent District Plan Review.</li> <li>• The Council supports the removal of all parking requirements in some circumstances as it can enable sites to be used more efficiently, e.g. the District Plan and CCC Parking Plan already set out situations where no on-site parking is required, such as in the Central City.</li> <li>• The Council is currently undertaking a process under section 71 of the Greater Christchurch Regeneration Act to remove minimum parking standards in the Lyttelton commercial centre from the District Plan. The parking regulations appear to be</li> </ul>
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		<p>discouraging the regeneration of the commercial centre due to the impracticality of meeting standards where sites are narrow and the topography is constraining.</p> <ul style="list-style-type: none"> <li>• It would also be useful to have clarity on whether councils can or should use maximums to manage parking. Post-earthquakes, developers in the Central City have often provided some on-site parking even though there is no District Plan requirement to do so, and several dedicated parking buildings have been built or rebuilt. Would carpark buildings be covered by this policy?</li> <li>• Any removal of parking requirements would need to be phased in as public transport is improved, otherwise this could cause significant congestion and safety issues in the short and medium term, with competition for limited on-street parking e.g. around new commercial areas.</li> <li>• Removing the ability to impose maximums would not support a mode shift from car use.</li> <li>• On-street parking would need to be managed efficiently for businesses and residents, given that the city is still going through a rebuild, and public transport is not yet either fast or widely patronised.</li> <li>• Some land uses require more on-site parking or parking available in the near neighbourhood than others, e.g. there is a longstanding problem with Public Hospital parking in Christchurch, both for visitors and staff. Having little or no parking available results in personal safety concerns at night time where no public transport is available, with staff having to walk reasonably long distances to and from work. Parking requirements for medical centres need to be considered carefully.</li> <li>• Removal of parking standards must not include the removal of mobility and cycle parking standards.</li> </ul>
<p><b>P7A Option 2</b></p> <p>District plans must not regulate car parking using minimum parking requirements.</p>	<ul style="list-style-type: none"> <li>• Applies to major urban centres</li> <li>• Removal of plan rules 18 months of gazetting the NPS-UD</li> <li>• New policy</li> </ul>	<ul style="list-style-type: none"> <li>• Comments as per those above. This option is not significantly different to Option 1, since most parking requirements are minimums.</li> <li>• It is unclear what “regulate” means, although in the context of District Plans it should mean rules. It would be clearer if consistent terminology was used, as regulation can also occur outside the Plan e.g. through neighbourhood parking schemes.</li> </ul>



<p><b>P7A Option 3</b></p> <p>District plans must not regulate car parking using minimum parking requirements in medium- and high-density residential, commercial and mixed use areas.</p>	<ul style="list-style-type: none"> <li>• Applies to major urban centres</li> <li>• Plan changes to be notified within 18 months of gazetting the NPS-UD</li> <li>• New policy</li> </ul>	<ul style="list-style-type: none"> <li>• Again, the use of the word “regulate” is confusing.</li> <li>• This option supports the strategic direction of the Government Policy Statement on Land Transport by supporting mode shift in medium to high density areas, where access to employment, education etc. should be easier.</li> <li>• Removing minimums in these areas would support the enhancement of urban form by the “re-use” of space. For example, implementing cycle infrastructure or planting trees within these areas will create more liveable and healthy streets. This will also encourage active travel within and into and out of these areas by integrating current land use with sustainable transport.</li> <li>• There is a hidden cost associated with an oversupply of parking. This needs to be recognised and policy and rule changes made, which this option supports. Providing too much car parking is an inefficient use of sites, reduces potential residential and commercial floor space and increases congestion.</li> <li>• This option would help support the long-term integration of land use and transport. As areas become denser, managing parking from the outset will relieve and reduce congestion in the future.</li> <li>• However, without more central government funding and support to achieve a transport mode shift and significantly better public passenger transport, the removal of parking requirements will result in negative consequences, especially in terms of parking spillover and decreased access for the disabled and service providers.</li> </ul>
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### More directive intervention to enable quality urban development

<p>Should more direct intervention using NESs or a National Planning Standard, preclude or replace certain rules in District Plans?</p> <p>Rules that could be considered:</p> <ul style="list-style-type: none"> <li>• Height or height in relation to boundary, which limit upward development</li> <li>• Density and subdivision standards, which constrain the size of properties or no. of houses per property</li> </ul>	<ul style="list-style-type: none"> <li>• New policy</li> <li>• Would only apply to plan changes, not resource consents</li> </ul>	<ul style="list-style-type: none"> <li>• Care is needed when restricting development envelopes, and attention needed to specific circumstances.</li> <li>• Low temperatures and sun angles mean that separation and access to sunlight is important in Christchurch. It may be appropriate to look at ways to manage this but removing height in relation to boundary would have adverse consequences. HIRB rules are most effective in high density areas, because of the increased development pressure creating more “conflict” between properties. They can be more about the overshadowing of people’s back gardens from the row of houses behind than from other houses in the</li> </ul>
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<ul style="list-style-type: none"> <li>• Private open space, which may not respond to the potential to leverage public or shared outdoor spaces</li> <li>• Site coverage, which limits the amount of a property that can be covered by buildings</li> <li>• Minimum floor areas/apartment sizes, which reduce the variety the market can offer.</li> <li>• Minimum lot sizes, to enable greater variety and choice in properties and houses.</li> </ul>		<p>same development (which is not a problem in the current system). This means that stating that they are most relevant for detached housing (p45 of the discussion document) is missing the point. These rules play an important role in protecting amenity.</p> <ul style="list-style-type: none"> <li>• A national direction for a minimum height in a certain areas would be draconian. For example, requiring three storeys in a previously low-density area such as in the Residential Suburban Zone in Christchurch, in which single storey houses often predominate and two storey houses are uncommon, is not the best way to increase density.</li> <li>• Minimum floor areas are almost always the result of covenants imposed by developers to ensure large houses and high house values in new subdivisions, not of local authority rules. The best way to change this situation would be to legislate to prohibit restrictive covenants on floor areas. We understand that this has been done in Australia.</li> <li>• A higher minimum density is the best way to increase housing variety in greenfield areas. This appears to be successful in Brisbane, where average densities of 20hh+ are standard even in greenfield areas.</li> <li>• Note that most medium-high density zones already allow for three storeys, but that in Christchurch they are often not built because of the cost of building, as opposed to the zoning.</li> <li>• If sufficient residential capacity is available for the short, medium and long term, it does not seem necessary to amend these rules.</li> <li>• NZ has already seen issues arise in the 1990s and 2000s when minimum liveable spaces were not provided in some developments in Auckland. While not all residential units need to have a large floor space, liveability and quality dictate a minimum room size e.g. for master bedrooms and living spaces, to enable furniture to fit in.</li> </ul>
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## Evidence for good decision making

### Using market information to make decisions (p.47)

O8: To ensure every local authority with an urban environment has a robust, comprehensive and frequently updated evidence base about its urban environments.	<ul style="list-style-type: none"> <li>• Applies to all urban environments</li> <li>• Applies immediately</li> </ul>	<ul style="list-style-type: none"> <li>• We agree that it is appropriate to monitor key indicators.</li> </ul>
P8A: Local authorities must use evidence and information about the land and development markets for dwellings and business land, and reflect this in their section 32 reports.	<ul style="list-style-type: none"> <li>• Applies to all urban environments</li> <li>• Applies immediately</li> <li>• New policy</li> </ul>	<ul style="list-style-type: none"> <li>• We agree that where appropriate, plan changes should draw on as many information sources as possible.</li> <li>• Most plan changes will be giving effect to a higher order land use strategy such as a Future Development Strategy or a Regional Policy Statement, or both, that will have already used this information to inform their development.</li> </ul>
<p>P8B: Local authorities must monitor a range of indicators, including the following, on a quarterly basis, to ensure they are well-informed about their markets for housing and business development capacity, and urban development activity and outcomes:</p> <ol style="list-style-type: none"> <li>a) prices and rents for housing, residential land, and business land by location and type, and changes in these over time</li> <li>b) the number of dwellings receiving resource or building consents relative to the growth in households</li> <li>c) the type and location of dwellings receiving resource or building consents</li> <li>d) the housing price to cost ratio</li> <li>e) indicators of housing affordability</li> <li>f) available data on business land.</li> </ol> <p>Local authorities must publish the results of their monitoring of indicators at least annually.</p>	<ul style="list-style-type: none"> <li>• Applies to all urban environments</li> <li>• Applies immediately</li> <li>• Amended NPS-UDC 2016 policy PB6</li> </ul>	<ul style="list-style-type: none"> <li>• The Council has previously argued, and continues to hold the view, that quarterly monitoring is too onerous and unnecessary, and that biannually would be sufficient to indicate trends.</li> <li>• We support the reduced requirement to publish the results of this monitoring on an annual rather than a quarterly basis.</li> </ul>

<p>P8C: Local authorities must:</p> <p>a) use information from indicators of price efficiency in their land and development market as it becomes available</p> <p>b) analyse that information to understand how well the market is functioning and how planning may affect this, and when additional development capacity might be needed</p> <p>prepare and publish a report on the analysis.</p>	<ul style="list-style-type: none"> <li>• Applies to major urban centres</li> <li>• Applies immediately</li> <li>• Amended NPS-UDC 2016 policy PB7</li> </ul>	<ul style="list-style-type: none"> <li>• There are known issues with the use of price efficiency indicators. These perpetuate a misunderstanding that higher urban land values indicate that the land market is operating inefficiently, when instead those large differences in value reflect efficient urban growth patterns<sup>3</sup></li> </ul> <p><a href="http://www.marketeconomics.co.nz/LiteratureRetrieve.aspx?ID=215762">http://www.marketeconomics.co.nz/LiteratureRetrieve.aspx?ID=215762</a></p>
<p>P8D: Local authorities must assess demand for housing and business land, and the development capacity required to meet that demand in the short, medium and long term.</p>	<ul style="list-style-type: none"> <li>• Applies to all urban environments</li> <li>• Applies in time to inform major plan changes</li> <li>• New policy</li> </ul>	<ul style="list-style-type: none"> <li>• This is already required by the existing NPS e.g. PA1, which requires an assessment of sufficiency. Sufficiency can only be assessed by looking at both demand and supply.</li> <li>• Prior to the existing NPS, Christchurch City Council already monitored the supply and take-up of zoned industrial, commercial and residential land. The key element added by the existing NPS was the need to specifically assess demand for the various time periods.</li> </ul>

<sup>3</sup> Fairgray (June 2019) Making Room from Growth – A Strategy founded on Poor Economics



## Engagement on urban planning

### Taking into account issues of concern to iwi and hapū (p.51)

O9: Urban development occurs in a way that takes into account resource management issues of concern to iwi and hapū.	<ul style="list-style-type: none"> <li>• Applies to all urban environments</li> <li>• Applies immediately</li> <li>• New objective</li> </ul>	<ul style="list-style-type: none"> <li>• In this section there is variable use of the words “issues” and “aspirations”. The objective should focus on environmental outcomes.</li> <li>• It is worth noting that the “issues” seen at Ihumatao relate to history, identity and cultural values, and that none of these are considered in this NPS in its discussion of “quality urban environments”.</li> <li>• This objective needs to be considered alongside and against objectives such as O2, which relate only to selected elements of the urban environment. A wider discussion of quality and good urban design would also assist.</li> </ul>
<p>P9A: When preparing a proposed policy statement, plan or strategy that affects how development capacity is provided for in urban environments every local authority must:</p> <ol style="list-style-type: none"> <li>a) provide iwi and hapū with opportunities to identify the resource management issues of concern to them relating to urban environments; and</li> <li>b) indicate how those issues have been or will be addressed in the proposed policy statement, plan or strategy.</li> </ol>	<ul style="list-style-type: none"> <li>• Applies to all urban environments</li> <li>• Applies immediately</li> <li>• New Policy</li> </ul>	<ul style="list-style-type: none"> <li>• Where there is an existing Iwi Management Plan (in this case the Mahaanui Iwi Management Plan 2013) Council is already required by section 74 of the RMA to take account of this IMP when preparing or changing its Plan. Schedule 1 Clause 3 reinforces this, and there is also now a duty under Schedule 1 Clause 4A, to consult again after a draft has been prepared and before notification. Therefore consultation has to, and does in the case of Christchurch City Council, occur on all plan changes and plan reviews. This includes those that affect how development capacity is provided for in urban environments, e.g. plan changes for rezonings or changes to rules to provide for more intensification; consultation has also occurred in regard to proposals under the Greater Christchurch Regeneration Act where Te Rūnanga o Ngāi Tahu is a strategic partner.</li> <li>• Under section 32 of the RMA, local authorities already have to indicate what advice concerning the proposal was received from iwi authorities under the Schedule 1 provisions and also the response to that advice.</li> <li>• In light of all these provisions, Policy 9A adds very little.</li> </ul>
P9B: When preparing a proposed policy statement, plan or strategy that affects how development capacity is provided for in urban environments every local authority	<ul style="list-style-type: none"> <li>• Applies to all urban environments</li> <li>• Applies</li> </ul>	<ul style="list-style-type: none"> <li>• As above, this will always happen anyway.</li> <li>• Christchurch City Council has a strong relationship with Mahaanui Kurataiao Ltd, a Ngāi Tahu resource and environmental management advisory company set up in 2007 by the six local Rūnanga with mana whenua rights over the Christchurch area, to represent their interests in the RMA process.</li> </ul>

<p>must:</p> <p>a) provide hapū and whānau with opportunities to identify their aspirations for urban development on whenua Māori within their rohe</p> <p>b) take into account their aspirations for urban development on whenua Māori within their rohe.</p>	<p>immediately</p> <ul style="list-style-type: none"> <li>• New Policy</li> </ul>	<ul style="list-style-type: none"> <li>• The Council worked jointly with a mana whenua working party throughout the District Plan Review process, to ensure that mana whenua interests were appropriately represented in the District Plan both in general terms and in terms of specific papakainga provisions.</li> <li>• Some of the local Rūnanga have current development aspirations for Māori land within the various parts of the papakainga zone in the District Plan, and the Council is working proactively with these Rūnanga and their representatives.</li> </ul>
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### Coordinated Planning (p.53)

<p>O10: To ensure decisions within local authorities and across local authority boundaries are coordinated and aligned with the provision of development and other infrastructure.</p>	<ul style="list-style-type: none"> <li>• Applies to all urban environments</li> <li>• Applies immediately</li> <li>• Amended NPS-UDC 2016 objective OD2</li> </ul>	<ul style="list-style-type: none"> <li>• Local authorities already coordinate with each other with regard to the provision of development and other infrastructure across local authority boundaries. For example Selwyn District Council used to send sewage from at least Prebbleton north to Christchurch City Council's sewerage reticulation system for eventual treatment at Bromley, but Selwyn District has had to develop its own separate treatment systems for its main settlements in recent years, in response to rapid growth in its District. Selwyn stills send sewage from Tai Tapu to Christchurch for treatment.</li> </ul>
<p>P10A: Local authorities that share jurisdiction over an urban environment are strongly encouraged to work together to implement this NPS, having particular regard to cooperate and agree on:</p> <p>a) the provision and location of feasible development capacity required by it; and</p> <p>b) principles and practices for partnering with iwi and hapū.</p>	<ul style="list-style-type: none"> <li>• Applies to all urban environments</li> <li>• Applies immediately</li> <li>• Amended NPS-UDC 2016 policy PD1(b)</li> </ul>	<ul style="list-style-type: none"> <li>• Christchurch City has been cooperating and working with adjoining councils on a combined subregional growth strategy since the Urban Development Strategy of 2007. This strategy was subsequently translated into the RPS, and reviewed and updated in 2016.</li> <li>• The three Councils collaborated in developing their HBAs under the existing NPS-UDC, and in producing their Future Development Strategy, Our Space, which was finalised earlier this year.</li> <li>• Each Council already has similar practices for partnering with iwi and hapū. This is made relatively straightforward by the ability to work through MKT as outlined above, as they represent and work for example with Tuahiriri, the Rūnanga with the largest "rohe" in Greater Christchurch, covering most of Waimakariri District and the flat areas of Christchurch City.</li> </ul>

		<ul style="list-style-type: none"> <li>Christchurch City Council has a Ngāi Tahu partnership team, and a Council Standing Committee on the Council/ Ngāi Tahu partnership, the Te Hononga Council- Papatipu Runanga Committee.</li> </ul>
<p>P10B: Local authorities must work with providers of development and other infrastructure to</p> <p>a) achieve integrated land use and infrastructure planning</p> <p>b) implement policies P4A and P4C.</p>	<ul style="list-style-type: none"> <li>Applies to all urban environments</li> <li>Applies immediately</li> <li>Amended NPS-UDC 2016 policy PD2</li> </ul>	<ul style="list-style-type: none"> <li>There is no change here from the existing NPS-UDC and from existing good planning practice.</li> <li>However, note the comments in response to the questions document to the effect that providers of other infrastructure have been uninterested in the existing NPS and some have chosen not to engage at all.</li> </ul>
<p>P10C: Local authorities that share jurisdiction over a major urban centre are strongly encouraged to collaborate and cooperate to agree on:</p> <p>a) the preparation or review and content of a joint HBA</p> <p>b) the specification and review of the bottom lines required under this NPS</p> <p>the development or review of a joint FDS.</p>	<ul style="list-style-type: none"> <li>Applies to major urban centres</li> <li>Applies immediately</li> <li>Amended NPS-UDC 2016 policy PD3</li> </ul>	<ul style="list-style-type: none"> <li>The Council is already fulfilling this requirement.</li> </ul>

## 8. Timing

Time	Requirements	Comments
<b>Immediately from date of gazettal</b>	<ul style="list-style-type: none"> <li>All objectives in the NPS-UD apply</li> <li>Policies on quality urban environments, amenity, enabling opportunities for development, ensuring plan content provides for expected levels of development, issues of concern to iwi and hapū, and coordinated planning apply</li> </ul>	<ul style="list-style-type: none"> <li>The important issue is not <b>when</b> objectives and policies apply, but making them more meaningful before they do.</li> <li>At present the draft NPS objectives and policies add little to the current NPS in regard to development capacity and coordinated planning, and add little to what is already occurring in local government planning and infrastructure planning, including in regard to planning for expected levels of development and working with iwi and hapū in planning processes.</li> </ul>
<b>Quarterly</b>	<ul style="list-style-type: none"> <li>Monitor housing indicators</li> </ul>	
<b>Within 18 months of</b>	<ul style="list-style-type: none"> <li>Policies on providing for intensive development apply</li> <li>Policies on removing car parking minimums apply</li> </ul>	<ul style="list-style-type: none"> <li>Council strongly opposes the 18-month timetable for imposing policies providing for intensive development. The policies need to be substantially rewritten before they would be appropriate for adoption.</li> </ul>
<b>Every 3 years</b>	<ul style="list-style-type: none"> <li>HBA policies must be undertaken in time to inform the FDS</li> <li>Policies on setting bottom lines apply (within 1 year of HBA being completed)</li> </ul>	<ul style="list-style-type: none"> <li>While removing car parking minimums has some merit, this needs to be done based on circumstances and as public transport develops, rather than being imposed from national level.</li> <li>HBAs should inform the FDS, and equally the FDS should inform the LTP, however this sequencing is unlikely to be viable at present due to the long lead-in times for preparing LTPs. See above comments on timing of HBAs/FDSs/LTPs.</li> </ul>



### Appendix 3: Policies on Housing and Business Development Capacity Assessments

Summary of the Proposals	<p>Main changes include:</p> <ul style="list-style-type: none"> <li>• Clarification of what to include in estimates of development capacity that is feasible and likely to be taken up in the short, medium and long term. These changes: <ul style="list-style-type: none"> <li>-Include development infrastructure funded or financed by a third party.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• This listing does not distinguish between network utility (bulk) infrastructure, and local infrastructure (connecting infrastructure and internal infrastructure within subdivisions), which is already normally funded by developers. This latter category of local or reticulation infrastructure is not adequately recognised or dealt with in either the existing NPS or in this proposed NPS. Just because third parties (developers) fund local infrastructure, does not mean that adequate network utility (bulk) infrastructure is available to service that local infrastructure.</li> <li>• LTPs and infrastructure strategies have to adequately provide for bulk infrastructure over a very long planning cycle of at least 30 years, where investment decisions are not reversible. Third parties would never be asked to fund these items, e.g. upgrading a downstream pump station or a wastewater treatment plant.</li> <li>• Therefore, the concept of infrastructure such as water supply and wastewater facilities being funded by third parties is already happening to the extent that this is practicable. We do not see any great potential for further developer funding, certainly not to the extent that it would influence estimates of feasible development capacity.</li> </ul>
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# National Policy Statement on Urban Development

## Discussion document

- Potential Spatial implications of proposed intensification Policy P6C Option 2

September 2019

In the discussion document on the proposed National Policy Statement on Urban Development, the following options for directing intensified development are considered:

### Options for directing intensified development

The Government is considering two options for directing intensification through district plan policies for major urban centres.

Proposed objective/policy	Notes
<p>P6C Option 1: descriptive approach</p> <p>District plans must zone for <i>higher-density residential activities</i> within a suitable catchment area (ie, accessible by active transport modes) around frequent public transport stops and centres.</p> <p><i>Higher-density residential activities</i> are those with a concentrated bulk of buildings such as terraced housing and apartments.</p>	<ul style="list-style-type: none"> <li>• Applies to major urban centres</li> <li>• Plan changes to be notified within 18 months of gazetting the NPS-UD</li> <li>• New policy</li> </ul>
<p>P6C Option 2: prescriptive approach</p> <p>District plans must:</p> <p>a) zone for <i>high-density</i> residential activities within an 800m walkable catchment of centres and frequent public transport stops, except where evidence demonstrates intensification should not be enabled; and</p> <p>b) zone all residential and mixed use areas within 1.5 km of city centres for <i>high-density</i> development.</p> <p><i>High density</i> is where there is a minimum overall density of 60 residential units per hectare.</p>	<ul style="list-style-type: none"> <li>• Applies to major urban centres</li> <li>• Plan changes to be notified within 18 months of gazetting the NPS-UD</li> <li>• New policy</li> </ul>

Both options have two components: location and density, which are not mutually exclusive.

- **Option 1** (the descriptive approach) gives more scope for local authorities to decide on location, while still giving direction on this. However, it may not be as effective at shifting the focus to higher density in these areas.
- **Option 2** (the prescriptive approach) is clearer in identifying locations. However, 800 metres is a fairly crude measure for walkable catchments, and a density descriptor of 60 dwellings per hectare may not be workable in all locations.

The potential areas that are identified by Option 2 have been mapped (as shown in the following maps) to show the potential extent of this policy. In order to undertake this mapping the following assumptions have been made, in consultation with staff from the Ministry for the Environment:

- The 800m walkable catchment has been derived using Christchurch's GIS walking network model
- Frequent public transport stops are stops on bus routes with a frequency of at least a bus every 10 – 15 minutes during the day. In Christchurch the bus routes with that frequency are the Orbiter, Blue, Orange, Purple and Yellow Lines. These routes are shown on the maps 1-4. In addition to this, map 5 also includes four more routes that are proposed in the 2018 Canterbury Regional Public Transport Plan to become frequent routes in the future.
- 1.5 km from the City Centre has been measured from the edge of the Commercial Central City Business Zone
- In terms of the requirement to be within an 800m walkable catchment of centres and frequent public transport stops, only one of these criteria needs to be met to meet this requirement.
- In terms of the requirement to be within an 800m walkable catchment of centres, a number of different options of what could be defined as a "centre" under this policy, has been mapped. Maps 2 and 3 shows 800m from all commercial centres (including local centres), Map 4 shows 800m from the Central City, Key Activity Centres and Neighbourhood Centres only. Map 6 shows the network of commercial centres in Christchurch.
- The areas mapped are the maximum areas identified by Option 2, there has not yet been consideration of the extent that there is evidence that intensification should not be enabled in any of these areas.

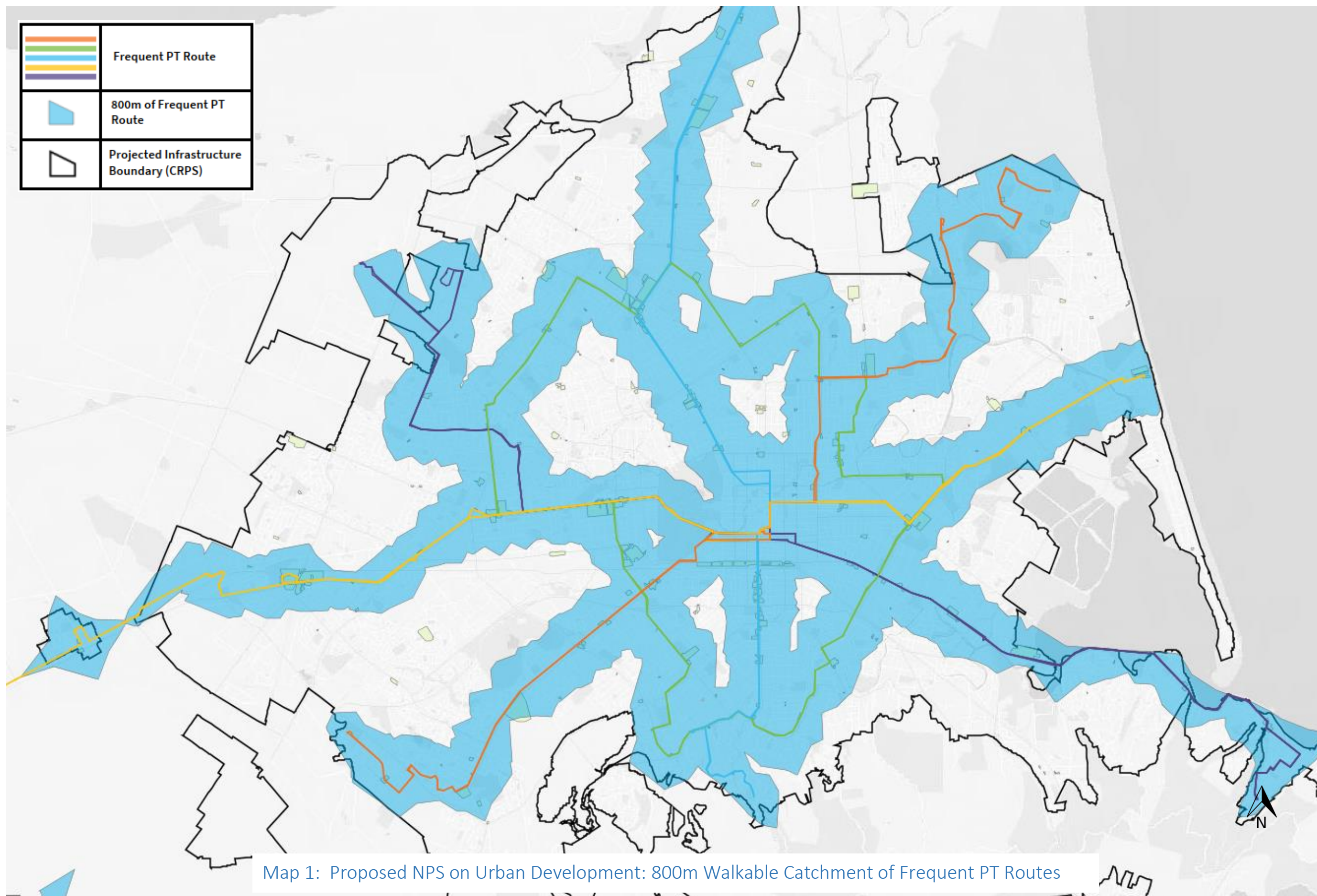
### Potential Coverage of these areas

10% of Christchurch's 'urban area' is already enabled for medium density within a walkable catchment of the central city and key activity centres within our Residential Medium Density, Residential Central City and some commercial and Residential New Neighbourhood Zones. **Together this policy approach provides more than sufficient development capacity to meet projected long term needs.**

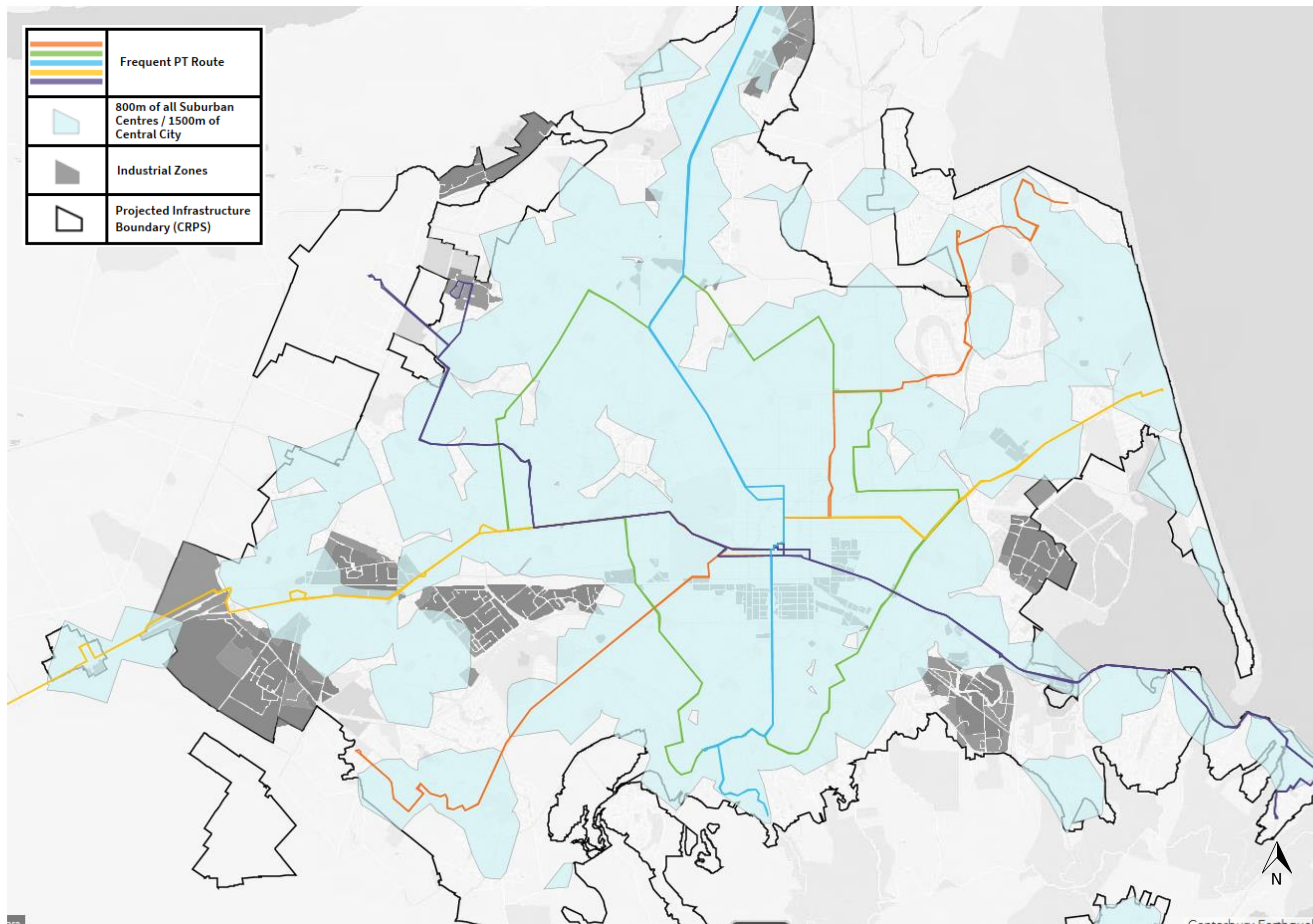
If the approach of increasing density around all centres (including local centres) as shown on Map 5 was adopted, this would increase to over 70% coverage i.e. seven times the current provision enabled in Christchurch. Such provision is neither necessary nor desirable and such dispersed growth may run counter to our other objectives of facilitating recovery of the central city and key activity centres. Further, the function of local centres is to serve a very localised walkable catchment and these centres are not intended nor appropriate as growth modes.

If the approach of increasing density just around our larger centres and the current frequent PT corridors (shown on Map 4) is adopted, this still overs over 50% of the urban area and would result in a considerable oversupply and with similar consequential effects.







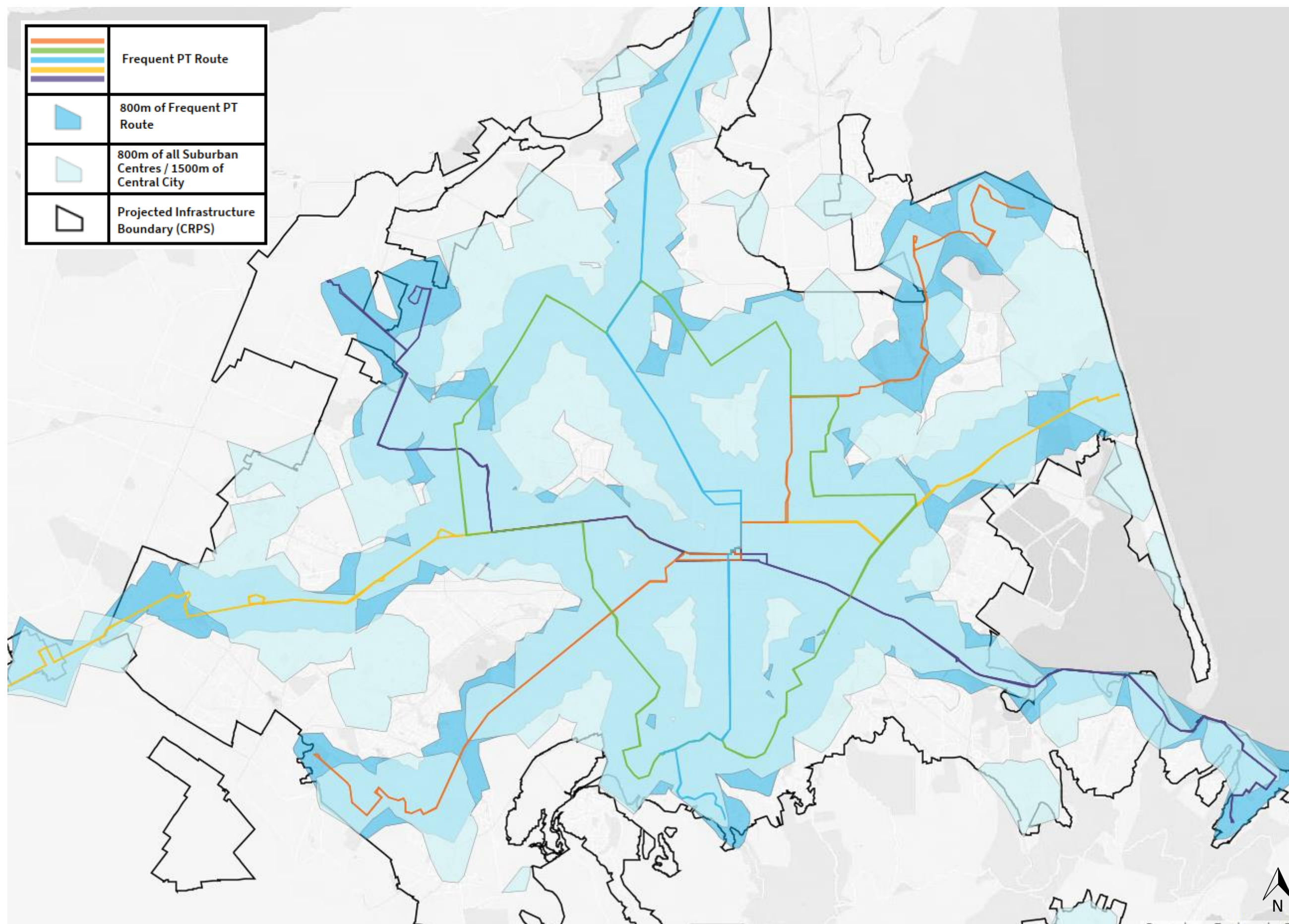


Map 2: Proposed NPS on Urban Development: 800m Walkable Catchment of all Commercial Centres (and 1.5 km Walkable Catchment of Central City)

Proportion of Urban Area identified for high density under this scenario: 60% (Proportion of residential zoned land: 75%)

NOT COUNCIL POLICY

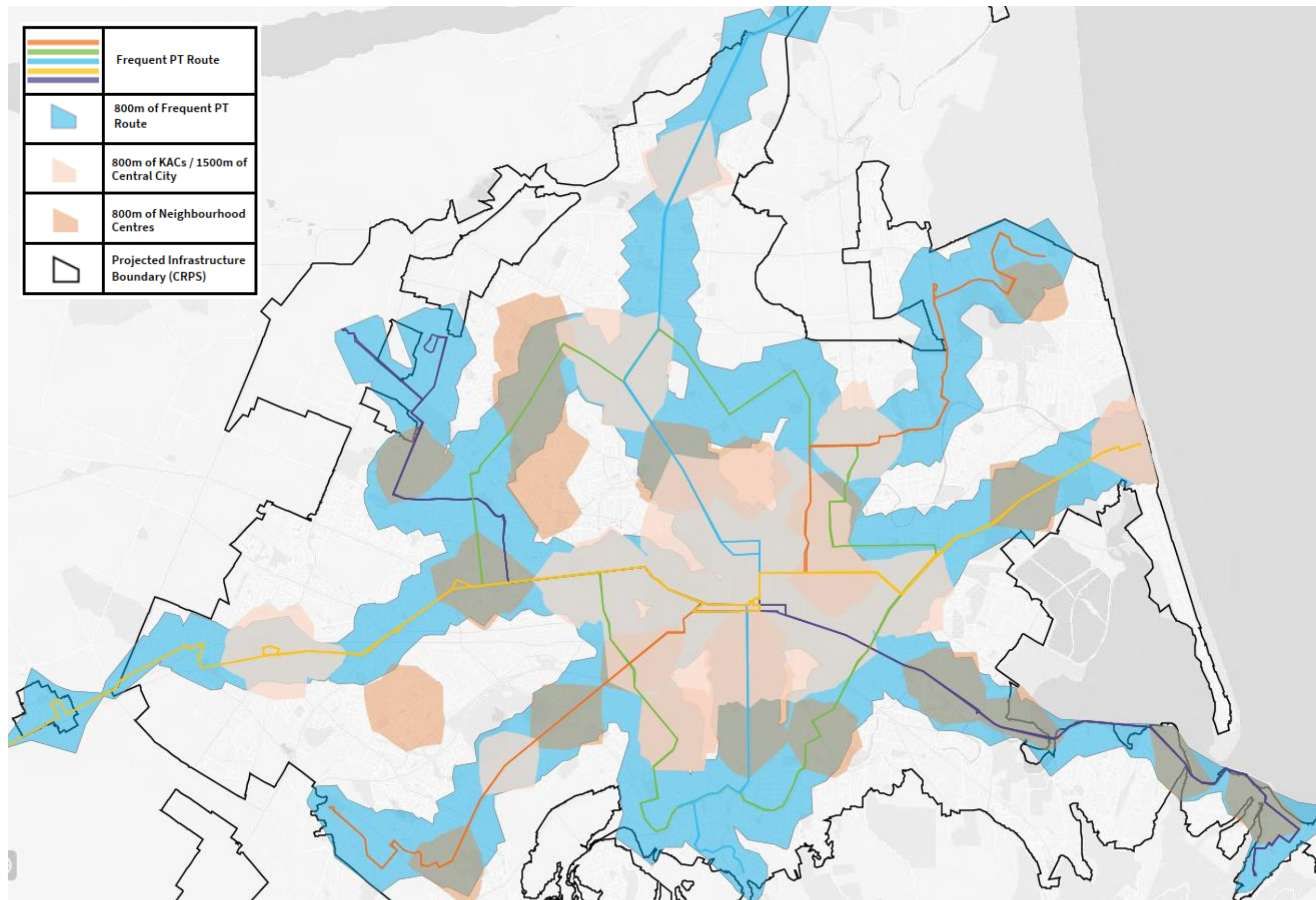




Map 3: Proposed NPS on Urban Development: Walkable Catchment of Frequent PT Routes and All Commercial Centres

Proportion of Urban Area identified for high density under this scenario: 68% (Proportion of residential zoned land: 84%)

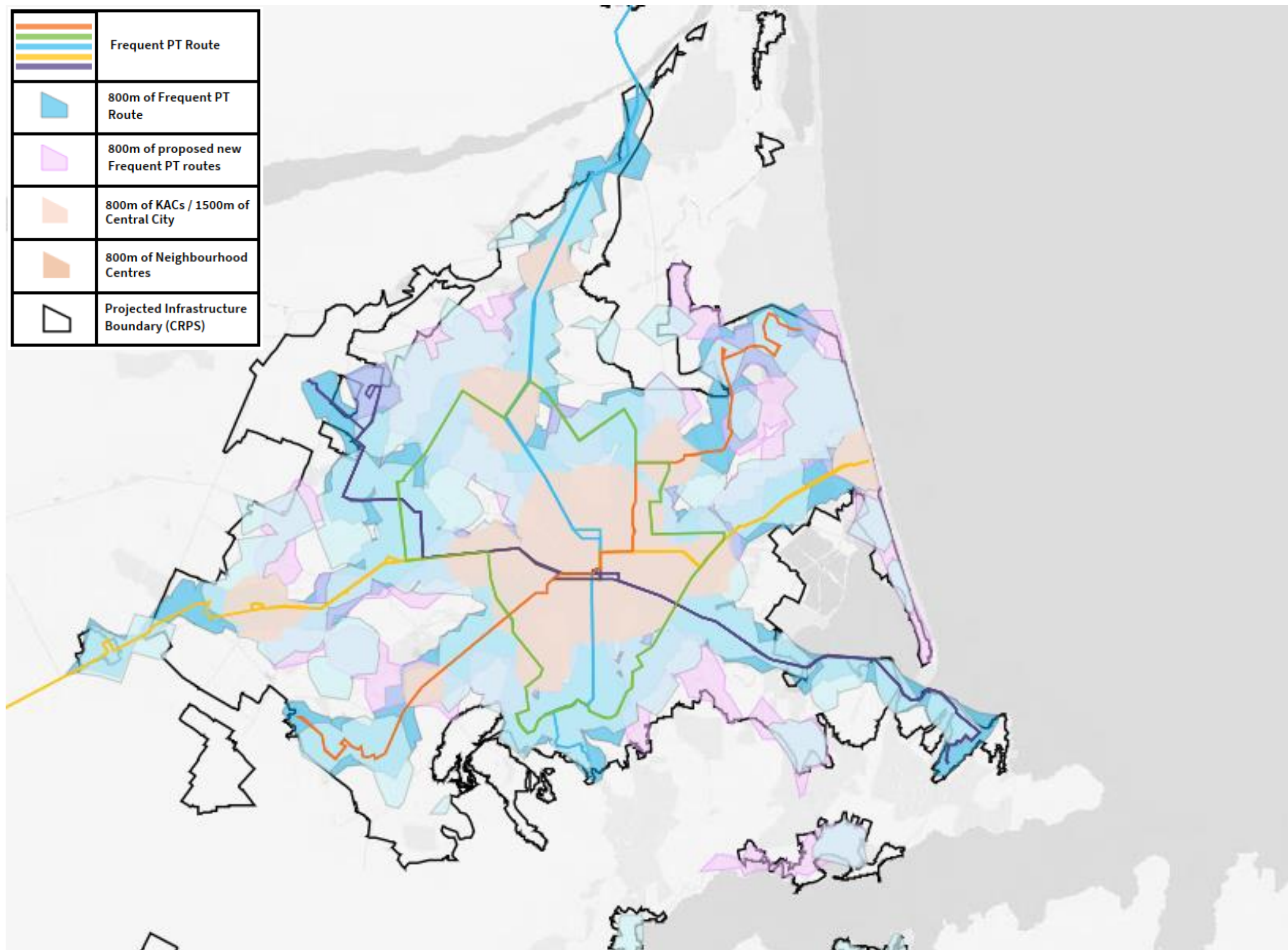




Map 4: Proposed NPS on Urban Development: Walkable Catchment of Frequent PT Routes and Central City, Key Activity Centres and Neighbourhood Centres

Proportion of Urban Area identified for high density under this scenario: 54% (Proportion of residential zoned land: 67%)

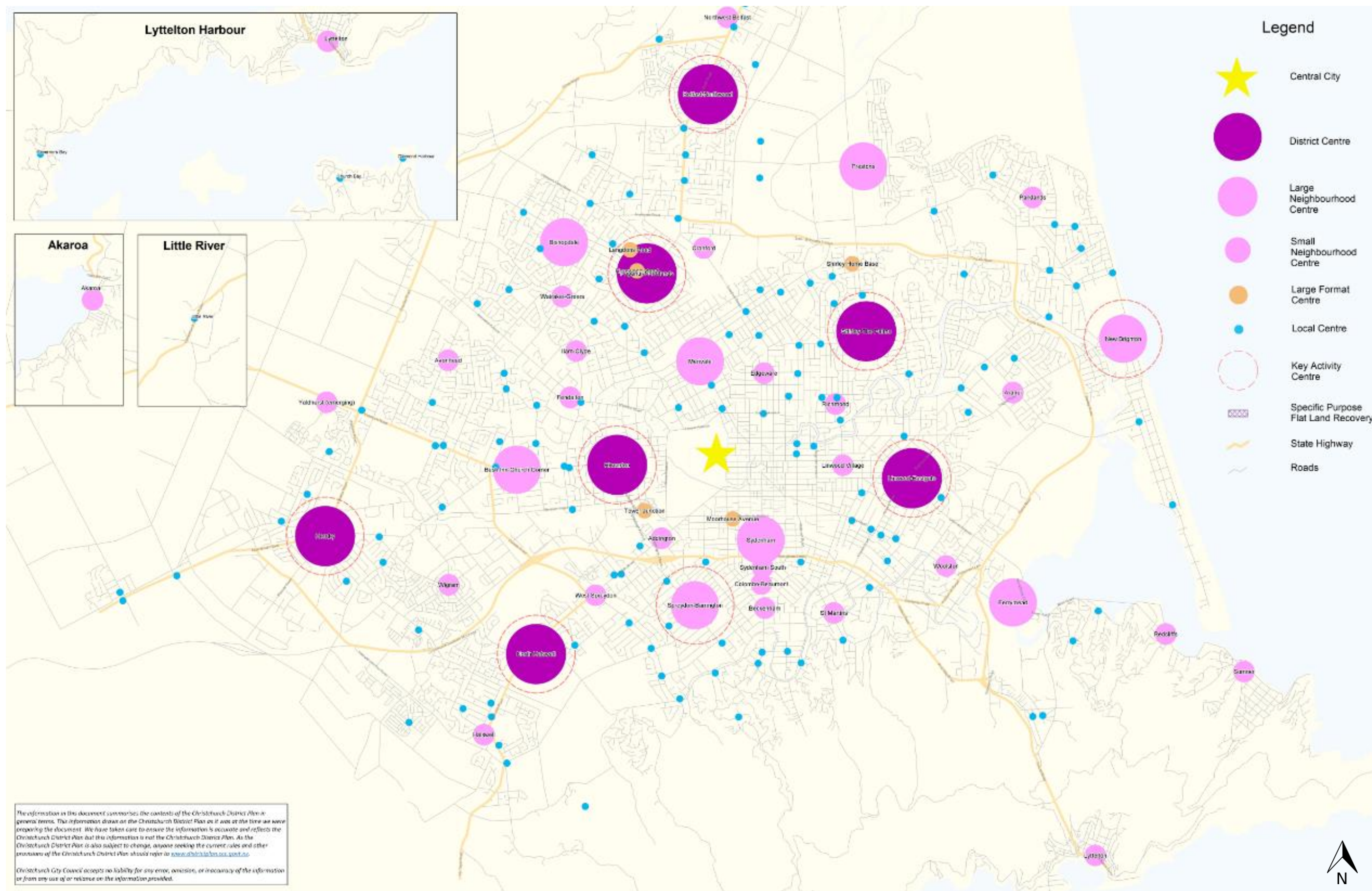




Map 5: Proposed NPS on Urban Development: Walkable Catchment of Frequent PT Routes (plus the 4 proposed new frequent routes) and All Commercial Centres

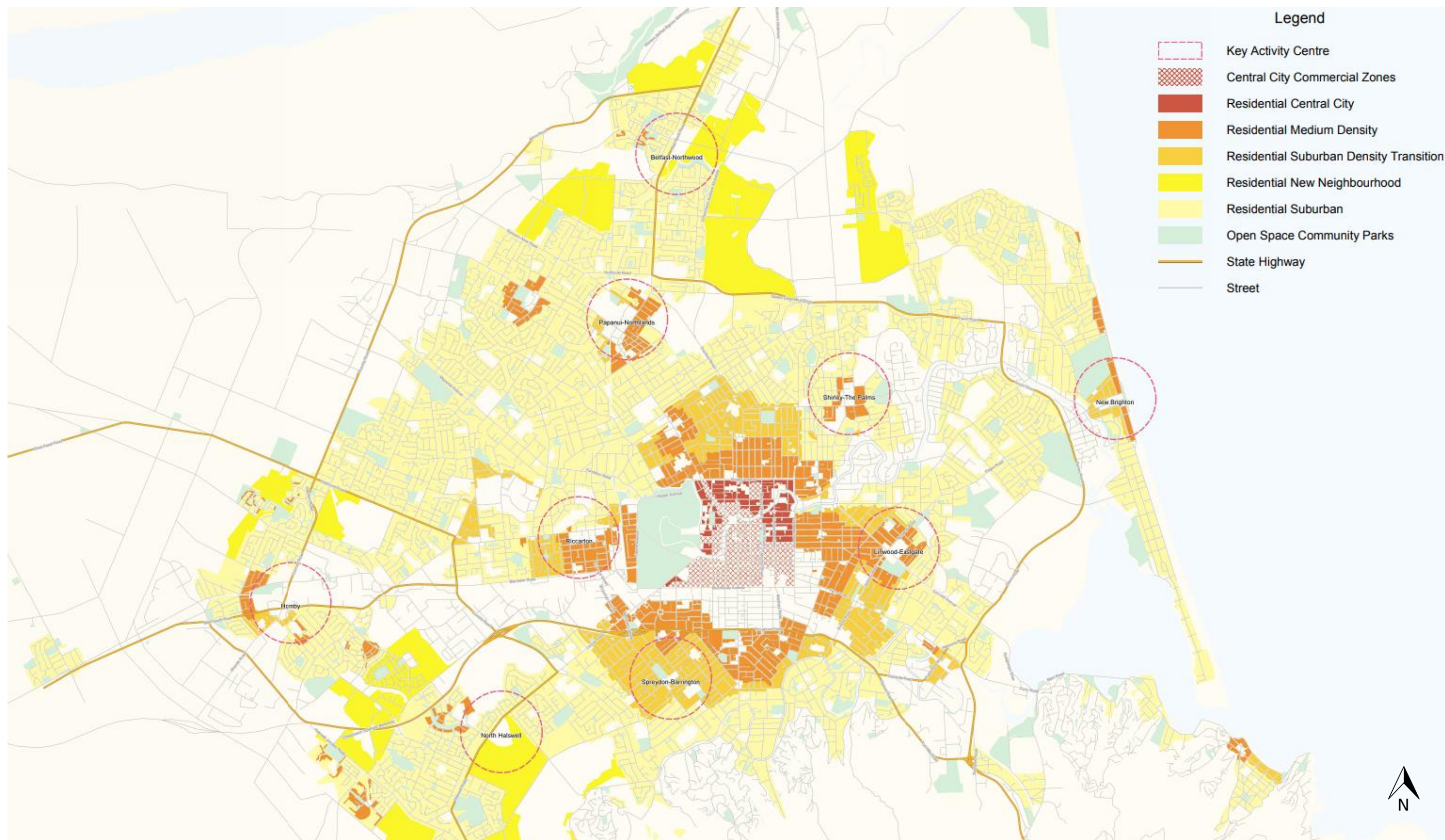
Proportion of Urban Area identified for high density under this scenario: 73% (Proportion of residential zoned land: 90%)





## Map 6: Christchurch District Plan Network of Commercial Centres





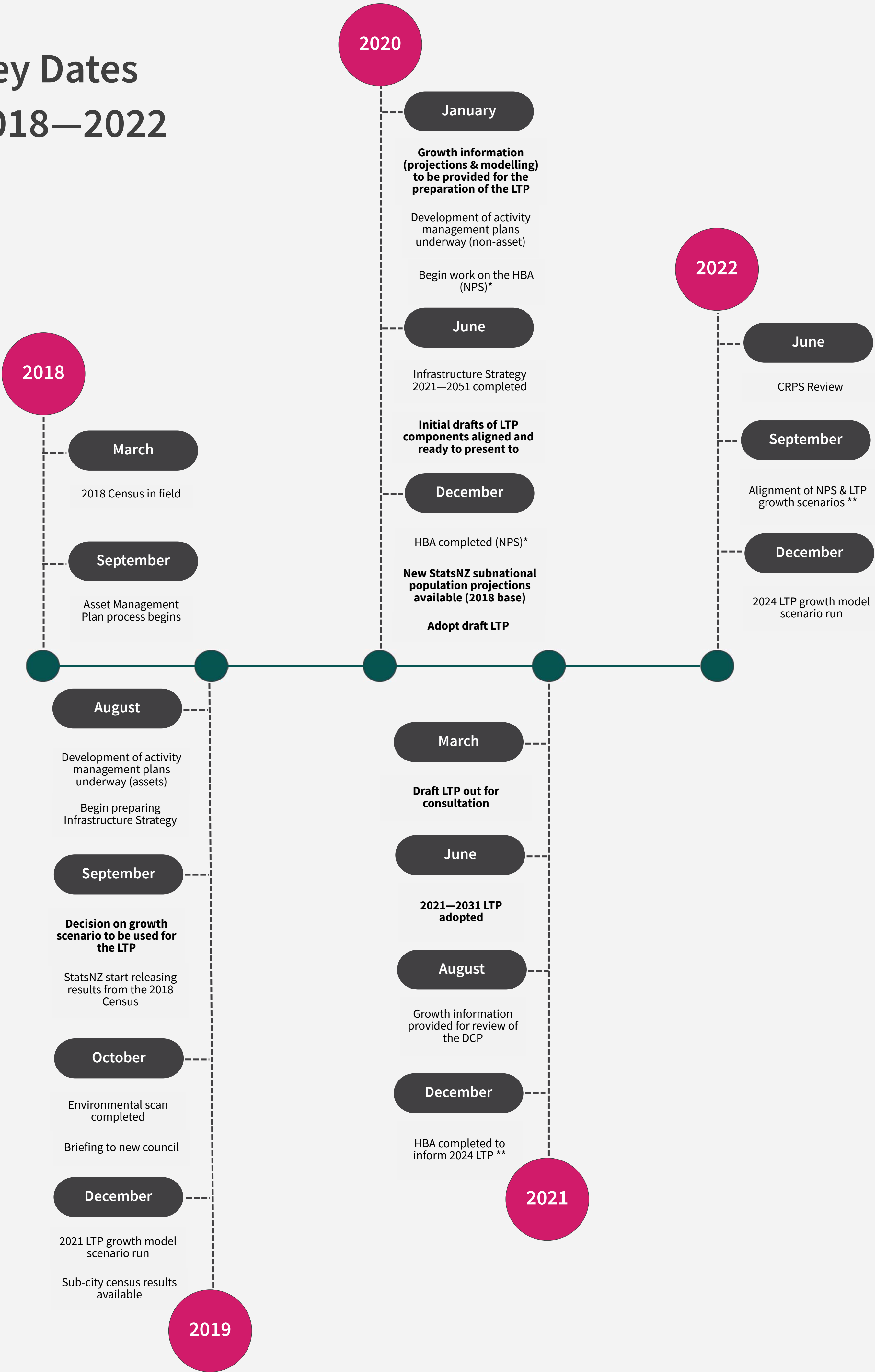
Map 7: Christchurch District Plan: Medium Density Residential Zones focussed around Central City and Key Activity Centres\*

\*darker colour denotes higher densities



# Key Dates

## 2018—2022



\* Based on requirements in current NPS-UDC

\*\* Based on requirements in proposed NPS-UD (use capacity assessment to inform LTP)

20 September 2022

Hon David Parker

PO Box 18 888

Parliament Buildings

Wellington, 6160

Email: d.parker@ministers.govt.nz

Tēnā koe Minister

Christchurch City Council - Proposed Plan Change 14 Housing and Business Choice

As you are aware, our Council declined to notify the proposed plan change to give effect to the NPS-UD

and the new provisions of the RMA to enable housing supply for Tier 1 councils.

You may not be aware that the Council authorised staff to undertake pre-notification engagement, which

resulted in extensive feedback being received from a wide range of community groups. There was support for intensification to address both housing supply and affordability issues, however there were

serious concerns raised about the impact of the one-size-fits-all intensification approach.

As a Council, we have asked Ministers and officials to take our unique circumstances into account from

the outset of the NPS-UD process. This legislation has never made sense for Ōtautahi Christchurch in the

context of the extensive post-earthquake land-use changes that were made to the Christchurch District

Plan. Unfortunately, these changes took effect after the initial report you relied on in your First Reading

speech on the RMA Amendment Bill last year. I covered this, and many other critical issues, in my oral

submission, which I have attached to this letter.

Our environment and our planning arrangements are quite different to both Auckland and Wellington.

With our neighbours to the north and south, we stretch into the Canterbury Plains. We are much flatter

than our counterparts in the north, and we don't have the valleys and gullies which naturally inhibit development elsewhere. This means the impact of the housing intensification provisions is significantly

greater when it comes to tree canopy and liveability.

Through our existing planning arrangements, which include the Greater Christchurch Partnership and

now the Whakawhanake Kāinga Committee (Urban Growth Partnership with central government), we

are already seeking to address housing affordability and availability – without exacerbating urban sprawl

– by (under our current District Plan) enabling intensification in areas where it makes sense i.e. focussing

on centres and key public transport routes.

I am aware that the Council is now technically in breach of our statutory obligations and that there are

powers available to Ministers to intervene. I am asking Ministers not to do so.

Christchurch City Council – Medium Density

Residential Standards

Page 2 of 4

Instead, I am calling on you to work alongside the Council to find a bespoke solution for Ōtautahi Christchurch that meets the Government's objectives whilst promoting a sustainable urban form that

protects our tree canopy and enhances the liveability of our city. It is what our residents want, and it is in

the best interests of the city that we do. In fact, it will enable the development of a well-functioning urban environment, as anticipated by the NPS-UD.

Given that voting for local body elections closes on 8 October, I hope that you agree it would be most

appropriate to allow the new Council time to investigate a solution once governance arrangements are

in place.

In the meantime, Council staff are ready and willing to work alongside your officials in more detailed discussions about possible options, until the new Council is in a position to engage.

I have attached more detailed information which supports the position set out in this letter. I have also

attached a letter from Professor Peter Skelton, former Judge of the Environment Court and former Canterbury Regional Council Commissioner, who has very kindly written to me in support of the Council

position on this matter.

I would greatly appreciate a response from you on the approach we are recommending before Thursday

29 September, so that I can report this to my colleagues before the Council breaks up for the election

period.

While I won't be on the new Council, I fervently hope that the new Council and the Government can collaborate on finding a solution that is tailored to the special circumstances of Ōtautahi Christchurch.

Ngā mihi

Lianne Dalziel

Mayor of Christchurch

cc Hon Nanaia Mahuta

Hon Dr Megan Woods

Hon Phil Twyford





Details of submitter No: 903 - Patricia Harte

Submitter:	Patricia Harte
Submitter Address:	
Organisation:	Danne Mora Limited

## Our proposed Housing and Business Choice Plan Change (14)

## Submitter Details

Submission Date: 22/05/2023

First name: Alice

Last name: Burnett

Organisation: Danne Morta Limited

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	
Danne Mora - Email	
Submission to PC14 Danne Mora	
New Item - Monsaraz Boulevard 2 - Spreydon Lodge - HID PC13 Council Submission	

**Mulder, Andrea**

---

**From:** Alice Burnett <[REDACTED]>  
**Sent:** Thursday, 4 May 2023 4:16 pm  
**To:** Engagement  
**Cc:** Ian Thompson - Danne Mora Residential  
**Subject:** Submission on Plan Change 14 on behalf of Danne Mora  
**Attachments:** Submission to PC14 Danne Mora.pdf; New Item - Monsaraz Boulevard 2 - Spreydon Lodge - HID PC13 Council Submission.PDF

Good afternoon,

Please see attached the submission on Plan Change 14 to the District Plan on behalf of Danne Mora.

Can you please acknowledge receipt of this.

Kind regards,

**Alice Burnett** | Planner



[REDACTED]

*Confidentiality: The information contained in this email message may be legally privileged and confidential. If the reader of this message is not the intended recipient, please notify us immediately and destroy the original.*



**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](mailto:engagement@ccc.govt.nz)

---

**1. Submitter Details**

**Submitters name:** Danne Mora Limited

**Address For Service:**

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

---

**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

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**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>
<b>Planning Maps</b>	<input checked="" type="checkbox"/> Oppose in part	<p>There is inconsistency with the Interactive GIS map and the PDF versions of the Planning Maps regarding:</p> <ul style="list-style-type: none"> <li>the Meadowlands Exemplar Overlay The Meadowlands Exemplar Overlay is no longer necessary as the area is very largely developed. In addition, the proposed new High Density Zoning over this area has its own regime which is not compatible with the exemplar provisions. Further the exemplar provisions do not enable or encourage residential development as they necessarily involve obtaining resource consents for individual developments. It is for this reason that Plan Change 10 to the District Plan was accepted which removed the Meadowlands exemplar overlay from the eastern extent of the Halswell Commons development.</li> <li>a heritage setting overlay on 2 Monsaraz Boulevard / Lot 3 DP 517333 CCC Heritage team has contacted the submitter to identify Spreydon Lodge as a heritage building and heritage setting. While an agreement was reached about the boundaries and listing, due to timing of the agreement, the agreed listing and boundaries CCC staff confirmed that it wouldn't be included in either PC1 or PC13 and would be addressed in a submission from CCC, to which Danne Mora would further submit on in support. The notified boundaries are inconsistent with the agreement reached with CCC. As such we seek to amend the heritage</li> </ul>	<ul style="list-style-type: none"> <li>Remove Meadowlands Exemplar</li> <li>Remove/amend heritage setting unless the listing is approved under PC13</li> <li>Consistency with overlay colours/key</li> </ul>

<b>Provision to which my/our submission relates:</b> <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>	<b>My position on this provision is:</b> <i>(Select one option)</i>	<b>The reasons for my/our submission are:</b> <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>	<b>The decision I/we want Council to make:</b> <i>(Please specify if you want the provision to be retained, amended or deleted, eg Amend – change the activity status to non-complying)</i>
		<p>setting as shown on the attached plan. We understand CCC will be including this site in their submission on PC13</p> <ul style="list-style-type: none"> <li>• The Town Centre Intensification Precinct is show as either a green line or blue line</li> </ul>	
<b>Planning Maps / High Density Residential Zone</b>	<input checked="" type="checkbox"/> Oppose in part	<p>It is unclear how the high density zone boundaries have been determined. Based on the Section 32 report it is presumed to be based on the type of commercial area in which it surrounds and the walkable catchment associated with the commercial area. The Section 32 contemplates a variety of walkable catchments, however it is unclear what walkable catchments apply to what commercial area. Furthermore, it is unclear how the walkable catchments are measured – i.e., from the edge of the commercial zone or the middle of the commercial zone.</p> <p>In particular it is hard to determine the walkable catchment of the North Halswell KAC for the following reasons:</p> <ul style="list-style-type: none"> <li>• Measuring from 1 Rowley Cres to the edge of the commercial zone is approximately 615m, following publicly accessible land;</li> <li>• Measuring from 23 Barrowclough Street to the edge of the commercial zone is approximately 685m, following publicly accessible land;</li> <li>• Measuring from 1/275 Hendersons Road to the edge of the commercial zone is approximately 300m;</li> <li>• The high density zone is located on land that has yet to be developed and follows southern the land parcel boundary of Lot 503 DP 583268</li> </ul> <p>We seek that the High Density Residential Zone be amended to terminate at the Manarola Road boundary with all land to the south owned by Spreydon Lodge Limited to be zoned FUZ. Having a large area of High Density Residential land around the TCZ in North Halswell is counterintuitive as the TCZ enables residential activities (Policy 15.2.2.7</p>	<p>Amend the High Density Residential Zone boundary to stop at Manarola Road with all land to the south owned by Spreydon Lodge Limited to be zoned FUZ, including Lot 3000 DP 575180, Lot 121 DP 514750 and Lot 120 DP 514570.</p> <p>Support the FUZ zoning of Lots 120 and 121 DP 514750.</p>

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>
		and Rule 15.4.1.1 P21). and the High Density Residential duplicates the extent of high density residential activity needed to support the TCZ	
<b>Appendix 8.10.4 North Halswell Outline Development Plan – Map Only</b>	<input checked="" type="checkbox"/> Oppose in part	<p>The removal of some land parcels in the North Halswell Outline Development Plan Area creates issues as to what provisions apply, including the location of roading and reserves. It appears as though the Town Centre Zone, High and Medium Density zoned land has been removed from the ODP. Furthermore, areas which have been identified appear to be within the ODP boundaries but are not identified in the key and vice versa. These changes are confusing, and it is unclear from the Section 32 reports as to why this change has been made. This is of particular concern as there are still parcels of land that are yet to be developed. It has been normal practice to retain ODPs in full until all land within an OPD area has been developed.</p> <p>The ODP which exists in the current District Plan, identifies the 'residential development area' and does not refer to the specific zone. This approach is preferable as it indicates how the area is to be developed as for what purpose. The change in zone name &amp; density requirements is not considered a reason to remove some areas from the ODP. Notwithstanding the change in terminology, key structural elements of ODP remain relevant and should remain to inform future development,</p> <p>The rules associated with the ODP are confusing in terms of what areas within the ODP they apply to.</p>	<ul style="list-style-type: none"> <li>• Retain the current boundaries of North Halswell Outline Development Plan Area, where it relates to residentially zoned land AND</li> <li>• remove Quarrymans Trail from the ODP.</li> </ul>
<b>Appendix 8.10.4 North Halswell Outline Development Plan – Text Only</b>	<input checked="" type="checkbox"/> Oppose in part	<p>There have been numerous land use changes and development within the North Halswell Outline Development Plan area consented by Council since the ODP was included in the Christchurch District Plan. It is considered appropriate and convenient to take the opportunity to amend the ODP to reflect these changes to provide an up-to-date Plan for future development.</p> <ul style="list-style-type: none"> <li>• We support the removal of the references to the Meadowlands Exemplar Overlay</li> </ul>	<ul style="list-style-type: none"> <li>• We support the removal of the references to the Meadowlands Exemplar Overlay</li> <li>• Remove reference to Quarryman's Trail as this has been constructed outside of the ODP boundaries 8.10.4 D(4)(g) and (h)</li> </ul>



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>
		<ul style="list-style-type: none"> <li>Remove reference to Quarryman's Trail as this has been constructed outside of the ODP boundaries 8.10.4 D(4)(g) and (h)</li> <li>Accurately reflect resource consents which have amended road layouts and reserve locations</li> </ul>	<ul style="list-style-type: none"> <li>Update the ODP to reflect the updated location of structural elements such as roads, access points and reserves</li> </ul>
<b>Chapter 2 Definitions</b> <b>"Context and Site Analysis",</b> <b>"Future development</b> <b>allotment" and</b> <b>"Neighbourhood Plan"</b>	<input checked="" type="checkbox"/> Oppose in full	As the definitions of "Context and site analysis", Future development allotment" and "Neighbourhood Plan" relate only to the Meadowlands Exemplar Overlay area, which is to be removed. It is not necessary to retain these definitions.	Delete definitions of "Context and site analysis", "Future development allotment" and "Neighbourhood Plan"
<b>Chapter 2 Definitions</b> <b>New definition – Net Yield</b>	<input checked="" type="checkbox"/> Support in full	We support the shift towards the use of net yield as a replacement for net density. Net yield is a more accurate measure of housing density and as a mechanism to deliver better design outcomes. To provide clarity on how net yield is to be calculated and to differentiate from net density it is recommended the following definition be included in the District Plan	Include a new definition in Chapter 2 of net yield as follows: means the number of lots or household units per hectare (whichever is the greater). The area (ha) includes land for: residential activities The area (ha) excludes land that is: public road corridors public open space areas
<b>Chapter 2 Definitions</b> <b>Building Coverage</b>	<input checked="" type="checkbox"/> Support in full	Support the inclusion of this definition as it reflects the National Planning Standards definition	Retain the definition as notified
<b>Chapter 2 Definitions</b> <b>Building Footprint</b>	<input checked="" type="checkbox"/> Support in full	Support the inclusion of this definition as it reflects the National Planning Standards definition	Retain the definition as notified
<b>Strategic Objective 3.3.7</b> <b>Well-functioning urban environment</b>	<input checked="" type="checkbox"/> Oppose in part	The first part of the new objective is required under Clause 3A of the Enabling Act. We note that the Environment Court has ruled that Strategic Directions are only to be considered for plan changes and not for individual resource consents. As such the level of detail proposed, in addition to the requirements of the Enabling Act are unnecessary.	Amend Objective 3.3.7 to only be that identified in red of the notified version: <u>3.3.7 Objective – Well-functioning urban environment</u> <u>A well-functioning urban environment that enables all people and communities to provide for their social, economic, and</u>

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>
			<u>cultural wellbeing, and for their health and safety, now and into the future</u>
<b>Rule 6.10A.4.1.1 P1</b>	<input checked="" type="checkbox"/> Oppose in part	<p>It is unclear why the tree canopy rule requirements only apply to residential developments. Given the Council has signalled to reduce carbon emissions, reduce stormwater runoff, mitigate heat island effects and improve the city's biodiversity and amenity, it is unclear why residential development needs to solely overcome these matters.</p> <p>There has been no consideration for environmental or site specific constraints as to whether trees that are required to be planted will survive. Constraints such as high groundwater have proven difficult for residential developments to plant and retain the trees within the road corridor.</p> <p>We are continuously having issues with the street tree team at CCC for approving trees within the road corridor which is costly and causing undue delays to those developing the land.</p> <p>The tree canopy requirement for individual lots has not been thought through well. It is most likely that the canopy will be provided near or within outdoor living space areas. Having a large tree canopy in these areas will be at the detriment of sunlight and solar gain into the dwellings themselves. The very thing CCC are trying to prevent through the inclusion of a different recession plane rule framework.</p>	Require the tree canopy rule applies to all new development in the city.
<b>Rule 6.10A.4.1.1 P2</b>	<input checked="" type="checkbox"/> Oppose in part		
<b>Rule 6.10A.4.1.1 P2</b>	<input checked="" type="checkbox"/> Oppose in part	It is appropriate for a greenfield subdivision to either provide street trees or pay a financial contribution for it. What is not considered appropriate is for a greenfield subdivision which is creating vacant lots for further development to have to also provide or pay for the tree canopy cover for the residential units at the time of subdivision. The definition of development site as applied to a subdivision would encompass all the land contained within the subdivision, including	<p>Amend the rule so that only the 15% street tree canopy requirement is applicable to a vacant lot greenfield subdivision.</p> <p>Delete Activity specific standards – Tree canopy cover clause (a) and (b), an ament</p>

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>
		roads and reserves. That would mean that the area of land within the roads would be counted twice – once for the 20% development site cover under point (a) and again for the 15% road corridor cover under point (c). These means that 20% cover calculated at the time of the subdivision would be much larger than for the individual residential allotments created. On seeking clarification from Council staff. It was suggested that a consent notice would be placed on the residential lots to require the 20% cover, as per point (a) of this rule. It's unclear whether this 20% would be the calculation of the overall development site as noted above, or for each lot. If it is for each lot, then requiring 20% cover under P2 is not necessary, as the development of each individual is covered by P1.	clause (d) to only refer to the 15% road corridor cover.
<b>6.10A.4.1.3 RD2</b>	<input checked="" type="checkbox"/> Support in part	In greenfield subdivisions there are a number of situations where reserves are vested to Council with enhancements. For example, enhancing waterways. In these situations, reserve contributions are not attributed to these reserves. We therefore support the approach by Council that these reserves can offset the tree canopy rule requirements. However, we consider that this needs to be more explicit in the rules to ensure this happens	Amend to rule to make it clear that reserves that are vested to Council with enhancements can offset the tree canopy rules for the development.
<b>8.2.6.2</b> <b>8.3.3</b> <b>Standard 6.10A.4.2.2</b>	<input checked="" type="checkbox"/> Oppose in part	There is no reasoning given in any of the Section 32 documentation for how the financial contribution of \$2,037.00 per tree has been calculated. Furthermore, it is unclear whether this is GST inclusive or not. The figure does not appear to relate to the Minimum Acceptable Rates provided for bonding under the IDS or for the maintenance period of 2 years. The CCC bond schedule for street trees allows for: For street trees that is \$500 per tree (includes the tree pit), and \$40 per tree per month for maintenance. Total per tree for 2 year bond period of \$1,460.00 all excl GST. With GST included that is only \$1,679.00. Assuming \$2,037 is excluding GST this is 1 tree plus 38.4 months maintenance. If Inc GST its 31.7 months of maintenance.	Make clearer in the plan how the costs have been attributed and whether it is GST inclusive.

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>
<b>Standard 6.10A.4.2.3</b> <b>8.2.6.3</b> <b>8.3.7</b>	<input checked="" type="checkbox"/> Oppose in part	It is unclear how Council will enforce the tree canopy rules on individual properties & within their own road reserve network. How will compliance be measured? Furthermore, will Council report on the compliance of the tree canopy rules and what projects the financial contributions go towards? Issues could arise where the species planted may be appropriate at the time but due to unforeseen circumstances, the vegetation may die and need to be replaced. Based on previous experiences, when Council needs to cut budgets the first departments this is impacted on are the reserves and maintenance teams and the monitoring and enforcement teams.	
<b>Objective 8.2.2</b>	<input checked="" type="checkbox"/> Support in part	We support the removal of the provisions and overlay which specifically relates to the Meadowlands Exemplar Overlay which has been deleted as part of PC14. Acknowledging that the Section 32 report does not include rationale as to why the Overlay should be deleted, we note the following: <ul style="list-style-type: none"> <li>PC10 decision acknowledged the complexity of the Overlay and how it had failed to deliver the intended purpose.</li> <li>The Overlay is complex and unworkable with no permitted land use activities, thus always requiring resource consent for every dwelling. This is inconsistent with the intentions of the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021. The PC10 decision reflects this point.</li> </ul>	Support the removal of the Meadowlands Exemplar Overlay references in Objective 8.2.2
<b>Policy 8.2.2.11 - Meadowlands Exemplar Overlay comprehensive development</b>	<input checked="" type="checkbox"/> Support in full		Support the removal of Policy 8.2.2.11
<b>Rule 8.1.5.3 RD15</b>	<input checked="" type="checkbox"/> Support in full		Support the removal of RD15
<b>Rule 8.1.5.4 D5</b>	<input checked="" type="checkbox"/> Support in full		Support the removal of D5
<b>Rule 8.1.5.5 NC8</b>	<input checked="" type="checkbox"/> Support in full		Support the removal of NC8
<b>Policy 8.2.2.7 – Urban Density</b>	<input checked="" type="checkbox"/> Support in part	We welcome the use of the terms 'net yield' where it applies to the Residential Medium and High Density Zones as this term includes the gross area of the site and is not constrained by the definition of 'net density'. Net yield is presumed to have been chosen due to the wording of the policy to encourage a certain yield in the Medium and High Density Zones.	Retain Policy 8.2.2.7 as notified where it relates to the net yield specified for the Medium and High Density Zones.  Include a new definition in Chapter 2 of net yield as specified above.



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>
		It is unclear how this policy can be enforced to achieve this desired yield. It is recommended a new definition be included in Chapter 2 for net yield.	
<b>Activity Standard 8.6.2</b>	<input checked="" type="checkbox"/> Oppose in part	It is unclear whether there is a minimum allotment for the FUZ. The drafting of the provision as notified removes the reference to 'Nil' for the previous named zoned of RNN. We suggest it is clearer within the standard that there is no minimum allotment size in the FUZ zone around existing buildings.	Amend the standard to make it clear that there is no minimum allotment size in the FUZ zone around existing buildings.
<b>Activity Standard 8.6.8(e) Wastewater Disposal</b>	<input checked="" type="checkbox"/> Support in part	Support the deletion requiring the discharge of wastewater from the Meadowlands Exemplar Overlay to Pump Station 42. This pipework has already been installed. As a result of the Overlay being removed, it is considered appropriate to remove this requirement entirely.	Support the deletion of (e)
<b>Activity Standard 8.6.13 East Papanui / Meadowlands Exemplar Overlay (North Halswell)</b>	<input checked="" type="checkbox"/> Support in part	We support the deletion of references to the Meadowlands Exemplar Overlay within the activity standard. However, the changes are inconsistent as terms such as the Neighbourhood Plan and Context and Site Analysis continue to be referred to in the standard. These terms are specific to the Meadowlands Exemplar Overlay. It is unclear why this standard is proposed to be assessed in the East Papanui context. This is not specified in the Section 32 report.	Support the deletion of references to the Meadowlands Exemplar Overlay.  Amend the standard to remove Meadowlands Exemplar Overlay specific terms such as Neighbourhood Plan and Context and Site Analysis.
<b>Activity Standard 8.6.15 North Halswell</b>	<input checked="" type="checkbox"/> Oppose in full	The wording of this provision is unclear as to what areas it relates to. Given the changes to the ODP boundaries, it is assumed to be the areas which used to be within the previous ODP boundaries and not properties to the north of Hendersons Road, west of Halswell Road, south of Milns Road and east of Sparks Road. The drafting of this provision makes interpretation of the plan difficult and unworkable. Consistent with our relief sought above, we seek to reinstate the current ODP and its boundaries. If Council is of a mind to retain this provision, then better drafting is required to identify the area in which this provision applies to.	Delete Activity Standard 8.6.15

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<b>Rules as Matters of Control – Subdivision 8.7.13</b>	<input checked="" type="checkbox"/> Oppose in full	As discussed previously, our preference is to reinstate the current ODP and its boundaries therefore, this provision is not required.	Delete Matter of Control 8.7.13
<b>Rules as Matters of Discretion – Subdivision 8.8.15</b>	<input checked="" type="checkbox"/> Support in part	We support the deletion of references to the Meadowlands Exemplar Overlay within the matters of discretion. However, we note that there are inconsistencies in what has been proposed by PC14. CCC appear to have made 8.8.15 and its sub sections applicable to East Papanui. There is no rationale for this in the Section 32 report. Where the provision relates to Meadowlands Exemplar Overlay, we seek to delete all sections.	Delete Matter of Discretion 8.8.15, 8.8.15.1(b), 8.8.15.5(a)(i) where it applies to the North Halswell ODP, 8.15.6(g) where it applies to the South West Stormwater Management Plan, 8.8.15.7, 8.8.15.12, 8.8.15.11(c) where it refers to the exemplar area,
<b>Rules as Matters of Discretion – Subdivision 8.8.13 Additional Matters-Subdivision in the Medium and High Density Residential Zones at North Halswell</b>	<input checked="" type="checkbox"/> Oppose in full	It is unclear where this applies to. PC14 have amended the boundaries of the North Halswell ODP to exclude areas proposed to be zoned High and Medium Density Residential. As such it is unclear how this provision would be assessed. Notwithstanding this, it is our preference to reinstate the current ODP and its boundaries. As such it is not necessary for this provision to exist.	Delete 8.8.13 Additional Matters-Subdivision in the Medium and High Density Residential Zones at North Halswell
<b>High Density Residential Zone Built Form Standard 14.6.2.1 b.</b>	<input checked="" type="checkbox"/> Oppose in full	No reasons or justification for setting a minimum height of 7m for residential units are provided in any of the background reports for PC14 or in the NPS – Urban Development. This standard effectively requires all dwellings to have 2 storeys and relates to large areas throughout the city, including in North Halswell. The NPS-UD is intended to be enabling in the sense of encouraging higher density development, however it does prescribe any requirement for more intensive forms of development as proposed by this standard. High density living can be achieved without a minimum height requirement. The minimum height 7m is considered to be restrictive as opposed to enabling. The imposition of the High Density Residential Zone has wider implications for development within the North Halswell ODP that have been established for a considerable period of time and on which	Delete High Density Zone Built form standard 14.6.2.1.b requiring residential units to be not less than 7m above ground level.

<p>Provision to which my/our submission relates:</p> <p><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></p>	<p>My position on this provision is:</p> <p><i>(Select one option)</i></p>	<p>The reasons for my/our submission are:</p> <p><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></p>	<p>The decision I/we want Council to make:</p> <p><i>(Please specify if you want the provision to be retained, amended or deleted, eg Amend – change the activity status to non-complying)</i></p>
		<p>considerable residential and infrastructure master planning is predicated.</p> <p>The implications of this standard at a micro level are also significant, particularly in existing developed residential areas that are proposed to be zoned High Density Residential. These areas predominantly have single storey dwellings. If any homeowner wishes to construct an extension or such like, they may require a resource consent if the extension is less than 7m high. This creates issues for landowners and the Council as it is not clear how such a consent would be assessed. This matter is exacerbated by there being no relevant objectives or policies supporting this approach.</p>	
<p><b>Built Form Standard 14.5.2.4 Site Coverage</b></p>	<p><input checked="" type="checkbox"/> Support in part</p>	<p>The rule requirement provides for a maximum building coverage of up to 50% of the net site area. Building Coverage is defined under the PC14 as being:</p> <p>Within the Medium Density Residential zone and High Density Residential zone only, means the percentage of the net site area covered by the building footprint.</p> <p>This is a National Planning Standard definition. Building footprint is also defined in PC14, and again is a Planning Standard definition. That definition is:</p> <p>means, in relation to building coverage, the total area of buildings at ground floor level together with the area of any section of any of those buildings that extends out beyond the ground floor level limits of the building and overhangs the ground.</p> <p>The above means that eaves and gutters are included within the site coverage calculations. In considering the submissions on the Planning Standards definitions, the Ministry for the Environment commented that these can be excluded through the rules within a District Plan. It is standard practice to calculate site coverage as being from exterior wall to exterior wall, and not to include eaves and gutters. Including eaves and gutters within the site coverage calculation limits the potential</p>	<p>Amend the exclusion of eaves and roof overhangs to be:</p> <p>Eaves and roof overhangs up to 600 mm in width</p>

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>
		design options and could impact on the ability to implement the MDRS as intended. We are therefore supportive of the Councils approach to excluding guttering and roof overhangs. However, we seek that the dimensions of these features be increased to be consistent with the RNN/FUZ requirements	
<b>Built Form Standard 14.5.2.6 Height in relation to boundary (a) and (c)(ii)</b>	<input checked="" type="checkbox"/> Oppose in part	The drafting of subpart (a) is confusing. We prefer the wording of 14.6.2.2.  Acknowledging that the inclusion of subpart (c)(ii) is a requirement under Schedule 3A, it is hard to understand what situation the recession plane standard would apply. Subpart (c)(ii) excludes the recession plane standard for existing or proposed internal boundaries.	Amend 14.5.2.6(a) to state: No part of any building shall project beyond a building envelope constructed by recession planes shown in Appendix 14.16.2 diagram D from points 3m above ground level along all boundaries. <del>Where</del> the boundary forms part of a legal right of way, entrance strip, access or pedestrian access way, the height in relation to boundary applies from the farthest boundary of that legal right of way, entrance strip, access site, or pedestrian access way. Make it clearer what boundaries the recession planes are to apply to.
<b>Built Form Standard 14.5.2.7 Minimum building setbacks (iv)</b>	<input checked="" type="checkbox"/> Oppose in part	It is unclear what setback applies for accessory buildings and garages that internally access a residential unit. We consider 'Nil' has been struck out in error as the remaining wording doesn't specify a setback.	Amend 14.5.2.7(iv) to state that there is no setback.
<b>Built Form Standard 14.5.2.11 Windows to street (c)</b>	<input checked="" type="checkbox"/> Oppose in part	Amend wording of subpart (c) so that the term 'road' is identified as a definition so that it refers to a legal road.	Amend 14.5.2.11 to ensure the term 'road' is identified as a definition.
<b>Built Form Standard 14.6.2.8 Windows to street (c)</b>	<input checked="" type="checkbox"/> Oppose in part	Amend wording of subpart (c) so that the term 'road' is identified as a definition so that it refers to a legal road.	Amend 14.6.2.8 to ensure the term 'road' is identified as a definition.
<b>14.12 Rules Future Urban Zone Advice Note 1</b>	<input checked="" type="checkbox"/> Oppose in full	The following advice note at the head of the Future Urban Zone rules is redundant due to the area being rezoned. <i>Advice note: 1. The rules</i>	Delete Advice Note in 14.12 Rules Future Urban Zone



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		<i>relevant to the Meadowlands Exemplar Overlay in the Residential New Neighbourhood Future Urban (North Halswell) Zone shown on Planning Map 45 are contained in Chapter 8, see Rules 8.5.1.3 RD15, 8.5.1.4 D5 and 8.5.1.5 NC8.</i>	
<b>Rule 14.12.1.3 RD28</b>	<input checked="" type="checkbox"/> Oppose in full	Whilst we acknowledge this provision has come as a result of the Plan Change 10 decision, the standard is contrary to the requirements of the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 as it is restricting residential development.	Delete RD28 Buildings that do not meet Rule 14.12.2.18 – Roof form – Area 1 Appendix 8.10.4 North Halswell ODP
<b>Built Form Standard 14.12.2.18 Roof form – Area 1 – Appendix 8.10.4 North Halswell ODP</b>	<input checked="" type="checkbox"/> Oppose in full	Furthermore, in the notified version of PC14, Area 1 as identified in the Plan Change 10 decision is not shown on the North Halswell ODP and is in fact outside of the proposed boundaries of the ODP.	Delete Built Form Standard 14.12.2.18
<b>Waterbody setback layer on District Planning Maps</b>	<input checked="" type="checkbox"/> Oppose in part	<p>The waterbody setbacks are not changing as part of PC14 which is supported by the submitter. However, the location of the drains on the planning maps is problematic as in many cases these waterbodies are required to be enhanced and naturalised or decommissioned, therefore the overlay on the planning maps may trigger a resource consent when the drain is in another location entirely or no longer there. An example of this is Dunbars Drain where the interactive planning maps shows its alignment running through 35 Navarra Road when in reality the waterbody is located within the Councils Local Purpose Reserve (Lot 2009 DP 568152).</p> <p>We note that there have been new waterbodies included on the planning maps which has not been shown on the planning maps previously. For example; Day's Drain.</p> <p>Our preference is for the waterbodies to be shown as indicative only. The alternative is to show the waterbodies in their correct location or not at all.</p>	The waterbodies on the planning maps are to be identified as 'indicative locations only' or alternatively to show them in their correct location or not at all.

Alice Burnett

4 May 2023

Signature of person authorised to sign on behalf of submitter

Please click on the link below to view the document

[https://makeasubmission.ccc.govt.nz:443/manage/Docs/PID\\_294/294\\_15935C0QEQ0\\_Danne Morta Limited - Burnett Alice - New Item - Monsaraz Boulevard 2 Spreydon Lodge HID PC13 Council Submission.PDF](https://makeasubmission.ccc.govt.nz:443/manage/Docs/PID_294/294_15935C0QEQ0_Danne_Morta_Limited_-_Burnett_Alice_-_New_Item_-_Monsaraz_Boulevard_2_Spreydon_Lodge_HID_PC13_Council_Submission.PDF)

**Details of submitter No: 1090 - Faye Collins**

<b>Submitter:</b>	Faye Collins
<b>Submitter Address:</b>	[REDACTED]
<b>Behalf of:</b>	Waipuna Halswell-Hornby-Riccarton Community Board



## Our proposed Heritage Plan Change (PC13)

### Submitter Details

**Submission Date:** 22/05/2023

**First name:** Helen

**Last name:** Broughton

**Organisation:**

Waipuna Halswell-Hornby-Riccarton Community Board

**On behalf of:**

Waipuna Halswell-Hornby-Riccarton Community Board

**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	
Waipuna Halswell-Hornby Riccarton Community Board PC13- email	
Final - Draft Heritage Plan Change 13 Submission	

**Mulder, Andrea**

---

**From:** Collins, Faye  
**Sent:** Friday, 12 May 2023 4:17 pm  
**To:** Engagement  
**Cc:** Broughton, Helen  
**Subject:** WAIPUNA HALSWELL HORNBY RICcarton SUBMISSION ON PLAN CHANGE 13  
**Attachments:** Final - Draft Heritage Plan Change 13 Submission.pdf

Good afternoon,

Please find attached the community Board's submission on Plan Change 13 -Heritage.

**Faye Collins****Community Board Adviser**

Comm. Governance Team (Hal-Hor-Ric)



03 941 5108



[faye.collins@ccc.govt.nz](mailto:faye.collins@ccc.govt.nz)



Rārākau: Riccarton Centre, 199 Clarence Street



PO Box 73022, Christchurch 8154



[ccc.govt.nz](http://ccc.govt.nz)

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**Christchurch**  
City Council 

## **Proposed Heritage Plan Change (PC13)**

### **Waipuna Halswell Hornby Riccarton Community Board**

#### **1 Introduction**

- 1.1. The Board recognises that the proposed Heritage Plan Change (PC13) (“the Plan”) is notified alongside the Housing and Business Choice Plan Change (PC14) that aims to address population growth, housing issues, including affordability, and climate change and to bring the District Plan in line with government direction given via the National Policy Statement-Urban Development and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (“the Act”) to enable more development in the city’s existing urban footprint by allowing higher height limits within and around the city centre and suburban commercial centres.
- 1.2. The Board notes that Plan Change 13 Heritage identifies eleven proposed Residential Heritage Areas with buildings and features that are collectively significant to the city’s heritage and identity and also introduces a buffer for Residential Heritage Areas that have a high-density border, to better protect their edges. It is also proposed to add around 60 heritage buildings or items and building interiors to the Schedule of Significant Historic Heritage protected under the District Plan. As with existing scheduled buildings and items, these will require a resource consent for significant changes such as building alterations, relocation, or demolition. Both Residential Heritage Areas and additional buildings and items being added to the schedule for protection are proposed to be Qualifying Matters.

#### **2 Submission**

The Submission covers the following four aspects regarding Plan Change 13:

1. The Board is supportive of the proposal to protect residential character and heritage areas identified in the Plan, but considers there are other examples of areas with similar character to the areas proposed that should be identified in the Plan including areas of Hornby, South Hornby, Sockburn, Hei Hei, Islington, and Broomfield.
2. Support the proposed buffer between Residential Heritage Areas, bordering high density areas, but argues that a buffer is equally needed between the individual heritage buildings and items that are to be permitted in either high or medium density residential zones. The Board considers that developments of this scale could well detract from the value of these individual heritage buildings. The Board advocates for a buffer between individual heritage properties and higher or medium density developments.
3. Heritage settings need to be defined as meeting the significance threshold. The Council’s policy on heritage does not regard significant heritage settings as meeting the threshold. The Board understands other Councils do include heritage settings as being worthy of protection. (The Board will provide policies from other Councils at the hearing).

The Board considers that one example of a significant heritage setting is the foundation borough of Christchurch, Riccarton:

- The original cottage on the site is the first cottage of European settlement in Canterbury.
- Ngai Tuahiwi had a pa in the area before the Europeans arrived.
- Riccarton Bush is of National importance, as it is the only remaining example left of the indigenous forests of the plains- it is over 600 years old.
- Riccarton House is highly significant and retains its heritage interior.
- The original farm buildings.
- The historic Kahu Road bridge.
- Christchurch Boys' High School and war memorial.

In the Board's opinion a larger area could be included from Mona Vale, to the Britten stables (possible heritage) to the war memorial at Jane Deans Close (see below). In the attached Residential Heritage Area template this area meets 11 of the possible 13 criteria for a Residential Heritage area. The Board fails to understand why critical heritage settings are not seen as significant.

4. It is important to acknowledge that if this is not done the above collection of historic items and other historic settings may be engulfed by inappropriate development. WSP, (the consultancy engaged by Council) provided a drawing of three story and six story development (to be provided at a later date).

The Board recommends that significant heritage settings should be defined as meeting the significance threshold. The only suggestion the Board makes regarding preserving a heritage setting is that the zoning for housing around the setting remain at current levels, either residential suburban or residential suburban transitional density.

### **3 Request for an additional heritage item to be added to the list**

- 3.1 The Board recommends inclusion of a war memorial, sited in Jane Deans Close, in honour of those who died in the 20th Battalion in World War 2. The 20th Battalion left from this area and served in Greece, Crete and North Africa from 1940 to 1945. A well-attended Anzac service is held at the memorial every year.
- 3.2 Jane Deans Close is named after the early Riccarton settlor and community leader, Jane Deans, who lived in Riccarton Cottage and Riccarton House with her son after the untimely death of her husband. The war memorial was erected soon after the street was formed around 1997 replacing the original 1948 memorial.
- 3.3 The Board notes that there is proposed to be a buffer between the Residential Heritage Areas bordering high-density areas. The Board agrees that a buffer for Residential Heritage Areas is needed, but argues that a buffer is equally needed between the individual heritage buildings or items and any bordering developments that are to be permitted in either high or medium residential zones. The Board considers that developments of this scale on neighbouring properties could well detrimentally impact and detract from the value of these individual heritage buildings. Therefore the Board considers that a buffer is also required between these properties and neighbouring higher or medium density developments.



#### 4 Conclusion

4.1 The Board requests that the matters set out above in relation to Plan change 13 be taken into consideration.

The Board would like to speak to its submission.

A handwritten signature in black ink, appearing to read 'H Broughton', with a stylized flourish at the end.

Helen Broughton

CHAIRPERSON Waipuna Halswell-Hornby-Riccarton Community Board

Dated 12 May 2023.

### Potential RHA Review Template

Area Name -

Potential RHA's review criteria	Y/N	Notes
Moderate to high degree of authenticity and integrity		
Group of inter-related historic heritage places, buildings, structures and/or sites within a geographical area with clear boundaries that together address the interconnectedness of people, place and activities.	✓	
A comprehensive, collective and integrated place with coherent heritage fabric (not fragmented).		
Contains a majority of sites/building that are of defining or contributory importance to the RHA	✓	
Predominantly developed more than 30 years ago	✓	
Associated primarily but not necessarily exclusively with residential use		
Meets the minimum size for areas (one street block, one side of street/ minimum of approx. 15 properties)	✓	
Represents and embodies at least one of the heritage values in Appendix 9.3.7.1 at a significant or highly significant level: <ul style="list-style-type: none"> <li>• Historical and Social Significance</li> <li>• Cultural and Spiritual Significance</li> <li>• Aesthetic and Architectural Significance</li> <li>• Technological and Craftsmanship Significance</li> <li>• Contextual Significance</li> <li>• Archaeological and Scientific Significance</li> </ul>	✓	
Conveys/represents important aspects of the Christchurch District's cultural and historical themes and activities	✓	
Makes a significant contribution to the Christchurch District's sense of place and identity, and an understanding of its history and cultures.	✓	
Of heritage significance to the Christchurch District (and may also be of significance nationally or internationally)	✓	

## Details of submitter No: 1091 - Rosie Linterman

Submitter:	Rosie Linterman
Submitter Address:	

## Our proposed Heritage Plan Change (PC13)

## Submitter Details


**Submission Date:** 22/05/2023**First name:** Rosie**Last name:** Linterman**Postal address:****Email:****Daytime Phone:****Would you like to present your submission in person at a hearing?**

Yes

**Additional requirements for hearing:**

Also happy to speak if someone else made the similar submissions.

## Attached Documents

Name	
Rosie Linterman	



From: Rosie Linterman [rosie.linterman@gmail.com](mailto:rosie.linterman@gmail.com)  
Date: 12/05/2023 at 11:43:18 AM  
To: [rosielinterman@gmail.com](mailto:rosielinterman@gmail.com)

---

Sent from my iPad

We have lived in Beverley Street for over 40 years having purchased a very rundown property at number 36. We have continually renovated and maintained the buildings and gardens (including appearing before the urban design panel to ensure we have maintained a sympathetic style in keeping with the council intentions)

Beverley Street, owners and residents have all very proudly maintained the character of the street in their renovations and repairs as they appreciate the special characteristics of the street.

There are outstanding examples of Christchurch's best early 20th century architecture, and most houses are constructed in the same materials and style, creating a distinctive character.

The properties have garages and off street parking which is a major asset in a very narrow street.

It would be a backward step to lose the opportunity to retain a collection of houses of character, and very established gardens of an era by allowing the character overlay to be lifted and possible multi storey developments to occur. Despite its location in St Albans the street does not flood, assisted no doubt by the high foundations and considerable planting. Flooding could become a concern with multi story building and effectively no gardens.

Christchurch is concerned to retain its image as a garden city and stop the loss of greenery for health and aesthetic reasons. The retention of the character overlay would ensure that the established trees and extensive planting in Beverley Street would continue to contribute to this aim.

We request that Beverley Street be designated as a residential heritage area to protect its special characteristics, as has been the purpose under its designation as a characteristic character over the area. (previously known as a SAM)



## Details of submitter No: 1092 - Wynn Williams

<b>Submitter:</b>	Wynn Williams
<b>Submitter Address:</b>	<div></div>
<b>Organisation:</b>	Cambridge 137 Limited
<b>Behalf of:</b>	Lee Pee Limited



## Our proposed Heritage Plan Change (PC13)



## Submitter Details

**Submission Date:** 22/05/2023**First name:** Wynn**Last name:** Williams**Organisation:** Mark Pee Limited**On behalf of:** Mark Pee Limited**Postal address:****Email:****Daytime Phone:****Would you like to present your submission in person at a hearing?**

Yes

**Additional requirements for hearing:** happy to present with others who made the similar submissions.

## Attached Documents

Name	
Lee Pee Limited 1	
Lee Pee limited 2	

22 May 2023

Mark Stevenson  
Christchurch City Council  
C/- Engagement Team  
Email: [engagement@ccc.govt.nz](mailto:engagement@ccc.govt.nz)  
Cc: [mark.stevenson@ccc.govt.nz](mailto:mark.stevenson@ccc.govt.nz);  
[megan.pearce@ccc.govt.nz](mailto:megan.pearce@ccc.govt.nz)

Dear Mark,

**Submission on Plan Change 13 to the Christchurch District Plan**

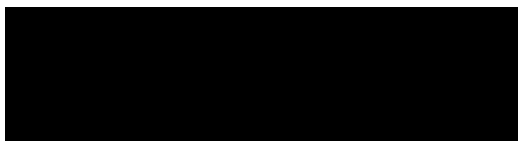
1. We act for Lee Pee Limited (**Lee Pee**). Please find **attached** to this letter a submission on Plan Change 13 to the Christchurch District Plan made by Lee Pee.
2. Our client contact is overseas based and regrettably this submission is being made late due to only having instructions to prepare and file this submission confirmed late last week.
3. Lee Pee respectfully requests that the Council exercise its powers under section 37 of the Resource Management Act 1991 to accept the submission outside of the statutory time period for filing the submission.
4. Given that the summary of decisions requested has not yet been notified (and according to the Council's website this will only occur "around June-July 2023") there is no prejudice to any party in accepting this late submission as the submission will be able to be summarised and notified with the summary of submissions in the usual manner.
5. Please contact me if you have any questions in relation to the above.

Yours faithfully  
**Wynn Williams**



**Lucy de Latour**

**Partner**



**SUBMISSION ON A NOTIFIED PROPOSAL FOR A POLICY STATEMENT OR PLAN,  
CHANGE OR VARIATION CLAUSE 6 OF SCHEDULE 1 OF THE RESOURCE  
MANAGEMENT ACT 1991**

**SUBMISSION ON HERITAGE PLAN CHANGE 13**

**Name of Submitter:** Lee Pee Limited (**LPL**)

**Introduction and Summary**

1. This is a submission on the Christchurch District Council (the Council's) Proposed Heritage Plan Change 13 (**PC13** or the **Plan Change**) to the Christchurch District Plan.
2. LPL could not gain an advantage in trade competition through this submission.
3. LPL **opposes** the listing of 137 Cambridge Terrace (Harley Chambers) in **Appendix 9.3.7.2** 'Schedule of Significant Historic Heritage' and seeks **deletion** of 137 Cambridge Terrace (Harley Chambers) from the Appendix.
4. The basis for opposition is that the respective Statement of Significance for Harley Chambers bears no reality to:
  - a. the condition of the building,
  - b. its seismic risk, and that
  - c. any endeavours to provide any purpose or function would be both financially unsupportable and result in the removal of residual heritage fabric to the extent that the building would not warrant scheduling.
5. Accordingly, the retention of 137 Cambridge Terrace within **Appendix 9.3.7.2** is not the most appropriate way to achieve **Objective 9.3.2.1.1** and **Policy 9.3.2.2.1**, and in particular **Policy 9.3.2.2.1(c)(i)** and **(ii)** as these relate to significance, integrity, engineering and financial reasonableness.

**Relief Sought**

6. LPL seeks to:
  - a. **Delete** within **Appendix 9.3.7.2** 'Schedule of Significant Historic Heritage' reference to the Heritage Listing (Building and Setting) for 137 Cambridge Terrace 'Commercial Building and Setting, Harley Chambers' Item No 78 and Setting No 309.
  - b. **Delete** changes to Rule 9.3.4.1.1 (P9) and proposed deletion of P11 and P12 and Matter of Discretion 9.3.6.1 proposed by PC13.
  - c. **Consequential amendments** to the planning maps to delete the notation for Heritage Listing and Setting as above from 137 Cambridge Terrace.
7. The specific relief is provided in **Attachment A**.

8. The reasons for the submission are that unless the relief sought in this submission is granted, then PC13, with respect to the Building and Setting at 137 Cambridge Terrace, will:
  - a. Not comply with the Council's obligations under the Resource Management Act 1991 (**RMA**);
  - b. Not promote the sustainable management of natural and physical resources;
  - c. Not be the most appropriate provision in terms of the protection of historic heritage from inappropriate subdivision, use and development in accordance with section 6(f) and section 5 of the RMA;
  - d. Not amount to the and promote the efficient use and development of resources;
  - e. Be inappropriate in terms of section 32 RMA.

### **Background and reasons**

9. Harley Chambers, 137 Cambridge Terrace is a three-level character building, with the northern portion originally dating from 1929, and the southern from 1934.
10. Until the 2011 earthquakes, the building was used for numerous small to medium size offices, primarily for medical and dental practice rooms.
11. The Canterbury earthquake sequence rendered the seismic compliance rating of the building at around 15% NBS.
12. The building has been unoccupied since February 2011, apart from a high level of vagrant and antisocial behaviour despite ongoing security efforts by the owner.
13. The building is notated as Significant in the Christchurch District Plan (Heritage notation 78 and setting 309) in the Christchurch District Plan.
14. LPL have owned Harley Chambers since 2001. LPL did not submit against the listing of Harley Chambers within the Christchurch District Plan as included as within the Stage 3 Proposal to the Christchurch District Plan.
15. LPL lodged a comprehensive resource consent to the Christchurch City Council in 2017 seeking to demolish Harley Chambers (and in connection with a partial retention of the adjoining Worcester Chambers) to facilitate a five-star Hotel complex. The application was withdrawn in 2018 given challenging world economic conditions, and the (then) staggered pace of Christchurch's recovery efforts.
16. The site location is shown on **Figure 1**. The southern elevation as taken from Worcester Boulevard is shown on **Figure 2**.



Figure 1: 137 Cambridge Terrace



Figure 2: Harley Chambers, Southern elevation. Photo facing north – Worcester Boulevard



17. Detailed assessments provided to the Council, associated with the 2017 Resource Consent application, identify the following:  
*Structural integrity*
18. The building has been assessed to have a seismic strength of 15% NBS, and is accordingly considered to be earthquake prone having a seismic strength of less than 34% NBS.
19. Critical structural weaknesses include:
  - Unreinforced brick parapets;
  - Unreinforced brick lift shaft above second floor level (partially deconstructed)
  - Unreinforced brick and bell block exterior walls.

- Severely damaged column at the north-eastern corner.

### *Historic Heritage*

20. Whilst there is no dispute of the pre-2011 heritage recognition of the building, overall, Harley Chambers is now only of “Some” and limited significance, given the combination of considerable alterations undertaken within the fabric of the building since its construction, the damage caused by Canterbury earthquake sequence, and also subsequent damage caused by squatters despite the considerable efforts by the building owners to exclude access.

### *Engineering*

21. Works to ensure a robust seismic rating of 66% NBS or above are feasible in terms of engineering solutions. However, these solutions as identified are extremely invasive upon existing residual heritage fabric.

### *MBIE - Earthquake Prone Register*

22. In December 2017 MBIE added Harley Chambers to the register of Earthquake Prone Buildings (**EPB Register**) with a recorded earthquake rating of 0% to less than 20%. The deadline for completing seismic work on the notice is 14 June 2025.

### *Costs of Repair (2017)*

23. The costs of the structural repair of Harley Chambers to increase its seismic rating are estimated as follows: to 34% of the required New Building Standard (NBS) \$12.8 million; to 67% of NBS, \$17.070 million; and to 100% of NBS \$18.790 million.
24. In this context it is important to note that the Independent Hearings Panel on the Christchurch District Plan raised concerns with the Council’s approach to the Statements of Significance and associated listings in **Appendix 9.3.7.2**.
25. In Decision 45 which resolved the Heritage Provisions of the Christchurch District Plan, the Independent Hearings Panel (**IHP**) raised issues as to the Council’s notified provisions associated with protection of Historic Heritage<sup>1</sup>. In particular, concern was raised as to the manner in which the notified objectives and policies did not take proper regard of the *“the impacts of the Canterbury earthquake sequence, the financial costs of repair and reconstruction of heritage items, and related to that, the engineering complexity of repair, reconstruction and seismic strengthening.”*
26. The IHP also released a Minute leading up to Decision 45<sup>2</sup>. The relevant consideration to this issue is:

*[17] In addition, the Council’s s32 evaluation did not involve any structured or formal evaluation, in consultation with landowners, or engineering feasibility and / or financial or economic viability issues. As we shortly address, the evidence we have heard on those matters for various submitters has informed our view that several listings should be deleted or modified. However, we have only had insight into a small sample of listings brought to our attention by submitters. Given the various considerations we have noted, this significant weakness in the listings in the Notified Proposal needs to be addressed in both policies and rules so as to ensure all landowners (whether or not submitters) will have a fair capacity for relief. We return to this matter shortly.*

<sup>1</sup> IHP Decision 45 – Paragraph 32.

<sup>2</sup> Hearing Panel Minute Regarding Topics 9.1 – 9.5, 22 February 2016.

*[18] Those problems have their consequences for the Notified Proposal. One consequence concerns the reliability or otherwise of the heritage list in the Notified Proposal, given the quality control matters we have identified...*

27. Decision 45 then states:

*[63] We have also included express acknowledgement that in some situations demolition of heritage items is appropriate. This is now expressly recognised in the provisions through recognition of financial and engineering factors and is consistent with our findings to s6(f), discussed at [10] – [15] above.*

*[99] We find that there is no statutory presumption that 'demolition' will be inappropriate, or that it requires avoidance in an absolute sense. In the Christchurch recovery context, there is a need for overall flexibility in the appropriate management of historic heritage. Policy 9.3.2.9 does not sit alone. It is one of the matters that sits under Policy 9.3.2.4. We find that the list of matters in Policy 9.3.2.9, are relevant considerations for ensuring whether demolition is appropriate. On the evidence we find the listing of these matters is particularly important for the proper consideration of applications for complex restoration or rebuilding projects involving historic heritage. As we discuss below in the context of Christchurch Cathedral, demolition can take a number of forms. It does not always mean the loss of an entire building to make way for a new and modern building. There are a range of factors that affect how much demolition is required. All of those matters are recognised in the Final Revised Version. However, we find that the policy still inappropriately framed these factors as 'exceptions', notwithstanding the Council's movement away from the phrase 'exceptional circumstances'. In the Christchurch context, we find that there should be no presumption that 'demolition' is inappropriate or that it must be avoided, or only allowed in limited circumstances.*

28. The relevance of these matters to this submission is that whilst LPL did not 'test' the listings during the Proposed District Plan process by lodging a submission then, LPL with the analysis gained through its 2017 resource consent application considers that the Statement of Significance for 137 Cambridge Terrace is fundamentally flawed and cannot be justified. The inclusion of the Building on the MBIE EPB Register with seismic works or demolition to be completed by June 2025 would result in the further loss of residual heritage fabric of significance, and require an extensive and costly resource consent application. Accordingly, retaining Harley Chambers within **Appendix 9.3.7.2** cannot be considered as the more appropriate provision in terms of achieving the purpose of the RMA.

29. Accordingly, Plan Change 13 which is broadly set in terms of Historic Heritage, including the listing and delisting of a number of buildings from **Appendix 9.3.7.2** provides an appropriate mechanism whereby the Christchurch City Council, as informed by the 2017 assessment should have reconsidered and updated the technical inputs into the Schedule of Significance for 137 Cambridge Terrace, with the resultant delisting of the building and setting.

30. The purpose of this submission is to engage in the formal process to seek that delisting.

31. LPL also wishes to reserve its position to make further representations either by way of Further Submissions or should the provisions of PC13 alter or evolve through the course of the plan change process.

32. LPL wishes to be heard in support of this submission.

33. If others make a similar submission, LPL would consider presenting a joint case with them at the hearing.

**DATED** at Christchurch this 22nd day of May 2023

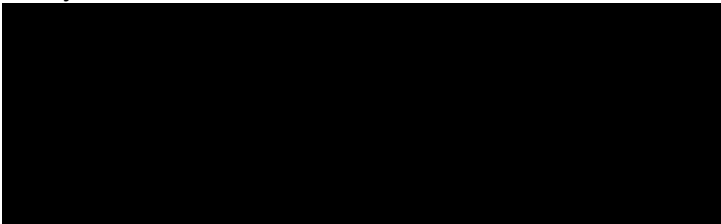


.....

Signature of person authorised to sign on behalf of Lee Pee Limited

Address for service of submitter:

Lucy de Latour  
Wynn Williams





## Attachment A

ID	Section of Plan	Support/ Support in Part/Oppo se	Reasons	Relief Sought																							
Chapter 9 - Appendix 9.3.7.2.																											
1.	Appendix 9.3.7.2.  Schedule of Significant Historic Heritage	Oppose	As set out above. The Statement of Significance is fatally flawed and does not allow for damage and loss of function as a consequence of the Canterbury Earthquake sequence.	<table><tr><td>137</td><td>Cambridge Terrace</td><td>Central City</td><td>Commercial Building and Setting, Harley Chambers</td><td>78</td><td>309</td><td>Significant</td><td>3111</td></tr><tr><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td>Category 2</td></tr></table>								137	Cambridge Terrace	Central City	Commercial Building and Setting, Harley Chambers	78	309	Significant	3111								Category 2
137	Cambridge Terrace	Central City	Commercial Building and Setting, Harley Chambers	78	309	Significant	3111																				
							Category 2																				
2.	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	Oppose	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.	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.																							

ID	Section of Plan	Support/ Support in Part/Oppo se	Reasons	Relief Sought
			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.	
3.	<b>Plan Maps</b>	Oppose	Consequential amendments to Heritage notations removing the listing from <b>Appendix 9.3.7.2.</b>	<b>Delete</b> the notation of a Heritage Listing and Setting from the Planning Maps for 137 Cambridge Terrace.

# Our proposed Housing and Business Choice and Heritage Plan Changes (13 &14)

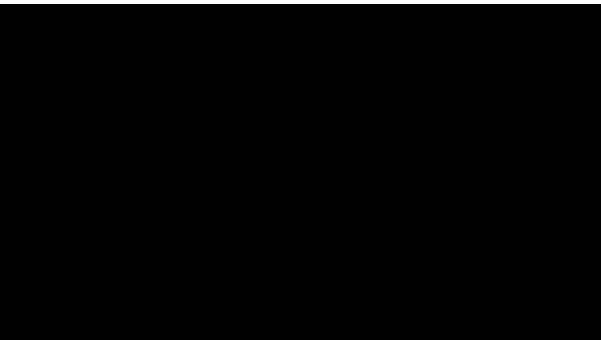
## Submitter Details

**Submission Date:** 12/05/2023

**First name:** Brendon **Last name:** Liggett

**Organisation:** Kāinga Ora – Homes and Communities

**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
kaingaora
KaingaOra_CCCPC14Submission_CityCentre



12<sup>th</sup> May 2023

Attn: Mark Stevenson  
Planning Manager  
Christchurch City Council  
Po Box 73016  
Christchurch

*Submission lodged via email: [engagement@ccc.govt.nz](mailto:engagement@ccc.govt.nz)*

**KĀINGA ORA – HOMES AND COMMUNITIES SUBMISSION ON A NOTIFIED  
PROPOSAL FOR PLAN CHANGE 14 UNDER CLAUSE 6 OF SCHEDULE 1 OF THE  
RESOURCE MANAGEMENT ACT 1991**

**This is a submission on Plan Change 14 – Housing and Business Choice (“PC14”) from Christchurch City Council (“the Council” on the Operative Christchurch District Plan (“the Plan”).**

Kāinga Ora does not consider it can gain an advantage in trade competition through this submission. In any event, Kāinga Ora is directly affected by an effect of the subject matter of the submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

**The specific provisions of the proposal that this submission relates to:**

PC14 in its entirety.

**This document and the appendices attached is Kāinga Ora submission on PC14.**



**The Kāinga Ora submission is:**

1. Kāinga Ora Homes and Communities (“Kāinga Ora”) is a Crown Entity and is required to give effect to Government policies. Kāinga Ora has a statutory objective that requires it to contribute to sustainable, inclusive, and thriving communities that:
  - a) Provide people with good quality, affordable housing choices that meet diverse needs; and
  - b) Support good access to jobs, amenities and services; and
  - c) Otherwise sustain or enhance the overall economic, social, environmental and cultural well-being of current and future generations.
2. Because of these statutory objectives, Kāinga Ora has interests beyond its role as a public housing provider. This includes a role as a landowner and developer of residential housing and as an enabler of quality urban developments through increasing the availability of build-ready land across the Canterbury Region, including Christchurch City.
3. Kāinga Ora therefore has an interest in both PC13 and PC14 and how they:
  - a) Gives effect to the National Policy Statement on Urban Development (“**NPS-UD**”) and The Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (“**the Housing Supply Act**”);
  - b) Minimises barriers that constrain the ability to deliver housing development across public housing, affordable housing, affordable rental, and market housing; and
  - c) Provides for the provision of services and infrastructure and how this may impact on the existing and planned communities, including Kāinga Ora housing developments.
4. Kāinga Ora supports the general direction and intent of Plan Change 14, especially to the extent that this suite of plan changes is more enabling of residential and business development capacity compared to the Christchurch City Council Operative District Plan.

In particular, Kāinga Ora supports:

- a) The recognition of the need for well-functioning urban environments (consistent with the direction set out in the National Policy Statement on Urban Development 2020 (“**NPS-UD**”);
- b) The provision of medium density housing in most existing residential areas across the city, which is consistent with the requirements of the Resource Management (Enabling Housing Supply) Amendment Act 2021 (“**the Amendment Act**”);
- c) The recognition of the need to provide sufficient development capacity to meet long term demands for housing and business land;
- d) The need to manage significant risks from natural hazards;
- e) The promotion of a compact urban form and residential intensification in Christchurch City;
- f) The provision for enabling medium to high density residential development within a walkable catchment of the City Centre and larger Commercial Centres; and
- g) The provision of a range of commercial and mixed-use environments which will provide for and support urban development across Christchurch City.

5. The Kāinga Ora submission seeks amendments to PC14 in the following topic areas:

### ***Qualifying Matters***

- a) Kāinga Ora could support the qualifying matters, subject to amendments and clarifications as sought in the submission with the exception of: Low Public Transport Accessibility, Key Transport Corridors, Sunlight Access, Residential Heritage Areas, Character Areas, the Christchurch International Airport Noise Influence Area, Industrial Interfaces, and Open Space Areas which are opposed in full by Kāinga Ora for the reasons included in **Appendix 1**.
- b) Kāinga Ora considers that qualifying matters need to be expressed more clearly across PC13 and PC14 to assist with plan administration and interpretation. For example, having some of the Heritage Area provisions being contained in PC14 and following an IPI process i.e. the built form standards. Whilst other Heritage Area provisions are being progressed through a separate PC13, and following a first schedule process i.e. Heritage Area policies has created efficiency issues.

- c) Kāinga Ora opposes the proposed introduction of certain new qualifying matters through the IPI process because doing so in this instance (having regard to the nature of the particular qualifying matters concerned) goes beyond the scope of the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021. The concerns about the use of the IPI process for this purpose was highlighted in the recent Environment Court's decision of *Waikanae Land Company Limited v Heritage New Zealand Pouhere Tāonga [2023] NZEnvC 056*. As noted in that case, if a Council wishes to implement other changes to its district plan, then there is the usual First Schedule process that can be adopted, with that process containing the appropriate safeguard of a full appeal to the Environment Court.

### **Residential Heights**

- d) Kāinga Ora supports the application of a Medium Density Residential Zone (MRZ) across all relevant residential zones. It also supports the introduction of High Density Residential Zone (HRZ) around the edge of the City Centre and where located in close proximity to larger commercial centres. The extent of HRZ is sought to be increased in the Riccarton area given the scale of the Riccarton commercial centre and proximity to the University of Canterbury activity hub. In addition to the increased spatial extent of HRZ being sought, Kāinga Ora submits that the heights and centre hierarchy be simplified, with greater enablement of taller buildings provided.
- e) Further to this, Kāinga Ora seeks that a Height Variation Control overlay of 36m be applied 1.20km from the edge of the City Centre Zone and the three Metropolitan Centre Zones as sought below.

### **Metropolitan Centre Zoning**

- f) Kāinga Ora seeks the introduction of a new 'Metropolitan Centre Zone (MCZ) in the Plan to replace the Riccarton, Papanui, and Hornby Town Centre Zones to recognise the broader catchment these centre serve, both currently and to account for future growth of the residential catchment. The existing size, scale and function of these centres are such that they merit the application of a MCZ classification, with appropriate objectives, policies and rules framework. A MCZ chapter is sought and is attached in **Appendix 2**. Further, recent and proposed investment in public and active transport modes along the corridors in which these activity centres are located, support the case for a zoning classification reflective of their relative position within the centres hierarchy.

### ***Industrial Interface, Industrial General, and Commercial Mixed Use proposals***

- g) Kāinga Ora submits that the Industrial Interfaces qualifying matter and associated policies, and rules are deleted, and that the purported effects are managed, where necessary through noise controls and acoustic and ventilation requirements as opposed to the proposed density controls.
- h) In reviewing the locations that the Industrial Interface qualifying matter applies in the preparation of this submission, Kāinga Ora notes that the current function of many industrial general zone areas, that are located in primarily residential areas, would no longer meet a definition of 'industrial activity'. Kāinga Ora question if this zoning may no longer be appropriate for these locations and if an application of a commercial mixed use zone may be more appropriate; as has been proposed in PC14 for Sydenham.
- i) Similarly, in relation to the rules that have been proposed in commercial mixed use zone boundary changes in areas adjacent to the central city i.e. Sydenham and Phillipstown, Kāinga Ora express concern that the approach taken will not achieve the outcomes sought. Kāinga Ora proposes that the existing zoning remains and a schedule 1 process is followed, including structure planning and use of appropriate planning methods. This may also provide the Council with opportunities to support these changes through the Long Term Plan.

### ***General Feedback***

- j) Kāinga Ora submits that changes to policies, rules and matters of discretion are necessary to better reflect the requirements and intent of the 'the Housing Supply Act' and NPS-UD. Kāinga Ora considers that PC14 is not currently appropriately framed to recognise that as the character of planned urban areas evolves to deliver a more intensive and compact urban form, amenity values will change. Amendments are sought to ensure this is reflected more consistently throughout the provisions, in language that is consistent with the NPS-UD.
- k) The Kāinga Ora submission seeks changes to rules to address errors, to align with Schedule 3A of the Housing Supply Act, or to reduce duplication where the standards introduced via Schedule 3A overlap with District Plan provisions that are not proposed to be deleted.



- l) The Kāinga Ora submission seeks amendments to objectives, policies, rules and matters for discretion / assessment criteria - for improved clarity, effectiveness and focus on the specific resource management issue / effect to be addressed. Further, The scope and extent of assessment matters provide such broad discretion that they undermine the 'Housing Supply Act's' intent of a restricted discretionary activity status.
  - m) The submission seeks such further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission above and in **Appendix 1**.
6. The changes requested are made to:
- a) Ensure that Kāinga Ora can carry out its statutory obligations;
  - b) Ensures that the proposed provisions are the most appropriate way to achieve the purpose of the Resource Management Act 1991;
  - c) Reduce interpretation and processing complications for decision makers so as to provide for plan enabled development;
  - d) Provide clarity for all plan users; and
  - e) Allow Kāinga Ora to fulfil its urban development functions as required under the Kāinga Ora–Homes and Communities Act 2019.
7. The Kāinga Ora submission points and changes sought can be found within Table 1 of Appendix 1 which forms the bulk of the submission.
8. A Metropolitan Centre Zone chapter is sought and included in **Appendix 2**.
9. Mapping changes sought are included in **Appendix 3**.

**Kāinga Ora seeks the following decision from Christchurch City Council:**

That the specific amendments, additions or retentions which are sought as specifically outlined in this letter and **Appendix 1-3**, are accepted and adopted into PC14, including such further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.

**Kāinga Ora wishes to be heard in support of their submission.**

Kāinga Ora seeks to work collaboratively with the Council and wishes to discuss its

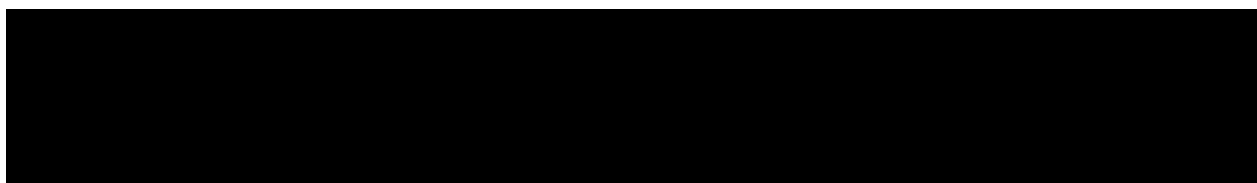
submission on PC14 to address the matters raised in its submission.

A handwritten signature in black ink, appearing to be 'BL', written over a horizontal dotted line.

**Brendon Liggett**

**Development Planning Manager**

**Kāinga Ora – Homes and Communities**



## Appendix 1: Decisions sought on PC14

The following table sets out the amendments sought to the PC14 and also identifies those provisions that Kāinga Ora supports.

*Proposed changes are shown as ~~strikethrough~~ for deletion and underlined for proposed additional text.*

Table 1

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
<b>Zone Boundaries/ Mapping</b>					
1.		Planning maps	Support in Part	<p>Kāinga Ora support the implementation of a Medium Density Residential Zone (MRZ) over all relevant residential zones. As set out in this submission, Kāinga Ora oppose the Public Transport Accessibility Qualifying Matter (QM) and the Airport Noise Influence Area QM and therefore seek as a consequence of deleting these QMs that the RS and RSDT zoned areas within these QMs be rezoned to MRZ.</p> <p>Kāinga Ora note some ambiguity in the provisions as to whether the land that is subject to the Tsunami Risk QM is intended to be zoned MRZ or RS/ RSDT. Whilst agreeing that a high risk of natural hazards is a legitimate QM, our</p>	<ol style="list-style-type: none"> <li>1. Retain MRZ over areas where MRZ is proposed in PC14 as notified unless otherwise changed by this submission.</li> <li>2. Rezone to MRZ areas that are proposed as RS/ RSDT zones under the Public Transport Accessibility and Airport Noise Influence Area QMs.</li> <li>3. Rezone Lyttelton to MRZ.</li> <li>4. Rezone Papanui, Riccarton and Hornby Key Activity Centres to Metropolitan Centre Zone (MCZ) from Town Centre Zone and Large Format Retail Zone.</li> <li>5. Rezone to HRZ areas that are proposed as MRZ within a Local Centre Intensification Precinct and remove the precinct.</li> <li>6. Retain HRZ over areas where HRZ is proposed in PC14 as notified unless otherwise changed by this submission.</li> </ol>



ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>submission raises concerns with whether the costs and benefits of this QM strike an appropriate balance, and question the appropriateness of using a threshold of a 1:500 year event plus a 1m rise in sea levels as the mapping base. Use of a lower density RS/ RSDT zoning should only be used where the risk of hazards is proven to be high and with a high return period.</p> <p>The areas subject to the 'Local Centre Intensification Precinct' are sought to be rezoned from MRZ to HRZ and the precinct overlay deleted. These areas are ideally located adjacent to medium-sized commercial centres that provide residential activities with easy access to a wide range of services and are also generally well serviced by public transport. As such, a HRZ is considered to be more appropriate and better aligned</p>	<p>7. Remove the Large Local Centre Intensification Precinct and replace with HDZ.</p> <p>8. Extend the boundary of HRZ in the Riccarton area as shown in the maps attached to this submission in <b>Appendix 3</b>.</p> <p>9. Delete the various height/ intensification precincts and replace with a single 'Height Variation Control' precinct to reflect the 36m height limit sought in the submission for the HRZ adjacent to the City Centre, Hornby, Riccarton, and Papanui centres as shown in the maps attached to this submission within <b>Appendix 3</b>.</p> <p>Generally these are:</p> <ul style="list-style-type: none"> <li>- 22m HDZ 1.20km from the edge of the new MCZ and the CCZ.</li> <li>- 36m Height Variation Overlay 400m from the edge of the new MCZ and CCZ.</li> </ul>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>with NPS-UD and National Planning Standard outcomes.</p> <p>Kāinga Ora submits that Metropolitan Centres be employed within the centres hierarchy. Kāinga Ora seeks that this covers the existing key activity areas for Riccarton, Papanui, and Hornby.</p> <p>Kāinga Ora support the inclusion of a HRZ in appropriate locations close to the City Centre, Metropolitan and larger suburban commercial centres. The zone boundaries for the HRZ is supported, with the only exception being in the Riccarton area where an extension of the HRZ boundaries are sought to better recognise the proximity of this area to a wide range of commercial services, university activity node, high frequency public transport, cycle ways, and the relief sought in the submission opposing the</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>Riccarton Bush, Industrial Interface, Airport Influence Density Precinct, and Piko/Shands heritage area and character area QMs. Noting also the recommendation that Kāinga Ora has suggested in relation to amendments to the Industrial General Zoning at 247 Riccarton Road and 37 Euston Street.</p> <p>Kāinga Ora seeks to rationalise and simplify the height limits applicable to the HRZ, depending on the size of the adjacent commercial centre. Consequential amendments are therefore required to the various height/ intensification precincts to reflect the outcomes sought in the submission.</p>	
<b>Chapter 3 - Strategic Directions</b>					

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
2.	3.3	Objective 3.3.3 – Ngāi Tahu mana whenua	Support in Part	<p>The proposed amendment to clause (a)(ii) is supported.</p> <p>This objective is sought to also include explicit reference to enabling the ability of mana whenua to establish Papakāinga/Kāinga Nohoanga as an important tool in meeting their well-being and prosperity as sought in the amendment.</p>	<p>1. Amend clause (a)(ii) as follows:</p> <p>Ngāi Tahu mana whenua's <del>aspirations to actively participate</del> <b><u>priorities for their well-being and prosperity are recognised and provided for</u></b> in the revitalisation of Ōtautahi, <b><u>including the provision of Papakāinga/Kāinga Nohoanga are recognised</u></b>; and</p>
3.	3.3	Objective 3.3.4 – Housing bottom lines and choice	Support	Support the proposed reference to Papakāinga/Kāinga Nohoanga as a new clause (b)(ii).	Retain clause (b)(ii) as notified.
4.	3.3	Objective 3.3.7 – Well functioning urban environment	Support in Part	<p>Clause (a) implements legislative requirements and is supported. The balance of the objective is likewise supported, with the exception of clause (a)(i)(A) which confuses urban form with landscape outcomes and adds little meaningful value to the objective.</p> <p>Clause (a)(E)(iii) relating to mana whenua must include</p>	<p>2. Retain the objective as notified, except for:</p> <p>Delete clause (a)(i)(A)  <del>Contrasting building clusters within the cityscape and the wider perspective of the Te Poho-o-Tamatea/the Port Hills and Canterbury plains; and</del></p>



ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>explicit reference to Papakāinga/Kāinga Nohoanga.</p> <p>It is noted that the clause numbering/ formatting is unclear.</p>	<p>Amend clause (a)(E)(iii) as follows:</p> <ol style="list-style-type: none"> <li>1. The cultural traditions and norms of Ngāi Tahu mana whenua, <u>including the provision of Papakāinga/Kāinga Nohoanga</u></li> <li>2. Update clause numbering.</li> </ol>
5.	3.3	Objective 3.3.8 – Urban growth, form and design	Support in Part	<p>In line with our submission raising concerns that the proposed character area QM does not meet s32 requirements, in the event that the character area provisions are deleted, then existing clause (a)(ii) is also sought to be deleted.</p> <p>Similarly in line with our submission raising consistency of heights in local centres, and in line with concerns of the public transport access qualifying matter clause (a)(iv.)(A) is sought to be amended. The other amendments sought in PC14 to this objective are supported.</p>	<ol style="list-style-type: none"> <li>1. Retain objective as notified, except for the deletion of existing clause (a)(ii):   <del>Has its areas of special character and amenity value identified and their specifically recognised values appropriately managed; and</del></li> <li>2. Amend clause (a)(iv.)(A) as follows:   <u>in and around the Central City, Key Activity Centres (as identified in the</u>   <u>Canterbury Regional Policy Statement), Town Centre, and larger Local neighbourhood</u></li> </ol>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<u>centres, and nodes of core public transport routes; and</u>
6.	3.3	Objective 3.3.10 – Natural and cultural environment	Oppose	In line with our submission seeking the deletion of the tree canopy financial contribution rules, the related proposed reference to tree canopy in the strategic objectives is also opposed.	Delete proposed clause (a)(ii)(E):  <del>Tree canopy cover in areas of residential activity that maintains and enhances the city's biodiversity and amenity, sequesters carbon, reduces stormwater runoff, and mitigates heat island effects; and</del>
7.	3.3	Objective 3.3.13 - Infrastructure	Oppose	In line with our submission seeking the deletion of the Airport Influence Density Precinct and our concern that the Qualifying Matter does not meet s32 requirements, amend Clause (b.)(iii.)	Delete clause (b.)(iii.).
<b>Chapter 6 – Qualifying Matters</b>					
8.	Sites of Ecological Significance	6.1A Qualifying matters  Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards	Support	Kāinga Ora support the Sites of Ecological Significance, the Outstanding and Significant Natural Features, and the Sites of Cultural Significance qualifying matters, noting these	1. Retain the Sites of Ecological Significance qualifying matter.  2. Retain the Outstanding and Significant Natural Features qualifying matter.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
	<ul style="list-style-type: none"> <li>Outstanding Natural Features and Landscapes</li> <li>Sites of Cultural Significance (Wāhi Tapu / Wāhi Taonga, Ngā Tūranga Tūpuna, Ngā Wai and Belfast Silent File)</li> </ul>	<p>and/or intensification enabled under Policy 3.</p> <p>9.1.4.1.1 P1 Indigenous vegetation clearance.</p> <p>9.1.4.1.3 RD3 – RD6 Indigenous vegetation clearance.</p> <p>9.1.4.1.5 NC1 and NC3 Indigenous vegetation clearance.</p> <p>8.5.1.3 RD11 Subdivision of land.</p> <p>8.9.2.3 RD5 Earthworks.</p> <p>9.2.4.1 Table 1(a) – (d), (i), (o) – (s) Outstanding natural features and landscapes.</p> <p>9.5.4.1.3 RD3 – RD6 Wāhi Tapu / Wāhi Taonga.</p>		<p>are all relevant matters of national significance in Section 6.</p> <p>It is also noted that there is very little overlap between Sites of Ecological Significance and Outstanding Natural Features and Landscapes with existing residential zones.</p>	<p>3. Retain the Sites of Cultural Significance qualifying matter.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		8.5.1.3 RD11 Subdivision of land.  8.9.2.3 RD5 Earthworks.			
9.	Slope Hazard Areas	6.1A Qualifying matters  Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.  5.6.1 Slope Instability Management Area	Support	Kāinga Ora support the management of significant risks from natural hazards as a qualifying matter (in appropriate circumstances), noting that it is a matter of national significance in Section 6.  As slope hazards are less dynamic and have greater certainty as to their risk over time than flooding (submitted on below) and are not subject to constant change through hazard mitigation works, Kāinga Ora supports the Slope Hazard Areas qualifying matter.	Retain the Slope Hazard Areas qualifying matter.
10.	High Flood Hazard Management Area	6.1A Qualifying matters  Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards	Support in Part	Kāinga Ora supports a risk-based approach to the management of natural hazards, however, opposes the inclusion of further hazard	1. Amend the provisions to remove / delete the mapped Hazard Management Areas from within the District Plan and instead hold this information in non-statutory GIS maps.



ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
	<p>Coastal Hazard Management Areas</p> <p>Tsunami Management Area</p>	<p>and/or intensification enabled under Policy 3.</p> <p>5.4.5 Flood Ponding Management Areas</p> <p>5.4.6 High Flood Hazard Management Areas</p> <p>5.2.2.5.1 Managing development in Qualifying Matter Coastal Hazard Management Areas 5.4A.1 – 5.4A.6 Rules – Qualifying Matter Coastal Hazard Management Areas and Qualifying Matter Tsunami Management Area.</p> <p>5.2.2.5.2 Managing development within the Qualifying Matter Tsunami Management Area</p> <p>5.4A.1 – 5.4A.6 Rules – Qualifying Matter Coastal Hazard Management Areas</p>		<p>areas within the maps as part of the District Plan.</p> <p>Including Flood Hazard Areas in the District Plan ignores the dynamic nature of such hazards. Kāinga Ora accepts that it is appropriate to include rules in relation to these hazards but seeks that the rules are not linked to static maps.</p> <p>Other councils across the country adopt a set of non-statutory hazard overlay maps which operate as interactive maps on the respective Council's 'Geo Maps' website – a separate mapping viewer to the statutory maps. The advantage of this approach is the ability to operate a separate set of interactive maps which are continually subject to improvement and updates, outside of and without a reliance on the Schedule 1 process under the RMA. Kāinga Ora notes that there is no formal requirement for hazard</p>	<p>2. Reduce the Tsunami Management Area to a 1:100 year hazard.</p> <p>3. Amend and make consequential changes to give effect to this submission.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		and Qualifying Matter Tsunami Management Area		<p>maps to be included within a district plan.</p> <p>Kāinga Ora also has concerns that the proposed policy approach relating to the Tsunami Management Area is too conservative, noting that Policy 24 of the NZCPS requires identification of areas in the coastal environment that are potentially affected by coastal hazards (including tsunami) over at least 100 years.</p> <p>Kāinga Ora also considers that the Council's intent to retain Residential Suburban / Residential Suburban Density Transition zoning in the Tsunami Management Area is disproportionate based on the modelled return period.</p>	
11.	Historic Heritage, Residential Heritage Areas, and Residential	6.1A Qualifying matters  Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium	Support Historic Heritage.	Kāinga Ora generally supports the protection of areas of historic heritage where the requirements of Section 6 of the Resource Management Act	Delete the Residential Heritage Area qualifying matter and all proposed provisions.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
	Heritage Area Interface.	<p>Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>14.5.3.2.3 Building height - Residential Heritage Areas.</p> <p>14.5.3.2.7 Number of Residential Units Per Site - Residential Heritage Areas.</p> <p>14.5.3.2.8b, 8c Setbacks - Residential Heritage Areas.</p> <p>14.5.3.2.9 Building Coverage - Residential Heritage Areas.</p> <p>14.5.3.2.10c Outdoor living space - Residential Heritage Areas.</p>	Oppose Residential Heritage Areas.	<p>1991 ('RMA' or 'the Act') are met. However, Kāinga Ora opposes the new proposed Heritage Areas ('HAs') that are sought to be introduced under PC13 and PC14 in their entirety.</p> <p>Kāinga Ora does not consider that the proposed HAs meet the requirements of Section 6 of RMA to the extent that they should be accorded 'historic heritage' status of 'national' significance.</p> <p>Therefore, if these areas are considered to manage character (s7 RMA), rather than protect heritage, Kāinga Ora considers that a more nuanced assessment of costs and benefits applies to areas with a high proportion of Kāinga Ora housing, such as the proposed Piko/Shands character and heritage areas (i.e. the benefits of providing a greater number of houses for the most vulnerable members of society,</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>particularly in an area that has historically been used for social housing, are greater than retaining the character associated with existing housing per se, and therefore the character or heritage values of such locations must be carefully weighed to test the heritage values are existent and sufficiently so that they outweigh the social costs of lost development opportunity. We do not believe this test has been met.</p> <p>A more nuanced assessment of costs and benefits is likewise required for heritage areas in locations that are otherwise ideally located for further intensification, such as the heritage areas within and adjacent to the central city/ Four Avenues. Piko/ Shands is located in close proximity to both Riccarton and Church Corner commercial centres as well as an emerging high frequency public transport</p>	



ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>corridor along Riccarton Road and a new major cycle way network. Were it not for the heritage and character area overlays, the Piko/ Shands area would merit a High Density zoning/ height limits.</p> <p>The imposition (costs) of character controls in locations that would otherwise suit high density housing must therefore be greater than the costs applying to character areas more generally. It follows that the benefits of such regulation and the identification of these areas as Qualifying Matters must therefore be greater than the benefits generally in order to justify additional regulation.</p> <p>It is further noted that having some of the Heritage Area provisions being contained in PC14 and following an IPI process i.e. the built form standards, and other Heritage Area provisions being progressed through a separate</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>PC13, and following a first schedule process i.e. Heritage Area policies has created efficiency issues.</p> <p>Consistency is sought with the Kāinga Ora submission on Plan Change 13 ("PC13"), which Kāinga Ora opposed the approach of establishing 'Historic Heritage Areas' in its entirety.</p> <p>Kāinga Ora is seeking the spatial application of residential zones to be applied across the City, regardless of the nature and extent of the current and proposed 'Heritage Areas' set out by Council in PC13. Kāinga Ora seeks the deletion of any proposed changes in PC14 that seek amendments to historic heritage and special character, consistent with the relief sought in PC13.</p> <p>Kāinga Ora considers that the proposed changes across PC13 and PC14 are not</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				qualifying matters, as the assessments in its view, do not meet the requirements under s6, s77I, s77J, s77K, and/or s77L of the RMA.	
12.	Significant and Other Trees (excluding those not identified as Qualifying Matters).	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>9.4.4.1.1 P1 – P12 Tree pruning, felling, earthworks.</p> <p>9.4.4.1.2 C1 Tree maintenance.</p> <p>9.4.4.1.3 RD1 – RD8 Tree pruning, felling, earthworks.</p> <p>9.4.4.1.4 D1 – D2 Tree pruning, felling 9.4.7.1 Appendix – Schedules of significant trees.</p>	Support in Part	<p>Kāinga Ora support the Significant and Other Trees qualifying matter.</p> <p>The rules in Chapter 9 of the District Plan sufficiently recognise and provide for the management of notable trees. Such rules provide a suitable framework for considering new buildings in proximity to notable trees, or their removal.</p> <p>Rule 9.4.4.1.1 P12 triggers the need for resource consent for earthworks within 5m of a street tree, however consent is always granted provided the works are undertaken by, or under the supervision of, a works arborist. The relief sought would reduce costs and the reliance on the resource consent process and is therefore more consistent</p>	<ol style="list-style-type: none"> <li>1. Retain Significant and Other Tree Qualifying Matter.</li> <li>2. Amend Rule 9.4.4.1.1 P12 as follows:</li> </ol> <p>Rule 9.4.4.1.1 P12 - Activities shall be undertaken by, or under the supervision of, a works arborist. <del>employed or contracted by the Council or a network utility operator.</del></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				with Objective 3.3.2.	
13.	Waterbody setbacks	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>6.6.4 City and Settlement Water Body Setbacks 6.6.4.1 – 6.6.4.4 Activities within water body setbacks</p>	Support in Part	<p>Section 6 seeks the preservation of rivers and their margins and their protection from inappropriate subdivision, use and development. Similarly, Section 6 also recognises and provides for the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, wāhi tapu, and other taonga.</p> <p>Kāinga Ora is supportive of these Section 6 matters being identified as a qualifying matter. However, where the identified waterbodies do not meet a Section 6 threshold, such as for 'Environmental Asset Waterways' and 'Network Waterways' use of waterway setbacks as a qualifying matter, Council needs to demonstrate why development that is otherwise permitted under</p>	Remove 'Environmental Asset Waterways' and 'Network Waterways' as qualifying matter, unless a site by site assessment has been undertaken that demonstrates why development that is otherwise permitted under MDRS is inappropriate.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>MDRS is inappropriate, for every specific waterway (and adjacent site) where a qualifying matter is proposed.</p> <p>The existing provisions in Chapter 6.6 of the District Plan are sufficient.</p>	
14.	Public Open Space areas; and  Ōtākaro Avon River Corridor.	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>18.4 to 18.96.1A Qualifying matters</p> <p>13.14 Specific Purpose (Ōtākaro Avon River Corridor) Zone – All provisions, including Appendix 13.14.6.2 specifying alternative zone provisions applicable to privately owned properties within the zone</p>	Oppose	<p>Kāinga Ora considers this qualifying matter is unnecessary and seek that it is deleted.</p> <p>While the use of areas for open space purposes is identified as a qualifying matter under RMA s77O(f), the areas zoned Open Space are owned by CCC and many are administered under the Reserves Act 1977. Council ownership, and Open Space zoning, makes it unlikely that these areas will be developed for medium density housing and such development would also be contrary to the purposes for which these sites were reserved. Further, the Housing Supply Act only requires CCC</p>	Delete the Open Space (recreation zone) qualifying matter and any relevant provisions proposed in its entirety.



ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		15.4.3.2.1 Maximum building height;  Appendix 15.15.1 Town Centre Zone (Belfast/Northwood) Outline Development Plan		to incorporate MDRS into every relevant residential zone (not Open Space Zone).  The s77O(f) matter is noted as being relevant for other councils where their District Plan does not include an Open Space zone and instead reserves often have a residential zoning.  As with the Open Space Zones, Kāinga Ora note that the Ōtākaro 'red zone' area has been subject to detailed place-based assessment, with large-scale residential development not anticipated in this area.	
15.	Residential Character Areas	6.1A Qualifying matters  Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.  14.5.3.1.1 P4 Conversion to two residential units –	Oppose in Part	Kāinga Ora support, in principle, the management of character as a qualifying matter. However, Kāinga Ora does not consider appropriate justification has been provided for the proposed new or extended 'character areas' set out in PC13 and PC14 to demonstrate that they contain specific characteristics that	<ol style="list-style-type: none"> <li>1. Delete all new or extended character areas as qualifying matters and undertake further analysis to determine the exact values of the resources that the Council seeks to manage in the District Plan.</li> <li>2. For existing character areas retain the controlled activity status for new buildings that exists in the Operative Plan - Rule 14.5.3.1.2 C1.</li> </ol>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		<p>Character Area Overlays</p> <p>14.5.3.1.2 C1 Character Area Overlays – new residential units to rear</p> <p>14.5.3.1.3, RD6, RD14 Area-specific rules and character overlays.</p> <p>14.5.3.2.3 Building height – Character Area Overlays.</p> <p>14.5.3.2.5 – 14.5.3.2.14 Built form rules – Character Area Overlays.</p> <p>14.15.27 Matters of discretion - Character Area Overlays.</p> <p>14.8.1.1 P18 – Conversion to two residential units –Lyttelton Character Area.</p> <p>14.8.3.1.1 P5 – Minor residential unit in Lyttelton Character Area or Lyttelton Residential Heritage Area.</p>		<p>make the level of development provided by the MDRS or policy 3 inappropriate in the area. Further, they blur the line between the protection of historic heritage values as set out under s6(f) of the RMA, and amenity values as set out under section 7 of the RMA. This is especially the case where both character and heritage area overlays apply to the same geographic area.</p> <p>Kāinga Ora questions the planning method and assessment undertaken to determine the proposed provisions.</p> <p>Kāinga Ora considers that any such provisions and values identified should be ‘managed’ rather than ‘protected’ in the District Plan. Kāinga Ora seeks the provisions as proposed are deleted and that further analysis is undertaken to determine the exact values of the resources that the Council</p>	<p>14.5.3.2.3 Building height – Character Area Overlays, and</p> <p>14.5.3.2.5 – 14.5.3.2.14 Built form rules – Character Area Overlays.</p> <p>3. In the event that the Character Area qualifying matter remains, explicit provision is sought for the ability to develop Papakāinga/Kāinga Nohoanga, noting that local Rūnanga have purchased the former Lyttelton West School Site.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		<p>14.8.3.1.2 C3 – New residential unit to rear Lyttelton Character Area.</p> <p>14.8.3.1.3 RD3 – Lyttelton Character Overlay – new buildings, alterations etc.</p> <p>14.8.3.1.3. RD5-RD7, RD9 – not meeting Lyttelton Character Area or Residential Heritage Area built form rules</p> <p>14.8.3.1.3 RD8, RD10 –not meeting Lyttelton Character Area built form rules.</p> <p>14.8.3.1.3 RD11 - Lyttelton Character Area or Lyttelton Residential Heritage Area – not meeting minor residential units rules.</p> <p>14.8.3.2.2 –14.8.3.2.6 Built form rules – Lyttelton Character Area or Lyttelton Residential Heritage Area.</p> <p>14.8.3.2.7 – 14.8.3.2.12 -Built form rules – Lyttelton Character Area only.</p>		seeks to manage in the District Plan.	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
16.	Electricity Transmission Corridors.	<p>6.1A Qualifying matters.</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>14.4.1.5 NC6 – NC7 National Grid transmission and distribution lines.</p> <p>14.5.1.5 NC2 – NC3 National Grid transmission and distribution lines.</p> <p>14.7.1.5 NC2 National Grid transmission and distribution lines.</p> <p>14.12.1.5 NC1 – NC2 National Grid transmission and distribution lines.</p>	Support	Kāinga Ora support this qualifying matter noting that the qualifying matter only relates to the National Grid Transmission Lines (nationally significant infrastructure) in accordance with s771(e) and no other lesser category of line.	Retain Electricity Transmission Corridors qualifying matter only to the extent of the corridor as defined in the NES ET.
17.	Airport Noise Influence Area	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the</p>	Oppose in Part	Kāinga Ora seeks that the Airport Noise Influence Area qualifying matter be deleted thus allowing all existing	Delete this qualifying matter and all proposed provisions.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		<p>level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>Safe or efficient operation of nationally significant infrastructure (Christchurch Airport)</p> <p>14.4.1 – 14.4.4, 14.13, 14.14 Low Density Residential Airport Influence Zone and Airport Influence Density Precinct.</p>		<p>residential zoned land within the Airport Noise Influence Area to be zoned Medium Density Residential as per the direction in the Act.</p> <p>While Kāinga Ora agrees that it is appropriate to protect strategic infrastructure (including Christchurch International Airport) from reverse sensitivity effects, it does not consider that restricting density under the Airport Noise Influence Area is necessary to avoid reverse sensitivity effects. Further, Kāinga Ora considers that the health, safety and amenity of existing and future residents living within the Airport Noise Influence Area would be appropriately maintained if the land was zoned Medium Density Residential. Any new buildings and additions to existing buildings located within the 55 dB Ldn air noise contour or the 55 dB Ldn engine testing contour would continue to be</p>	



ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				subject to the acoustic insulation standards set out at Rule 6.1.7.2.2 (Activities near Christchurch Airport) in the District Plan as required by Policy 6.1.2.1.5 b. ii. (Airport noise).	
18.	Lyttelton Port Influence Overlay	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>14.8.3.1.1 – 14.8.3.1.5 Area-specific rules - Lyttelton Port Influences Overlay</p>	Support	<p>Kāinga Ora support the Lyttelton Port Influence Overlay qualifying matter noting that the qualifying matter only relates to nationally significant infrastructure in accordance with s771(e).</p> <p>Kāinga Ora does not oppose the noise insulation standards.</p> <p>Kāinga Ora notes that the geographic area covered by the Port Influence Overlay is small and overlaps with a proposed Heritage Area. Furthermore, the Port is obliged to pay for the acoustic insulation of existing dwellings within the contour (Rule 13.8.4.2.7), so the scale, plus the costs and benefits, are markedly different between the</p>	Retain Lyttelton Port qualifying matter.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				Port Influence Overlay and the Airport Noise Influence Area qualifying matter.	
19.	NZ Rail Network Interface Sites.	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>6.1.7 Activities near infrastructure.</p> <p>14.4.1.3 RD28 and 14.4.2.7 Setback from rail corridor.</p> <p>14.5.1.3 RD12 and 14.5.2.7 Setback from rail corridor.</p> <p>14.8.1.3 RD16 and 14.8.2.4 Setback from rail corridor.</p>	Oppose	Kāinga Ora considers that the standard internal boundary setback for zones is appropriate.	Delete NZ Rail Network Interface Sites qualifying matter.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		14.12.1.3 RD13 and 14.12.2.5 Setback from rail corridor.			
20.	Radio Communication Pathways for the Justice and Emergency Services Precinct.	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>6.12 Radio communication Pathway Protection Corridors.</p>	Neutral	Kāinga Ora recognise the need to maintain radio communication for emergency services, and does not provide any further feedback.	Note: Table 1 in Chapter 6.1A references an abbreviation rather than the qualifying matter rule reference.
21.	Vacuum Sewer Wastewater Constraint Areas	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>8.9A Waste water constraint areas</p>	Support in Part	<p>Kāinga Ora recognise the need to ensure sufficient infrastructure is available to service developments.</p> <p>The Restricted Discretionary Activity status and the relevant matters of discretion are generally considered appropriate, however an additional matter of discretion that provides a consenting pathway for intensification in</p>	<p>Amend as follows:</p> <p>The Council's discretion shall be limited to the following matters:</p> <p><b><u>c. The ability to connect into any nearby non-vacuum wastewater system.</u></b></p> <p><b><u>d. The extent to which alternative waste water solutions are available that do not adversely affect the</u></b></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				these areas where infrastructure constraints can be addressed by alternative means is required.	<u>function of the Council's waste water systems.</u>
22.	Sunlight Access	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>14.5.2.6 – Height in relation to boundary,</p> <p>14.6.2.2 – Height in relation to Boundary, 14.15.2 – Diagram D.</p>	Oppose	Kāinga Ora oppose 'Sunlight Access' being a qualifying matter and considers this to be inconsistent with the requirements of Section 77L.	Delete the Sunlight Access qualifying matter and all associated provisions.
23.	Low Public Transport Accessibility.	<p>14.1 Introduction,</p> <p>14.2 Objectives and Policies,</p> <p>14.3 How to interpret and apply the rules, 14.4 Rules - Residential Suburban Zone and Residential Suburban Density Transition Zone, 14.7</p>	Oppose	Kāinga Ora opposes the 'Low Public Transport Accessibility' being a qualifying matter and considers this to be inconsistent with the requirements of Section 77L.	<ol style="list-style-type: none"> <li>1. Delete the Low Public Transport Accessibility Qualifying Matter and all associated provisions.</li> <li>2. Rezone all areas subject to this QM to MRZ.</li> </ol>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		Rules - Residential Hills Zone, 14.8 Rules - Residential Banks Peninsula Zone, 14.15 Rules - Matters of control and discretion, 14.16 Rules - Appendices – all as they apply to areas that are zoned Residential Suburban or Residential Hills, or in Lyttelton zoned Residential Banks Peninsula.		Kāinga Ora is particularly concerned to note the large areas with inadequate services in the eastern parts of the District, where the lack of such services has the potential to exacerbate existing social inequalities.	
24.	Industrial Interface	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>8.6.15 North Halswell – additional standards 8.7.13 North Halswell – additional matters – Medium and High Density Residential Zones in North Halswell 8.8.17 North Halswell – additional matters of discretion.</p>	Oppose	<p>Kāinga Ora considers that effects from industrial activities should first be mitigated at the source.</p> <p>The interfaces are already existing, with the Operative Plan having long zoned industrial areas adjacent to residential zones for light industrial activities. Invariably industry is required to meet residential zone standards relating to matters such as noise or glare at the zone boundary.</p>	Delete the Industrial Interface Qualifying Matter and all associated provisions.



ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				Given the existing requirements to comply with residential standards at the zone interface, combined with the General Industrial zone standards that limit heavy industry in these buffer locations, the QM setback is not considered to be appropriate with the benefits of the QM not outweighing the costs.	
25.	Riccarton Bush Interface	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>14.5.2.3 Medium Density Residential Zone – Building height.</p> <p>14.4.2.3 Residential Suburban Zone – Building height.</p>	Oppose	<p>Kāinga Ora considers that the existing long-established Operative Plan rules requiring a 10m building and earthworks setback from boundaries with the Bush are appropriate for managing potential interface issues/ impacts on tree health. The retention of the existing setback is quite different from the proposed QM which extends across roads and goes some distance from the Bush itself.</p> <p>The area around Riccarton Bush is ideally located for supporting a High Density</p>	<ol style="list-style-type: none"> <li>1. Delete the Riccarton Bush Interface Qualifying Matter and all associated provisions.</li> <li>2. The existing tree setbacks in Chapter 9.4 are retained.</li> </ol>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				Residential Zone given its close proximity to a Metropolitan centre, cycleways, high frequency bus routes, and the large university activity hub.	
26.	Key Transport Corridors – City Spine	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>14.5.2.18 – Spine Road setbacks.</p> <p>14.6.2.17 - Spine road setbacks.</p> <p>15.4.2.10 – spine corridor setbacks.</p> <p>15.5.2.10 Setback from corridor.</p>	Oppose	<p>Kāinga Ora oppose the ‘City Spine’ being a qualifying matter and considers this to be inconsistent with the requirements of Section 77L.</p> <p>The associated rules require buildings and outdoor living spaces to be set back from spine road corridors in both residential and commercial zones. In commercial zones there is a direct conflict in urban design outcomes (and rules) where the Key Pedestrian Frontage rules require buildings to be built up to the road boundary in order to deliver good urban design outcomes and facilitates a continuous street edge (often with veranda cover for pedestrians).</p>	Delete the Key Transport Corridors – City Spine Qualifying Matter and all associated provisions.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		<p>15.6.2.11 Setback from corridor.</p> <p>15.8.2.13 Setback from corridor.</p> <p>15.10.2.10 Setback from corridor.</p> <p>15.12.2.13 Setback from corridor.</p> <p>15.14.5.3 Matters of Discretion.</p>		<p>It is understood that the intention of the rule is to enable road widening in the future to accommodate public rapid transit. If Council's intention is to acquire land in the future to facilitate public works then it should use the designation powers available to it.</p> <p>Given the highly developed nature of these existing corridors with lengthy sections of commercial property built to the road boundary, it is unclear how any corridor-long road widening will occur without major land acquisition and demolition.</p>	
27.	Sites of historic heritage items and their settings (City Centre Zone) - Cathedral Square, New Regent Street, the Arts Centre.	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p>	Support	Kāinga Ora support the management of Historic Heritage as a qualifying matter, noting that Cathedral Square, New Regent Street and the Arts Centre contain individually listed heritage items and are within identified heritage settings. This is a matter of	Retain sites of historic heritage items and their settings (City Centre Zone) - Cathedral Square, New Regent Street, the Arts Centre.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		15.11.1.2 C2 Works at 100 Cathedral Square 15.11.1.3 RD9 Works at 100 Cathedral Square 15.11.1.3 RD11 buildings on New Regent Street, the Arts Centre, and in the Central City Heritage Qualifying Matter and Precinct 15.11.2.11 Building height in area-specific precincts		national significance in Section 6.	
28.	Belfast/Northwood Outline Development Plan Features	15.4.3.2.1 Maximum building height;  Appendix 15.15.1 Town Centre Zone (Belfast/Northwood) Outline Development Plan.	Neutral	Kāinga Ora does not have a view on this site-specific qualifying matter.	
<b>Chapter 5 – Natural Hazards</b>					
29.	5.5	Policy 5.2.2.5.1 – Managing development in Qualifying Matter Coastal Hazard Management Areas	Support in Part	Kāinga Ora support the management of significant risks from natural hazards as a qualifying matter (in appropriate circumstances), noting that it is a matter of national significance in Section 6.	Amend the policy as follows:  Within the following Qualifying Matters, development, subdivision and land use that would provide for intensification of any site shall be avoided, unless the risk is from coastal inundation and a site specific assessment demonstrates the

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>Kāinga Ora generally supports the risk based approach to the management of natural hazards but considers that the avoidance of intensification should be reserved to high risk from coastal inundation.</p> <p>Rule 5.4A.4 D1 requires resource consent for new buildings, other than accessory buildings, extensions etc, in areas shown on the planning maps as Qualifying Matter Coastal Hazard Medium Risk Management Area as a Discretionary Activity. Even with a site specific assessment however, Policy 5.2.2.5.1 seeks to avoid this.</p>	<p>risk is <u>medium</u>, low or very low based on thresholds defined in Table 5.2.2.5.1a below:</p>



ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
30.	5.5	Policy 5.2.2.5.2 - Managing development within Qualifying Matter Tsunami Management Area	Support in Part	<p>Kāinga Ora considers that the Council's intent to retain Residential Suburban / Residential Suburban Density Transition zoning in the Tsunami Management Area is disproportionate based on the modelled return period. This may be appropriate for 1:100 or 1:200, especially if such areas are also covered by high flood and/or coastal inundation risk overlays.</p> <p>Kāinga Ora seeks changes to the wording of Policy 5.2.2.5.2 to provide certainty of the outcomes intended, noting that the rule allows for up to four residential units to be constructed on these sites (Rule 14.4.1.1 P4, P5 and P6) so there is a disconnect between the use of the term 'avoid' and what the provisions would allow for as a permitted activity.</p>	<ol style="list-style-type: none"> <li>Amend Policy 5.2.2.5.2 as follows:  Within the Tsunami Management Area Qualifying Matter, <b>avoid discourage</b> development, subdivision and land use that would provide for intensification of any site, unless the risk to life and property is acceptable.</li> <li>Alternatively the Policy framework could be retained if the geographic extent of the QM matter is better aligned with a 1:100 return period or covers an area reflective of the Tsunami Inundation area identified by the Greater Christchurch Partnership as part of its consultation on the Greater Christchurch Spatial Plan.</li> </ol>
31.	5.4	Flood hazard provisions	Support in Part	Kāinga Ora seek that spatial identification of flood hazard	<ol style="list-style-type: none"> <li>Amend the provisions to remove / delete the mapped Hazard</li> </ol>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				management areas are made available through a set of non-statutory maps, which would operate as interactive maps on the Council's GIS website – thereby operating as a separate mapping viewer to the statutory District Plan maps. This approach is different to that of the traditional means of displaying hazard overlays on district plan maps and reflects that these maps do not have regulatory effect. The advantage of this approach is the ability to operate a separate set of interactive maps which are continually subject to improvement and updates, outside of and without a reliance on the Schedule 1 Resource Management Act 1991 process. Kāinga Ora notes that this is an approach taken by other Councils around the country.	<p>Management Areas from within the District Plan and instead hold this information in non-statutory GIS maps.</p> <ol style="list-style-type: none"> <li>2. Delete all references to maps within the District Plan.</li> <li>3. Undertake any consequential amendments to zones, overlays, precincts, and qualifying matters to reflect the relief sought in the submission.</li> </ol>
32.	5.4.1.3	Exemptions for daylight recession planes in the Flood Management Area	Support in Part	Kāinga Ora seeks for the applicable daylight recession planes in all residential zones to	Amend rules as follows:

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				be determined as if the ground level at the relevant boundary was the minimum floor level set in the activity specific standards in Rule 5.4.1.1, or natural ground level, whichever is higher.	<p>5.4.1.3 a. For P1 and P2 in Rule 5.4.1.1, the applicable daylight recession plane in residential zones <del>(other than in the Medium Density Residential Zone and High Density Residential Zone)</del> shall be determined as if the ground level at the relevant boundary was the minimum floor level set in the activity specific standards in Rule 5.4.1.1, or natural ground level, whichever is higher.</p> <p>5.4.1.3b. For P3 and P4 in Rule 5.4.1.1, the applicable daylight recession plane in residential zones <del>(other than in the Medium Density Residential Zone and High Density Residential Zone)</del> shall be determined as if the ground level at the relevant boundary was the minimum floor level specified in the Minimum Floor Level Certificate issued under Rule 5.4.1.2, or natural ground level, whichever is higher.</p> <p>5.4.1.3 c</p> <p><b>viii. Rule 14.5.2.6 Height in relation to boundary – Medium Density Residential Zone</b></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<b>ix. Rule 14.6.2.2 Height in relation to boundary – High Density Residential Zone</b>
33.	5.4A	Rules – Qualifying Matter Coastal Hazard Management Areas and Qualifying Matter Tsunami Management Area	Oppose in Part	Kāinga Ora seek that spatial identification of coastal hazard management areas be made available through a set of non-statutory maps, which would operate as interactive maps on the Council's GIS website – thereby operating as a separate mapping viewer to the statutory District Plan maps. This approach is different to that of the traditional means of displaying hazard overlays on district plan maps and reflects that these maps do not have regulatory effect. The advantage of this approach is the ability to operate a separate set of interactive maps which are continually subject to improvement and updates, outside of and without a reliance on the Schedule 1 Resource Management Act 1991 process. Kāinga Ora notes that this is an approach	<ol style="list-style-type: none"> <li>Delete all references in all rules in this section that refer to maps.</li> <li>Include a rule to provide for a Controlled Activity to subdivide within the Tsunami Management Area.</li> <li>Amend Rule 5.4A.5 NC3 as follows: <ol style="list-style-type: none"> <li><b>Development, subdivision and land use that would provide for residential intensification of any site within the Qualifying Matter Tsunami Management Area except that permitted or controlled in Rules 14.4.1 and 14.4.2.</b></li> </ol> </li> <li>Any consequential amendments to zones, overlays, precincts, and qualifying matters to reflect the relief sought in the submission.</li> </ol>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>taken by other Councils around the country.</p> <p>Rule 5.4A.5 NC3 makes development, subdivision and land use that would provide for residential intensification of any site within the Qualifying Matter Tsunami Management Area except that permitted or controlled in Rule 14.4.1 a non-complying activity.</p> <p>Rule 14.4.2 deals with controlled activities so the rule outlined above needs to be amended to reference Rule 14.4.2.</p> <p>There is no applicable rules in the subdivision chapter for the Tsunami Management Area.</p> <p>Rule 14.4.1 provides for up to four residential units to be constructed as a permitted activity. If this level of intensification is provided for, then having a non-complying</p>	



ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				activity status and an avoid policy seems nonsensical.	
<b>Chapter 6 – General Rules and Procedures</b>					
<b>6.10A – Tree Canopy Cover and Financial Contributions</b>					
34.	6.10A	<p>6.10A</p> <p>Rules 8.3, 8.5.1 and 8.7.12 - Subdivision;</p> <p>Rules 14.4.2 – 14.11.2 – Residential Built Form Standards.</p> <p>14.6.1.3 RD13.</p> <p>14.6.2.7 - Landscaping and tree cover.</p>	Oppose	<p>Kāinga Ora welcomes the Council's recognition of trees as a key element in successful urban environments.</p> <p>Kāinga Ora strongly support the Council increasing its prioritisation of the need to renew streetscapes, especially in areas where intensification has and will continue to occur. Such renewals should include kerb and channel replacement, undergrounding of overhead wires, and street tree planting.</p> <p>Kāinga Ora has substantial concerns with the 20% tree canopy cover target and considers it fundamentally</p>	Delete Section 6.10A and all associated provisions.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>unachievable in medium and high density environments on private land. Kāinga Ora consider the requirements to achieve 20% tree canopy cover is inconsistent with the spatial outcome requirements set out in the NPS-UD, and the Medium Density Residential Standard (MDRS) provisions of the Housing Supply Act.</p> <p>Kāinga Ora considers that the proposed financial contribution calculator is complicated and flawed, a simpler formula would be to require 1 tree to be planted per 100m<sup>2</sup> of site area, as an easier compliance threshold than a trigger of 10% of future canopy cover.</p> <p>It also has concerns with the reliance on Financial Contributions. Given that Council already own extensive areas of park and open space land (including several thousand hectares of land on</p>	

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				<p>the Port Hills and Red Zone), in addition to extensive road reserve and local park areas, and given that Council takes Development Contributions for new parkland as part of any new development, the need for the land component to form part of the financial contributions appears to be particularly hard to justify.</p> <p>The need to provide rapid canopy cover potentially creates a perverse incentive to plant faster growing exotic species rather than natives. The proposed Financial Contribution could therefore result in a decline in biodiversity by driving developers to plant exotics over natives, with attendant adverse biodiversity outcomes, which is contrary of the desire in the Urban Forest Plan to seek diversity in tree species.</p>	
<b>Chapter 8 – Subdivision, Development and Earthworks</b>					

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
35.		Policy 8.2.2.1 – Recovery activities	Support in Part	<p>PC14 seeks to delete this policy which provides for a range of intensification opportunities in the RS and RSDT zones.</p> <p>Deletion of this policy may well be appropriate if MRZ is properly implemented across all relevant residential zones and the Kāinga Ora submission opposing the Public Transport and Airport Noise Influence Area QMs is confirmed i.e. the only areas which retain low density RS/ RSDT/ RHZ zoning are those subject to a high risk of natural hazards.</p>	Delete the policy as notified.
36.		Policy 8.2.3.2 – Connections to infrastructure	Support	<p>PC14 proposes an additional clause (g) relating to development in the vacuum sewer area. This policy provides for development in the area if connection is able to be made to a part of the waste water system that is not part of the vacuum sewer, or if sufficient capacity can be demonstrated (which could be for example through -on-site</p>	Retain Clause (g) as notified.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				holding tanks and off-peak pumping into the network).	
37.		<p>Tree Canopy and Financial Contribution provisions:</p> <p>Objective 8.2.6 and associated policies;</p> <p>Clause 8.3.1(e)-(f) – how to apply to the rules</p> <p>Clause 8.3.3(b) – financial contributions</p> <p>Clause 8.3.7 – consent notices</p> <p>Clause 8.7.12 – Assessment matters</p>	Oppose	In line with our submission seeking the deletion of the tree canopy financial contribution rules, the related proposed references to tree canopy in the subdivision chapter policies and rules is also opposed.	Delete the provisions relating to the tree canopy financial contribution and associated tree canopy rules.
38.		8.4.1.1 - Notification	Support	Support clause (a)(i) that any controlled or restricted discretionary subdivision application shall not be publicly or limited notified.	Retain 8.4.1.1 as notified.



ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
39.		8.5.1.2 – Controlled activities – C8 and C9	Support	Support controlled activity status for the creation of vacant allotments (C8) or allotments containing an existing or consented dwelling (C9), where these allotments comply with density standards.	Retain C8 and C9 as notified
40.		8.5.1.3 – Restricted discretionary activities – RD2(c) and RD2A	Support	Support restricted discretionary activity status where the proposed allotments do not comply with C8 or C9.	Retain RD2(c) and RD2A as notified.
41.		8.6.1 – minimum dimensions	Oppose	<p>Support the use of a minimum dimension for the creation of vacant sections. However, Kāinga Ora recommends an 8m x 15m minimum shape factor for MRZ and HRZ sites as this is demonstrated as practicable to construct a permitted medium density residential dwelling.</p> <p>The rule needs clarification that the minimum sizes apply to the creation of vacant lots, rather</p>	<p>Amend clause 8.63.1(c) as follows:</p> <p><b><u>The creation of vacant allotments that do not contain an existing or consented residential unit Allotments</u></b> in the Medium Density (including MRZ Hills), and High Density Residential Zones, shall <del>have accommodate</del> a <b><u>minimum dimension shape factor</u></b> of <del>10m</del> 8m x 15m. <del>Within the Medium Density Residential (Residential Hills Precinct) Zone the allotment shall have a minimum dimension of 17m x 12m.</del></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>than lots with an existing or consented dwelling.</p> <p>Similarly clarity needs to be retained that is explicit that the minimum net site provisions shall not apply to sites used exclusively for access, reserves, or infrastructure, or which are wholly subject to a designation.</p>	<p><b><u>This shape factor shall be located outside of:</u></b></p> <ol style="list-style-type: none"> <li><b><u>1. Land which may be subject to instability or is otherwise geotechnically unsuitable;</u></b></li> <li><b><u>2. Any existing or proposed easement areas required for access or services purposes;</u></b></li> <li><b><u>3. Network Utilities, including private and public lines.</u></b></li> </ol>
42.		<p>Table 1 – Minimum net site area</p> <p>Clause (a) and (c)</p> <p>Table 6 – Allotments with existing or proposed buildings</p>	Oppose	Kāinga Ora opposes both Table 1 and Table 6 and consider that the minimum shape factor provision proposed above is more appropriate	Delete Table 1 and Table 6.
44.		<p>8.9.2.1 – Earthworks</p> <p>Table 9</p>	Support in Part	<p>Earthworks are permitted through rule 8.9.2.31(P1), provided they comply with the volumes specified in Table 9.</p> <p>Table 9(d) in the Operative Plan limits earthworks to no more</p>	Amend Table 9(d) so the maximum volume is <b><u>50m<sup>3</sup>250m<sup>3</sup>/ site net fill above existing ground level</u></b>

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				<p>than 20m<sup>3</sup> in all residential zones. Whilst these volumes do not include earthworks associated with a Building Consent i.e foundation construction, they are invariably triggered through the formation of driveways and landscaping. In practice, a 20m<sup>3</sup> limit is frequently triggered for low density suburban development let alone medium density outcomes. As an example a standard driveway for a single dwelling is 4m wide by say 30m long = 120m<sup>2</sup>. To build the driveway requires existing earth to be removed to a depth of 20cm, and then replaced with basecourse prior to being gravelled or asphalted. There is no change to existing ground levels. The cut is 24m<sup>3</sup> (120m<sup>2</sup> x 0.2m depth), with fill being the same, resulting in 48m<sup>3</sup>.</p> <p>The rule threshold is considered to be unrealistically low, such that it generates numerous consents that are</p>	

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				<p>invariably granted. The key effects that need to be controlled with earthworks are erosion and sediment control during construction (although the scale of such works means that they are generally completed within a couple of days and therefore do not generated significant risks of sediment discharge), and permanent changes to finished ground levels that would result in overlooking of neighbouring properties i.e. forming raised mounds or terraces.</p> <p>It is therefore sought that the rule be amended so the volume is net fill above existing ground levels. It is noted that filling within Flood Management Areas is separately controlled in Chapter 5.</p>	
<b>Chapter 12 - Papakāinga/ Kāinga Nohoanga Zone and Chapter 8 subdivision</b>					
45.	12.4.1 and 12.5.1	Activity status tables and built form rules	Support in Part	Kāinga Ora seek that the Papakāinga Zone be retained	Amend the Papakāinga/Kāinga Nohoanga Zone activity table and built

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				as a specific zone, given its unique policy outcomes and function. We seek that the MRZ built form rules however apply to the Papakāinga Zone. The activity status tables and built form standards are sought to therefore be amended to align with MRZ outcomes i.e. the Papakāinga Zone rules controlling matters such as height, boundary setbacks etc should simply align with those in the MRZ.	form standards to align with the built form rules in the MRZ.
46.	Chapter 8	Subdivision provisions relating to the Papakāinga/ Kāinga Nohoanga Zone	Oppose	The suite of subdivision provisions relating to minimum site sizes for the Papakāinga/ Kāinga Nohoanga Zone are sought to also be amended to align with MRZ outcomes.	Amend the subdivision standards for the Papakāinga/ Kāinga Nohoanga Zone to align with MRZ outcomes.
<b>Residential Zone Introduction and Policy Framework – 14.1-14.2</b>					
47.	Residential	14.1(e) Introduction to residential policies	Support in Part	Helpful statement for plan interpretation	Retain statement.  Amend reference at the end of the statement to "...subclause <b>g f</b> "



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48.	Residential	14.2.1 – Objective - housing supply	Support	Support amendments given that Christchurch has moved beyond the immediate earthquake recovery period. Support recognition that the community's housing needs may change, and that provision needs to take into account future needs.	Retain the objective
49.	Residential	Policy 14.2.1.1 – Policy – Housing distribution and density	Support in Part	<p>Support the amendments to clause (a)(ii) and (iii) that clearly state the expectation that high density residential development will be established in both the Central City and in and near identified commercial centres.</p> <p>By amending clause (iii) to now reference high density, the policy is now silent on the locations and expectation of medium density development. Given that the introduction of MRZ across most of the City, there is a need for a clear statement in the policy regarding what is now the normative housing density.</p>	<p>Retain clauses (a)(ii) and (iii).</p> <p>Add a new clause (a)(iv) as follows (with consequential renumbering of subsequent clauses):</p> <p><b><u>(iv) medium density residential development is established across the majority of the City unless precluded by a qualifying matter.</u></b></p>

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50.	Residential	Table 14.2.1.1a – Zone descriptions	Support	The proposed MRZ and HRZ descriptions align with the National Planning Standards descriptions.	Retain zone descriptions
51.	Residential	Policy 14.2.1.2 and 14.2.1.3	Support	Support deletion of these two policies as their original policy direction regarding the location of new medium density areas no longer aligns with the direction in the Enabling Act.	Support the deletion of these two policies.
52.	Residential	Objective 14.2.2 and associated policies 14.2.2.1-14.2.2.4 – short term recovery	Oppose	<p>Given that Christchurch is now some 12 years post-earthquake there may no longer be a need for these policies and associated mechanisms such as the 'Enhanced development mechanism' (EDM) and the 'Community Housing Redevelopment Mechanism'(CHRM).</p> <p>The housing opportunities and more enabling built form standards now provided through the MRZ and HRZ may make this suite of policies and short-term recovery tools unnecessary, however if the</p>	Delete Objective 14.2.2 and associated policies 14.2.2.1-14.2.2.4 and the associated EDM and CHRM in the event that the Public Transport accessibility QM is removed, and the Tsunami Hazard QM reduced to 1:100 year hazard.

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				QM are retained and large parts of the city retain RS or RSDT then the EDM and CHRM are sought to remain as important tools.	
53.	Residential	Objective 14.2.3 and associated policies 14.2.3.1-14.2.3.5 - MDRS	Support	The objective and associated policies align with the policies mandated in the Enabling Act.	<p>Retain the objective and associated policies.</p> <p><i>Note that sequentially Policy 5 (14.2.3.3) should come at the end i.e. the policy 'batting order' should be 1 to 5 rather than the current arrangement of 1,2, 5, 3, 4.</i></p>
54.	Residential	Policy 14.2.2.2 b. iv. (Recovery housing higher density comprehensive redevelopment)	Oppose	Provided the Airport Noise Influence Area qualifying matter is deleted, the reference in Policy 14.2.2.2 b. iv. to Christchurch International Airport is unnecessary given the relevant land will be zoned for medium density residential development.	<p>14.2.2.2 Policy - Recovery housing higher density comprehensive redevelopment</p> <p>a. Enable and incentivise higher density comprehensive development of suitably sized and located sites within existing residential areas, through an Enhanced development mechanism which provides:...</p> <p>iv. <del>Christchurch International Airport</del>, arterial traffic routes, and railway lines.</p>

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55.	Residential	Policy 14.2.3.6 – Framework for building heights	Oppose	<p>The policy does not provide a framework or rationale for the proposed heights and does not specify what the ‘specific conditions’ might be when taller buildings would be enabled.</p> <p>There is merit in having a policy that clearly articulates the building height hierarchy, with this hierarchy tied to proximity to commercial centres and the size / range of services provided in those centres.</p> <p>The requested amendments also reflect the Kāinga Ora position that Metropolitan Centres be employed within the centres hierarchy, as per the forward-looking aspects of the NPS-UD policies of 1, 3, and 6.</p> <p>These are sought to cover the existing key activity areas for Riccarton, Papanui, and Hornby. Furthermore, the higher density zoning around the city centre and metropolitan centres, are sought to extend</p>	<p>Delete policy and replace with the following:</p> <p><b><del>Enable building heights in accordance with the planned urban built character for medium and high density areas, whilst also enabling increased building heights under specific conditions.</del></b></p> <p><b><u>Encourage greater building height, bulk, form and appearance to achieve high density planned urban form when within the proximity of nearby commercial centres to deliver:</u></b></p> <p><b><u>a. At least 10 storey buildings within 1.2km of the Central City and the Metropolitan Centre zones in Hornby, Riccarton and Papanui;</u></b></p> <p><b><u>b. At least 6 storey buildings in proximity to town centres and medium and large local centres;</u></b></p> <p><b><u>c. At least 3-4 stories everywhere else in the MRZ.</u></b></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				for 1.20 km, with a 400m Height Variation Overlay of 36m sought within 400m of the edge of these centres.	
56.	Residential	Policy 14.2.3.7 – management of increased building heights	Oppose	<p>The MDRS has the height rule as a restricted dictionary activity. MDRS Policy 5 explicitly seeks to ‘provide for developments not meeting permitted activity status, while encouraging high quality developments’.</p> <p>Taller buildings are therefore anticipated as being potentially appropriate subject to a site-specific assessment of effects. The policy needs to properly reflect that taller buildings are anticipated in appropriate locations and where the specific design properly manages the effects generated by the increase in height. As written this policy directly conflicts with Policy 5 of Sub clause 6 of Schedule 3A RMA.</p>	<p>Delete the policy and replace it with:</p> <p><u><b>Within medium and high density zoned areas, increased building heights are anticipated where:</b></u></p> <p>i. <u><b>The site has good accessibility to is public and active transport corridors, public open space, and a town or local commercial centre; and</b></u></p> <p>ii. <u><b>The design of the building appropriately manages potential shading, privacy, and visual dominance effects on the surrounding environment.</b></u></p>



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				Taller residential buildings within 1.2km of the central city can only have a positive economic impact on the CBD by enabling more people to live within walking distance of the town centre. Given the large size of Christchurch, additional enablement of residential opportunities within 1.2km facilitates more people living near the centre i.e. it draws people in, rather than resulting in existing (or potential) CBD residents shifting out.	
57.	Residential	Policy 14.2.3.8 – fire fighting water capacity	Neutral		
58.	Residential	Objective 14.2.5 – high quality residential neighbourhoods	Support in Part	<p>Support the amendments to reference the planned urban character.</p> <p>References to ‘high’ quality in the title and the start of the objective will not always be appropriate or realistic. Use of language around ‘high standard’, ‘high level of amenity’, ‘spacious and</p>	<p>Amend the objective as follows:</p> <p><b>High Good</b> quality, sustainable, residential neighbourhoods which are well designed, <del>have a high level of amenity, enhance local character and reflect to reflect the planned urban character and</del> the Ngāi Tahu heritage of Ōtautahi.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				attractive pedestrian circulation', 'high levels of glazing' can be used to set a bar that can be unrealistically high (or at least is very subjective). Kāinga Ora support high quality outcomes, however such language is subjective and is an easy stick that can be used by NIMBY opponents to higher density. Invariably multi-unit development involves the balancing of competing design outcomes (which are all perfectly valid), and it comes down to how these are balanced and prioritised – it often isn't possible to tick the optimal outcome across every matter.	
59.	Residential	Policy 14.2.5.1 – Neighbourhood character, amenity, and safety	Oppose	The matters subject to this policy are either captured in the MDRS policies which set the anticipated outcomes for MDRS, or are better articulated through proposed Policy 14.2.5.3 relating to	Delete policy.

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				<p>developments of 4 or more units.</p> <p>Policy direction for the remaining low density residential environments is provided through Policies 14.2.5.6-9.</p> <p>This policy therefore duplicates directions which are already better articulated elsewhere in the policy framework</p>	
60.	Residential	Policy 14.2.5.2 – high quality medium density residential developments	Support in Part	<p>Support the amendments to reference the planned urban character.</p> <p>References to ‘high’ quality in the title will not always be appropriate or realistic.</p>	<p>Amend policy as follows:</p> <p>14.2.5.2 Policy – <b>High Good</b> quality, medium density residential development</p> <p>Encourage innovative approaches to comprehensively designed, <b>high good</b> quality, medium density residential development, which is attractive to residents, responsive to housing demands, and provides a positive contribution to its environment (while acknowledging the need for increased densities and changes in residential</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p>character) reflects the planned urban built character of an area, through:</p> <ul style="list-style-type: none"> <li>i. consultative planning approaches to identifying particular areas for residential intensification and to defining <b>high good</b> quality, built and urban design outcomes for those areas;</li> <li>ii. encouraging and incentivising amalgamation and redevelopment across large-scale residential intensification areas;</li> <li>iii. providing design guidelines to assist developers to achieve <b>high good</b> quality, medium density development;</li> <li>iv. considering input from urban design experts into resource consent applications;</li> <li>v. promoting incorporation of low impact urban design elements, energy and water efficiency, and life-stage inclusive and adaptive design; and</li> <li>vi. recognising that built form standards may not always support the best design and efficient use of a site for medium density development, particularly for larger sites.</li> </ul>

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61.	Residential	Policy 14.2.5.3 – quality large scale developments	Support in Part	<p>The policy is generally appropriate and captures the key design elements necessary to support the good design of more intensive residential complexes.</p> <p>As above, ‘good quality’ is considered to be a more appropriate term than ‘high quality’.</p>	<p>Amend the policy as follows:</p> <p>14.2.5.3 Policy – <del>Good</del> <b>gQ</b> quality large scale developments</p> <p>a. Residential developments of four or more residential units contribute to a <del>high</del> <b>good</b> quality residential environment through site layout, building and landscape design to achieve:</p> <ul style="list-style-type: none"> <li>i. engagement with the street and other spaces;</li> <li>ii. minimisation of the visual bulk of buildings and provision of visual interest;</li> <li>iii. a <del>high</del> <b>good</b> level of internal and external residential amenity;</li> <li>iv. <del>high</del> <b>good</b> quality shared spaces, including communal living spaces and accessways that provide safe, direct access for pedestrians;</li> <li>v. a safe and secure environment; and</li> </ul>



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					vi. public through connections for large sites with multiple public frontages.
62.	Residential	Policy 14.2.5.4 – On-site waste storage	Oppose	A policy is not necessary for this level of detail. The matters addressed by the policy are covered at an appropriate level in Policy 14.2.5.3 above.	Delete policy
63.	Residential	Policy 14.2.5.5 – Wind effects	Support in Part	While Kāinga Ora does not oppose the potential need for wind effects to be considered, the concern lays around appropriateness of Matters of Discretion, the proposed height limits triggering an assessment and technical expertise available to carry out these assessments or determine if assessments (or anticipated effects) are appropriate.	<ol style="list-style-type: none"> <li>1. Retain Policy 14.2.5.5, noting that Kāinga Ora has submitted on provisions relating to wind effects.</li> <li>2. Move all provisions relating to wind to sit under the General Rules.</li> </ol>

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64.	Residential	Objective 14.2.6 – Medium density residential zone	Oppose	The MDRS objective 2 and Policies 1-5 discussed above (objective 14.2.3 and associated policies 14.2.3.1-14.2.3.5) provide the policy framework for MDRS and as such this objective and associated policy are unnecessary	Delete the objective
65.	Residential	Policy 14.2.6.1 - MDRS	Oppose	As per comments on Objective 14.2.6	Delete the policy
66.	Residential	Policy 14.2.6.2 – local centre intensification precincts	Oppose	As discussed in the section on HRZ height limits, the proposed approach to heights and precincts is unnecessarily complicated. Local Centre Intensification Precincts are well-located for enabling more people to live in close proximity to a range of services. The area covered by this precinct is sought to be simply rezoned to HRZ, and as such this policy is no longer necessary and can be deleted.	<ol style="list-style-type: none"> <li>1. Delete the policy and associated Local Centre Intensification Precinct from the planning maps.</li> <li>2. As sought elsewhere in this submission, rezone the land within the Local Centre intensification Precinct to HRZ.</li> </ol>

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67.	Residential	Objective 14.2.7 and associated policies - HDRS	Neutral	It would thematically make more sense for these provisions to be located after the policies on MRZ, which would then lead into the policies on heights and design outcomes	Relocate the HRZ provisions so they are located after the suite of MRZ policies i.e. after Policy 14.2.3.5.
68.	Residential	Objective 14.2.7 and policies 14.2.7.1-14.2.7.3	Support	The objective and policies provide for higher density development in appropriate locations.	Retain the objective and policies.
69.	Residential	Policy 14.2.7.4 and Policy 14.2.7.5	Oppose	As set out elsewhere in this submission, the precinct approach is unnecessarily complicated. A simplified approach is sought through amendments to the HRZ height rules, with this rationalised approach to heights provided with appropriate policy support through Objective 14.2.7 and policies 14.2.7.1-14.2.7.3 (along with Policy 14.2.3.7 as sought to be amended above)	Delete the policies and the associated Large Local Centre Intensification Precincts and the High Density Residential Precincts.
70.	Residential	Policy 14.2.7.6 – High density development	Oppose	The requirement that sites be at least two stories in height may not be appropriate in a range of circumstances and is	Delete the policy.

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				<p>unnecessarily complex – there is significant theoretical capacity in these areas so maintaining design flexibility is more important than maintaining capacity.</p> <p>Whilst sites can be amalgamated, there is no requirement for amalgamation.</p> <p>It can be quite appropriate to locate building height and mass away from the road edge in high density environments, depending on site shape, size, orientation, and building design</p>	
71.	Residential	Objective 14.2.8 and policies 14.2.8.1 and 14.2.8.2 – Central City	Support	This Operative Plan objective and associated policies are proposed to be deleted in PC14. This deletion is supported as the policy direction is no longer appropriate, with the purpose of the HRZ near the central city better articulated through the proposed new replacement provisions in 14.2.8 and policies 14.2.8.1 and 14.2.8.2	Support the deletion of these provisions as shown in PC14 as notified.

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72.	Residential	Objective 14.2.8 – Future urban zone  Associated policies 14.2.8.1 to 14.2.8.7	Support in Part	<p>See comments elsewhere regarding zone labelling. The FUZ label has not been appropriately applied to existing greenfield urban zoned locations – existing urban zoned but unbuilt residential land are sought to be MRZ (unless appropriately justified QM apply). An example of just such an approach is the correct application of a HRZ around the emerging Halswell commercial centre where already zoned RNN land is yet to be built, but has a proposed HRZ applied. In the same way the balance of this RNN area is to have a MRZ applied rather than FUZ.</p> <p>Taking a consistent national view in the application of National Planning Standards, the FUZ zone label is only used in other District Plans for areas that are yet to have an operative urban zone. A FUZ is a 'holding zone' that identifies where medium to long term urban growth is anticipated.</p>	<ol style="list-style-type: none"> <li>Delete references to FUZ and relabel existing urban zoned but undeveloped residential land as MRZ (or HRZ if appropriately located proximate to a large commercial centre).</li> <li>Retain the 14.2.8 section as it provides useful direction on how the build-out of greenfield residentially zoned areas is to occur.</li> <li>Amend the objective as follows:   14.2.8 Objective – <u>Development of greenfield areas</u> <del>Future Urban Zone</del>   Co-ordinated, sustainable and efficient use and development is enabled in <del>the Future Urban Zone</del> <u>greenfield growth areas</u>. </li> </ol>



ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>The FUZ zone provisions are focussed on preventing rural activities from occurring that could prejudice future urbanisation e.g. quarries or intensive farming or lifestyle block subdivision. Invariably the plan frameworks require a further plan change process to be undertaken to activate or 'live zone' a residential zone that can then be developed.</p> <p>The associated policies that guide the build-out of greenfield areas remain appropriate.</p>	
73.	Residential	Policy 14.2.9.4 – Existing non-residential activities	Support in Part	<p>This existing Operative Plan policy has in practice created ambiguity when non-residential sites are proposed to be redeveloped for a different non-residential activity i.e. the reference to 'redevelopment' can be interpreted as only applying to the existing activity having new facilities, rather than enabling the site to be efficiently repurposed for a</p>	<p>Amend the policy as follows:</p> <p>Enable existing non-residential <u>sites activities</u> to continue to be used <u>for a range of non-residential activities</u> and support their redevelopment and expansion provided they do not:</p> <ul style="list-style-type: none"> <li>i. have a significant adverse effect on the <u>anticipated</u> character and amenity of residential zones; or</li> <li>ii. <u>are of a scale or activity that would undermine the role or</u></li> </ul>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>different type of non-residential activity.</p> <p>With neighbourhoods transitioning to medium density outcomes, it is important that residents have easy access to convenience retail and a range of community facilities. The adaption and repurposing of existing non-residential sites is a useful tool for enabling such provision as part of delivering good quality neighbourhoods.</p> <p>It is accepted that such changes need to be assessed on a case-by-case basis to ensure compatibility with a residential context, with the MRZ and HRZ description both anticipating that such zones will include compatible non-residential activities.</p>	<p><u>function of any nearby commercial centres. undermine the potential for residential development consistent with the zone descriptions in Table 14.2.1.1a.</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
74.	Residential	Objective 14.2.12 and Policy 14.2.12.1 – compatibility with industrial activities	Oppose	<p>Kāinga Ora considers that at the interface of industrial and residential zones the onus for managing effects rest primarily with the industrial activity. The interfaces are already existing, with the Operative Plan having long zoned industrial areas adjacent to residential zones for light industrial activities. Invariably industry is required to meet residential zone standards relating to matters such as noise or glare at the zone boundary.</p> <p>Given the existing requirements to comply with residential standards at the zone interface, combined with the General Industrial zone standards that limit heavy industry in these buffer locations, the QM setback is not considered to be appropriate with the benefits of the QM not outweighing the costs.</p>	Delete Objective 14.2.12 and Policy 14.2.12.1 and the Industrial Interface Qualifying Matter and all associated provisions.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
75.	Residential	14.3 – how to apply the rules		Kāinga Ora notes that the relevant objectives and policies are still provided for within the Plan and therefore questions the relevance of these if the Community Housing redevelopment mechanism has been deleted.	<p>Consistent with this submission, Kāinga Ora supports the deletion of the Community Housing Redevelopment Mechanism, provided Plan Change 14 is amended consistent with the relief sought in this submission.</p> <p>Kāinga Ora notes that the relevant objectives and policies are still provided for within the Plan and therefore questions the relevance of these if the Community Housing redevelopment mechanism has been deleted.</p>
<b>14.3 How to interpret and apply the rules</b>					
76.	Residential	14.3 How to interpret and apply the rules – Clause f. xvi.	Oppose	The proposed deletion is consequential to the deletion of the Airport Noise Influence Area qualifying matter, amongst others deleted here and throughout the body of this submission.	<p>f. There are parts of residential zones where the permitted development, height and/or density directed by the MDRS or Policy 3 of the NPS-UD may be modified by qualifying matters. These are identified in detail in Chapter 6.1A and the Planning Maps, and include the following:</p> <p>i. Historic Heritage including heritage items, heritage settings, <b>Residential</b></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p><del>Heritage Area, Residential Heritage Area Interface</del></p> <p><del>ii. Riccarton Bush Interface Area</del></p> <p>iii. Heritage, Significant and other Trees</p> <p>iv. Sites of Ecological Significance</p> <p>v. Outstanding Natural Features and Landscapes</p> <p>vi. Sites of Cultural Significance</p> <p>vii. Residential Character Areas</p> <p>viii. High Flood Hazard Management Area</p> <p>ix. Flood Ponding Management Area</p> <p>x. Coastal Hazard High Risk Management Area and Coastal Hazard Medium Risk Management Area</p> <p>xi. Tsunami Management Area</p>



ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					xii. Slope Hazard xiii. Waterbody Setback <del>xiv. Railway Building Setback</del> xv. Electricity Transmission Corridor and Infrastructure <del>xvi. Airport Noise Influence Area</del> xvii. Waste Water Constraint Area xviii. Lyttelton Port Influence Area <del>xix. Low Public Transport Accessibility Area</del> <del>xx. City Spine Transport Corridor</del> <del>xxi. Industrial Interface</del>
<b>14.4 Residential Suburban and RSDT Zone rules</b>					
77.	Residential	14.4.2.2 – Tree and garden planting	Oppose	The proposed amendments to this rule duplicate and confuse the regulatory framework with	Delete the proposed amendments and retain the Operative Plan rule.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>the tree FC rule – essentially it introduces two rules to control the same matter.</p> <p>Kāinga Ora oppose the tree FC rule and this rule amendment for the reasons given in the submission on the tree FC rule.</p> <p>In the event that the tree FC rule is retained, this rule is sought to simply have an advice note directing Plan users to the FC rule and the additional tree canopy outcomes sought in that separate rule.</p>	
78.	Residential	14.4.2.3 - height	Oppose	<p>This rule introduces an 8m height limit if you're in the Riccarton Bush QM and under the Airport Noise Influence Area (which is why it has a RS zoning rather than MRZ).</p> <p>Kāinga Ora have opposed before the extent of the Airport Noise Influence Area and the Riccarton Bush QM and have sought the area around</p>	<ol style="list-style-type: none"> <li>1. Delete 8m Riccarton Bush height limit.</li> <li>2. Delete 7m height rule in the Industrial Interface Qualifying matter area and apply relevant MRZ or HRZ heights.</li> </ol>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>Riccarton Bush is MRZ to the north and HRZ to the south, as such there is no need for an 8m height limit in the RS zone.</p> <p>Separately the height rule also introduces a 7m height limit in the industrial interface QM – which given that this is a rule being applied to the RS and RSDT zones this duplicates an existing situation. Kāinga Ora supports the deletion of this rule and application of relevant MRZ or HRZ zones and heights.</p>	
<b>14.5 Medium Density Zone Rules</b>					
79.	Residential	All controlled and RD rules re notification statements		<p>Consistent logic needs to be applied to the notification statements as follows:</p> <p>If the rule controls an internal occupant amenity matter or general street-scape outcomes then rule breaches should be non-notified as it is only the</p>	<p>1. Amend notification statements in both activity and built form rules to align with this logic.</p> <p><b>Non-notified:</b></p> <p>14.5.1.3 (RD1) – four or more units</p> <p>14.5.2.2 – landscaping</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>occupant who is affected or passers-by;</p> <p>If the rule it controls a neighbouring site interface matter then it should be open to an assessment re limited notification but should not be publicly notified. Ltd but not full;</p> <p>If it rule controls a matter that could impact on urban form at a neighbourhood scale e.g. height, then it should be open to a full s95 assessment.</p>	<p>14.5.2.5 – Outdoor Living Space</p> <p>14.5.2.8 – Outlook space</p> <p>14.5.2.9 – Fencing</p> <p>14.5.2.10 – Windows to street</p> <p>14.5.2.11 – Minimum unit size</p> <p>14.5.2.12 – Ground floor habitable space</p> <p>14.5.2.13 – Service and storage space</p> <p>14.5.2.15 – Garage and carports</p> <p>14.5.2.16 – Building reflectivity</p> <p>14.5.2.16 – mechanical ventilation</p> <p>14.5.2.18 – Spine road setbacks</p> <p><b>Open to limited but not public notification:</b></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
80.	Residential	Assessment matters	Oppose	The proposed assessment matters for both the '4 or more units' urban design rule and the built form rules are excessive and overlapping. Kāinga Ora seek that they are simplified and consolidated.	<ol style="list-style-type: none"> <li>1. For the 'non-notified' rules set out above, the matters for assessment are to be limited to the adequate provision of amenity for occupants and the delivery of a functional and attractive streetscape.</li> <li>2. For the rules that potentially affect neighbouring sites set out above, additional matters relating to consideration of the amenity of neighbouring sites are appropriate.</li> <li>3. For height, additional matters relating to urban form and proximity to services and public and active transport modes are appropriate, along with consideration of wind effects for buildings over 22m in height.</li> <li>4. For the 4+ unit urban design rule, matters of discretion are sought to be as follows: <ol style="list-style-type: none"> <li>a) <u>Whether the design of the development is in keeping with, or complements, the scale and character of development anticipated for the surrounding area and relevant significant natural, heritage and cultural features.</u></li> </ol> </li> </ol>



ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p>b) <u>The relationship of the development with adjoining streets or public open spaces including the provision of landscaping, and the orientation of glazing and pedestrian entrances;</u></p> <p>c) <u>Privacy and overlooking within the development and on adjoining sites, including the orientation of habitable room windows and balconies;</u></p> <p>d) <u>The provision of adequate outdoor living spaces, outdoor service spaces, waste and recycling bin storage including the management of amenity effects of these on occupants and adjacent streets or public open spaces;</u></p> <p><u>Where on-site car parking is provided, the design and location of car parking (including garaging) as viewed from streets or public open spaces</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
81.	Residential	14.5.1(P1) – Residential activity	support	<p>The proposed amendment to P1 to delete the limit on units with more than 6 bedrooms is supported. The definition of 'residential activity' includes emergency and refuge housing, and sheltered housing and so the amendment better enables such facilities to be established in the MRZ as a permitted activity where they provide accommodation for more than 6 residents.</p> <p>It is noted that boarding houses, student hostels, and retirement villages are separately defined and managed through separate rules.</p>	Retain rule as proposed.
82.	Residential	14.5.1(P3) – Elderly Persons Housing	Support in Part	Need to clarify – the Operative Plan P3 provides a permitted pathway for the conversion of Elderly Persons Housing to general tenure as a permitted activity. The provision of such a pathway is supported. PC14	<p>Either:</p> <ol style="list-style-type: none"> <li>1. Reinstate P3 so there is a clear permitted pathway; or</li> <li>2. Include an advice note under P1 as follows:</li> </ol>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>proposes to delete this pathway.</p> <p>The PC14 amendment is ambiguous as to whether the deletion of P3 means that conversion of EPH is no longer permitted, OR is it proposed to be deleted because there is now no such thing as an EPH because MDRS now enables multi-units so it is now implicit that you can convert existing EPH as such conversion would simply fall within the ambit of P1?</p> <p>Given the number of EPH in the City it is important that there is an unambiguous position on how their conversion is to be treated.</p>	<p><u>Conversion of existing Elderly Persons Housing is permitted under P1.</u></p>
83.	Residential	Controlled		<p>PC14 deletes existing rules controlling non-compliance with tree and garden planting, ground floor habitable space, and service spaces. These are all existing Operative Plan rules rather than MDRS rules. Given</p>	<p>Retain controlled activity status Rule 14.5.1.2.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				that they are being retained as built form standards (apart from the overhang rule), the existing controlled activity status are sought to also be retained.	
84.		RD1 – urban design assessment	Support	Support retention of non-notified clause	Retain as notified
85.		RD27 – wind assessment	Oppose	<p>While Kāinga Ora does not oppose the potential need for wind assessments on tall buildings (above 6 storey), the concern lays around appropriateness of Matters of Discretion, the proposed height limits triggering an assessment and technical expertise available to carry out these assessments or determine if assessments (or anticipated effects) are appropriate.</p> <p>Kāinga Ora seeks that the rule provide a permitted pathway. Buildings may separately breach height rules but that is a separate matter (just as they will also invariably require</p>	<ol style="list-style-type: none"> <li>1. Delete the rule.</li> <li>2. As an alternative relief in the event that a regulatory approach to wind modelling is retained, redraft the rule to provide for a permitted pathway (for wind effects) where compliance with the specified performance standards is met.</li> <li>3. Kāinga Ora seeks that the provisions relating to wind effects are moved to sit under the General Rules.</li> </ol>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				consent under RD2 for more than 3 units).	
86.		D11 – industrial interface QM	Oppose	<p>Kāinga Ora considers that at the interface of industrial and residential zones the onus for managing effects rest primarily with the industrial activity. The interfaces are already existing, with the Operative Plan having long zoned industrial areas adjacent to residential zones for light industrial activities. Invariably industry is required to meet residential zone standards relating to matters such as noise or glare at the zone boundary.</p> <p>Given the existing requirements to comply with residential standards at the zone interface, combined with the General Industrial zone standards that limit heavy industry in these buffer locations, the QM setback is not considered to be appropriate with the benefits of</p>	Delete the Industrial Interface Qualifying Matter and all associated provisions.



ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				the QM not outweighing the costs.	
87.		14.5.2.1 – servicing advice note	Support in Part	<p>Servicing constraints mean that whilst resource consent could be granted, Building Consent could be declined if services are not available. Infrastructure constraints need to be readily searchable via on-line tool that can be readily updated, given that CCC presumably know where capacity limits are.</p> <p>The general onus is on Council to address constraints within Council-controlled networks via LTP and DC processes to enable MDRS.</p>	<ol style="list-style-type: none"> <li>1. Retain the advice note.</li> <li>2. Kāinga Ora seek that Council investigate the provision of an on-line publicly searchable tool to enable timely identification of site constraints.</li> </ol>
88.		14.5.2.2 – Landscaping and tree canopy	Oppose	In accordance with our submission seeking deletion of the tree canopy financial contribution rule, the landscaping and tree canopy rule is sought to be deleted and	<p>Delete rule and replace with the following:</p> <p><b><u>14.5.2.2 landscaped area.</u></b></p> <p><b><u>(1) A residential unit at ground floor level must have a landscaped area of a minimum of 20% of a developed site</u></b></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>replaced with the MDRS standard.</p> <p>An additional clause is proposed for non-residential activities that aligns with the MDRS outcomes.</p>	<p><u>with grass or plants, and can include the canopy of trees regardless of the ground treatment below them.</u></p> <p><u>2. The landscaped area may be located on any part of the development site, and does not need to be associated with each residential unit.</u></p> <p><u>3. Non-residential activities must have a landscaped area of a minimum of 20% of a developed site with grass or plants, and can include the canopy of trees regardless of the ground treatment below them.</u></p>
89.		14.5.2.3(i)a - Height	Support	Rule implements MDRS as per Schedule 3A	Retain rule as notified
90.		14.5.2.3(i)b – Height in local centre intensification precincts	Oppose	<p>The Local Centre Intensification Precincts are all located in close proximity to large suburban commercial centres such as Barrington and Bishopdale Malls. These areas are well placed to be HRZ.</p> <p>The areas within this precinct are sought to be rezoned to</p>	Delete clause.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				HRZ and therefore this clause can be deleted.	
91.		14.5.2.3(iv) Industrial interface and (v) Riccarton Bush	Oppose	<p>Kāinga Ora considers that at the interface of industrial and residential zones the onus for managing effects rest primarily with the industrial activity. The interfaces are already existing, with the Operative Plan having long zoned industrial areas adjacent to residential zones for light industrial activities. Invariably industry is required to meet residential zone standards relating to matters such as noise or glare at the zone boundary.</p> <p>Given the existing requirements to comply with residential standards at the zone interface, combined with the General Industrial zone standards that limit heavy industry in these buffer locations, the QM setback is not considered to be</p>	Delete 14.5.2.3(iv) and 14.5.2.3(v).

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>appropriate with the benefits of the QM not outweighing the costs.</p> <p>The area around Riccarton Bush is ideally located for supporting a High Density Residential Zone given its close proximity to a large town centre, cycleways, high frequency bus routes, and the large university activity hub</p>	
92.		14.5.2.4 – Building Coverage	Support in Part	<p>The rule implements MDRS as per Schedule 3A.</p> <p>Kāinga Ora support additional exemptions for eaves and guttering, although it is sought that this be extended to 600mm which is a standard eave depth and better provides for weather tightness design solutions. Eaves do not have a significant impact on visual dominance, and setbacks from neighbours are controlled through separate</p>	<p>Amend rule as follows:</p> <ul style="list-style-type: none"> <li>a. The maximum building coverage must not exceed 50% of the net site area.</li> <li>b. ...</li> <li>c. <b><u>Eaves and roof overhangs up to <del>300mm</del> 600mm in width and guttering up to 200mm in width form the wall of a building shall not be included in the building coverage calculation.</u></b></li> </ul>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				rules on internal setbacks and height-to-boundary.	
93.		14.5.2.5 – Outdoor living space	Support	The rule implements MDRS as per Schedule 3A	Retain rule as notified.
94.		14.5.2.6 – Height to boundary	Oppose	The provision as proposed is inconsistent with the MDRS.	Delete and replace with MDRS provision.
95.		14.5.2.7 – Building setbacks	Support in Part	<p>Support clauses (a)(i) and (ii) as implements MDRS as per Schedule 3A.</p> <p>Support clause (iii) enabling eaves and gutters to project into the road boundary setback. Extend the eave exemption to 600mm to align with standard building practice, along with enabling deeper porches which have a strong functional benefit. Such projections have a minimal impact on streetscape amenity and can have benefits through providing greater</p>	<p>1. Retain clause (a)(i) and (ii) as notified.</p> <p>2. Amend clause(a)(iii) as follows:</p> <p>Only road boundary: Eaves, <del>and</del> roof overhangs, <del>and porches</del> to a maximum of <del>300mm</del> <u>600mm</u> in width measured from the wall of a building and guttering up to 200mm in width.</p> <p>3. Amend clause (a)(iv) as follows:</p> <p>All other accessory buildings or garages, <u>including garages</u> that internally access a residential unit.</p>



ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought						
				<p>articulation in the street-facing facade.</p> <p>Clause (iv) – support reduction in setbacks for accessory buildings, subject to the limitations to height and length in the rule. A grammatical amendment would be helpful to clarify that accessory buildings do not need to have internal access to the dwelling</p>							
96.		14.5.2.8 – Outlook space	Support	The rule implements MDRS as per Schedule 3A. The minor amendment to clause (i)(i) is supported.	Retain the rule as notified.						
97.		14.5.2.9 - Fencing	Support in Part	<p>Support 2m height limit on internal boundary fencing.</p> <p>The proposed rules will result in a significant loss of occupant amenity where outdoor living is located between the unit and the street. Whilst such a layout is not generally preferred, for east-west streets, the units on the southern side of the street</p>	<p>Retain clause (iii) as notified.</p> <p>Delete clauses (i) and (ii) and replace with the following (Operative Plan rule and associated diagrams reinstated):</p> <table><tr><td></td><td><b><u>Fence type</u></b></td><td><b><u>standard</u></b></td></tr><tr><td><b><u>i</u></b></td><td><b><u>Where at least 50% of the fence structure is</u></b></td><td><b><u>1.8m</u></b></td></tr></table>		<b><u>Fence type</u></b>	<b><u>standard</u></b>	<b><u>i</u></b>	<b><u>Where at least 50% of the fence structure is</u></b>	<b><u>1.8m</u></b>
	<b><u>Fence type</u></b>	<b><u>standard</u></b>									
<b><u>i</u></b>	<b><u>Where at least 50% of the fence structure is</u></b>	<b><u>1.8m</u></b>									

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought						
				<p>will face north where it can often result in good design outcomes for the outdoor living to be located between the unit and the street to take advantage of the northern orientation.</p> <p>Retain the Operative Plan rules on road frontage fencing which are well understood by the design community and achieve an appropriate balance in occupant amenity and streetscape outcomes.</p>	<table><tr><td></td><td><u>visually transparent</u></td><td></td></tr><tr><td><u>ii</u></td><td><u>Where less than 50% of the fence structure is visually transparent</u></td><td><u>1.2m</u></td></tr></table>		<u>visually transparent</u>		<u>ii</u>	<u>Where less than 50% of the fence structure is visually transparent</u>	<u>1.2m</u>
	<u>visually transparent</u>										
<u>ii</u>	<u>Where less than 50% of the fence structure is visually transparent</u>	<u>1.2m</u>									
98.		14.5.2.10 – Windows to the street	Support in Part	<p>Clause (a) of the rule implements MDRS as per Schedule 3A.</p> <p>Clause (b) re excluding gables is supported.</p> <p>Clause (c) relating to units with large streetscene setbacks is also supported as the large setbacks mean that the streetscene outcomes sought by the rule are less relevant.</p>	<p>1. Retain clauses (a)-(d) as notified.</p> <p>2. Delete clause (e).</p>						

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>Clause (d) to incentivise front doors and their contribution towards an attractive street façade is supported.</p> <p>Clause (e), whilst trying to be enabling, adds considerable (and unnecessary) complexity to the rule for little gain.</p>	
99.		14.5.2.11 – Minimum unit size	Support	No amendments are proposed to the Operative Plan rule on minimum unit sizes. This rule is well-established and appears to be working well.	Retain rule as notified.
100.		14.5.2.12 – Ground floor habitable room	Support in Part	<p>The Operative Plan includes a rule controlling ground floor habitable rooms which is well-established and appears to be working well.</p> <p>There are two key design outcomes sought, namely 1) the ground floor on the road frontage is habitable space rather than garaging in order to deliver positive streetscape outcomes; and 2) that at least 50% of the ground floor across</p>	<p>Amend the rule as follows:</p> <p><del>a. Any building that includes a residential unit shall:</del></p> <p><del>i. Where the residential unit fronts a road or public open space, unless built over a separate ground floor residential unit, have a habitable room located at ground floor level with a minimum internal dimension of 3 metres; and</del></p> <p><del>ii. Any residential unit shall have at least 50% of any ground floor area as habitable rooms.</del></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>the site is habitable space, to avoid the ground floor of complexes being overly dominated by garaging and undercroft parking areas.</p> <p>The proposed rule is sought to be amended to better articulate these two outcomes and to avoid developments arranged as horizontally stacked low-rise apartments being unnecessarily penalised through a requirement for every unit to individually have ground floor space.</p> <p>As all MRZ now has a height limit of 11m or more, clause (b) requires amendment, noting that the outcomes of 50% habitable remains as a valid outcome for the small areas of MRZ that have a height of less than 11m through QMs.</p>	<p>a. <u>Where a residential unit fronts a road or public open space, it shall have a habitable room with a minimum internal dimension of 3 metres located at the ground floor level facing the frontage. This rule does not apply to upper-level units that are built over a separate ground floor residential unit; and</u></p> <p>b. <u>Where the permitted height limit is over 11m (refer to Rule 14.5.2.3),</u> a minimum of 50% of the ground floor area <u>across the site</u> shall be occupied by habitable spaces and/or indoor communal living space. This area may include pedestrian access to lifts, stairs, and foyers.</p> <p>c. This rule does not apply to residential units in a retirement village.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
101.		14.5.2.13 - storage	Support in Part	<p>The requirement for outdoor storage for bins and washing lines is an Operative Plan rule that appears to be working well.</p> <p>Clause (a) relating to outdoor storage is supported, although may be an unnecessary level of regulation if this matter is adequately covered by urban design assessment matters.</p> <p>Clause (b) is a new rule in PC14. It requires a minimum amount of internal storage to be provided. Whilst internal storage spaces are useful, this rule is considered to be an unnecessary level of regulation.</p> <p>It is noted that clause (a) only applies to 4 or more units, while clause (b) applies to all units i.e. it is unclear what the rationale is behind the different number of units that trigger the clauses.</p>	<ol style="list-style-type: none"> <li>1. Retain clause (a).</li> <li>2. Delete clause (b).</li> <li>3. Alternatively storage could be addressed as an assessment matter for developments of 4 or more units.</li> </ol>
102.		14.5.2.14 – Water supply for fire fighting	Neutral		



ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
103.		14.5.2.15 – Garage location	Support in Part	<p>The location of car parking can have a significant impact on streetscape quality. A requirement to recess garaging or carports behind the front building line is supported.</p> <p>It is noted that this rule is only triggered where there are 4 or more units. It also does not apply to surface car parking areas which can also have a significant adverse effect on streetscape. Recessing is only required along the street frontage i.e. the rule must not apply to the front face of units located internally within a site.</p>	<p>Amend the rule as follows:</p> <p>14.5.2.15 garaging and carport building <b>and parking area</b> location</p> <p><u>When developing four or more residential units on a single site, <b>where a residential unit fronts towards a road</b>, any garage, or carport shall be located at least 1.2 metres behind the front façade of a residential unit.</u></p>
104.		14.5.2.16 – Building reflectivity; and RD29	Oppose	<p>New rule that applies to the Residential Hills Precinct – Christchurch as had residential hill suburbs for over 100 years and these areas have not given rise to excessive glare issues from dwellings. Whilst rules controlling reflectivity can be appropriate in rural ONLs where the key outcome is to minimise the visibility of</p>	Delete rule.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>structures, such an outcome is not appropriate in residential suburbs where housing is an inherent part of the landscape.</p> <p>Requiring low light reflectance values means that buildings have to be finished in dark colours which can exacerbate urban heat island effects and require increased use of air conditioning to reduce unit heating in summer.</p>	
105.		<p>14.5.2.17 – Location of outdoor mechanical ventilation;</p> <p>And RD30</p>	Oppose	<p>New rule that requires a 3m setback if at ground level between a residential unit and the road or a shared accessway. Presumably it is visual effects that are the concern.</p> <p>The rule constitutes a level of design detail that is unnecessary to regulate. If mounted at ground level then even a short 1.2m high fence is sufficient to visually screen in a</p>	Delete the rule.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>similar manner to the proposed rule on bin storage.</p> <p>As drafted the rule applies to mechanical units on the ground, whereas they would be permitted if wall-mounted despite having a worse visual outcome. It also applies to mechanical units located adjacent to internal boundaries where the property next door (over the fence) has an accessway.</p>	
106.		14.5.2.18 – Spine Road setbacks	Oppose	<p>The new rule requires buildings and outdoor living spaces to be set back 4m from spine road corridors (where the corridor is less than 24m in width, which is the majority of the corridor given 20m road reserves are typical).</p> <p>It is understood that the intention of the rule is to enable road widening in the future to accommodate public rapid transit. If Council's intention is to acquire land in the future to</p>	<ol style="list-style-type: none"> <li>1. Delete the rule.</li> <li>2. If land acquisition for public works is the intent, then Council should initiate a Notice of Requirement to designate the corridor.</li> </ol>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>facilitate public works then it should use the designation powers available to it.</p> <p>Given the highly developed nature of these existing corridors with lengthy sections of commercial property built to the road boundary, it is unclear how any corridor-long road widening will occur without major land acquisition and demolition.</p>	
<b>High Density Residential Zone</b>					
107.		Controlled and Restricted Discretionary notification statements	Support in Part	<p>Consistent logic needs to be applied to the notification statements as follows:</p> <p>If the rule controls an internal occupant amenity matter or general street-scape outcomes then rule breaches are sought to be non-notified as it is only the occupant who is affected or passers-by;</p>	<p>Amend notification statements in both activity and built form rules to align with this logic.</p> <p>Non-notified:</p> <p>14.6.1.3 (RD2) – four or more units</p> <p>14.6.2.7 – landscaping</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>If the rule it controls a neighbouring site interface matter then it should be open to an assessment re limited notification but should not be publicly notified. Ltd but not full;</p> <p>If it rule controls a matter that could impact on urban form at a neighbourhood scale e.g. height, then it should be open to a full s95 assessment.</p>	<p>14.6.2.10 – Outdoor Living Space</p> <p>14.6.2.4 – Outlook space</p> <p>14.6.2.5 – Building separation</p> <p>14.6.2.6 – Fencing</p> <p>14.6.2.8 – Windows to street</p> <p>14.6.2.16 – Minimum unit size</p> <p>14.6.2.9 – Ground floor habitable space</p> <p>14.6.2.11 – Service and storage space</p> <p>14.6.2.14 – Garage and carports</p> <p>14.6.2.15 – mechanical ventilation</p> <p>14.6.2.17 – Spine road setbacks</p> <p>Open to limited but not public notification:</p> <p>14.6.2.12 – Building coverage</p> <p>14.6.2.2 – height to boundary</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					14.6.2.3 – internal boundary setbacks  14.6.2.13 – Water for Firefighting (FENZ only)  Open to full s95 assessment:  14.6.2.1 – height
108.		Assessment matters	Oppose	The proposed assessment matters for both the '4 or more units' urban design rule and the built form rules are excessive and overlapping. Kāinga Ora seeks that they be simplified and consolidated.	<ol style="list-style-type: none"> <li>1. For the 'non-notified' rules set out above, the matters for assessment are sought to be limited to the adequate provision of amenity for occupants and the delivery of a functional and attractive streetscape.</li> <li>2. For the rules that potentially affect neighbouring sites set out above, additional matters relating to consideration of the amenity of neighbouring sites are appropriate.</li> <li>3. For height, additional matters relating to urban form and proximity to services and public and active transport modes are appropriate, along with consideration of wind effects for buildings over 22m in height.</li> </ol>



ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p>4. For the 4+ unit urban design rule, matters of discretion are sought to be as follows:</p> <p>e) <u>Whether the design of the development is in keeping with, or complements, the scale and character of development anticipated for the surrounding area and relevant significant natural, heritage and cultural features.</u></p> <p>f) <u>The relationship of the development with adjoining streets or public open spaces including the provision of landscaping, and the orientation of glazing and pedestrian entrances;</u></p> <p>g) <u>Privacy and overlooking within the development and on adjoining sites, including the orientation of habitable room windows and balconies;</u></p> <p>h) <u>The provision of adequate outdoor living spaces, outdoor</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p><u>service spaces, waste and recycling bin storage including the management of amenity effects of these on occupants and adjacent streets or public open spaces;</u></p> <p>i) <u>Where on-site car parking is provided, the design and location of car parking (including garaging) as viewed from streets or public open spaces.</u></p>
109.		RD2 and RD6 – urban design	Support in Part	<p>RD2 is the Operative Plan rule that requires an urban design assessment for more than 3 units. Clause (a)(i) of the rule implements MDRS as per Schedule 3A.</p> <p>Clause (a)(ii) and (iii) are unnecessary as the assessment of projects that do not comply with garage location and ground floor habitable space are addressed through proposed rule RD20.</p>	<p>Retain clauses (a)(i) and (b)</p> <p>Delete clauses (a)(ii) and (iii).</p> <p>Delete rule RD6</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>Given that the purpose of this rule is to enable an urban design assessment, rather than consideration of any built form rule breaches, the retention of the clause (b) 'not limited or publicly notified' clause is supported.</p> <p>Proposed RD6 simply duplicates the assessment required under RD2(a)(i) and therefore is unnecessary and is sought to be deleted.</p>	
110.		RD7 and RD 8 – building heights  14.6.2.1 - Height	Oppose	<p>The approach to managing height is unnecessarily over-complicated and seeks to introduce additional built form rules relating to outdoor living space and internal boundary setbacks as an activity standard.</p> <p>Kāinga Ora seek that the Plan be simplified so that the MRZ has a single height limit rule as per the MDRS (subject to QMs). What is currently the MDRS Local Centre</p>	<ol style="list-style-type: none"> <li>1. Delete these two activity rules.  Replace with:  <b><u>Buildings that do not meet Rule 14.6.2.1 Building Height.</u></b></li> <li>2. Retain matter of discretion reference to 'Impacts on neighbouring property – Rule 14.15.3a'.</li> <li>3. Delete references to: Town Centre Intensification Precinct; and replace with 'Height Variation Overlay'.</li> </ol>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>Intensification Precinct is sought to be rezoned to HRZ.</p> <p>The HRZ is sought to have two height limit areas – a 22m limit for the majority of the area taking in what are currently the MRZ Local intensification precinct, and the Large Local Centre Intensification Precinct. The extent of the HRZ is proportionate to the size of the centre so large centres support a greater walkable catchment. But the height enabled in the HRZ remains the same at 22m.</p> <p>HRZ is sought 0-1.20km from the edge of the MCZ and the CCZ.</p> <p>A 36m 'Height Variation Control' is sought to apply 0-400m from the edge of the Metropolitan Centre Zone (as sought within this submission) (Riccarton, Hornby and Papanui centres).</p>	<p>4. Subject to the relief sought above, further consequential changes may be necessary to fully incorporate the effects of the zone changes discussed in the reason related to Metropolitan Centres.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>A 36m 'Height Variation Control' is sought to replace the High Density Residential Precinct and 0-400m from the edge of the CCZ.</p> <p>Rules controlling boundary setback, height to boundary, outdoor living space, and landscaping are all covered by other built form rules. The PC14 height to boundary rule requires at least a 6m setback from boundaries for buildings over 12m.</p> <p>Tall buildings are anticipated in the HRZ and therefore are sought to be permitted up to the height limit. Such buildings will remain subject to an assessment of qualitative urban design outcomes as covered by the urban design assessment matters for 4+ units.</p> <p>Buildings that exceed the height limits are RD, and subject to additional assessment of the</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				built form matters of discretion for height breaches.	
111.	Residential	14.6.1.3 RD13	Oppose	In accordance with our submission seeking deletion of the tree canopy financial contribution rule, the landscaping and tree canopy rule is sought to be deleted and replaced with the MDRS standard.	Delete the rule.
112.		RD17	Support in Part	<p>While Kāinga Ora does not oppose the potential need for wind assessments on tall buildings (above 6 storey), the concern lays around appropriateness of Matters of Discretion, the proposed height limits triggering an assessment and technical expertise available to carry out these assessments or determine if assessments (or anticipated effects) are appropriate.</p> <p>The rule should provide a permitted pathway. Buildings may separately breach height</p>	<ol style="list-style-type: none"> <li>1. Delete the rule.</li> <li>2. As an alternative relief in the event that a regulatory approach to wind modelling is retained, redraft the rule to provide for a permitted pathway (for wind effects) where compliance with the specified performance standards is met.</li> <li>3. Kāinga Ora seek that the provisions relating to wind effects are relocated to within the General Rules.</li> </ol>



ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				rules but that is a separate matter (just as they will also invariably require consent under RD2 for more than 3 units).	
113.		D1 and NC1 –education, spiritual, heath, pre-school activities	Support in Part	<p>The Operative Plan has restrictive rules controlling non-residential activities within the City Centre (Four Avenues) due to historic pressure to develop such areas for non-residential use.</p> <p>The HRZ now extends much further than the City Centre, however the restrictive ‘4 Aves’ rules have been carried over so they now apply throughout the HRZ.</p> <p>The HRZ includes areas in close proximity to the larger commercial centres where the provision of a range of community facilities is very appropriate and has long been anticipated and provided for in the District Plan. Easy accessibility to such services</p>	<ol style="list-style-type: none"> <li>1. Retain Rule D1 for education, spiritual, heath, pre-school activities located inside the Four Avenues.</li> <li>2. Adopt the MRZ provisions/ activity status for such activities located in the HRZ outside the Four Avenues.</li> </ol>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>and facilities is likewise a key element in delivering well-functioning urban environments and good quality high density residential neighbourhoods.</p> <p>Whilst retention of the existing restrictive approach to such facilities inside the Four Avenues may be appropriate, the existing framework in the Residential Medium Density Zone is considered to be more appropriate for the HRZ areas outside of the Four Avenues.</p>	
114.		Add new provisions for retail, office, and commercial service activity on the ground floor of apartment buildings		<p>It is common for apartment buildings to contain a small-scale commercial activity on the ground floor, often adjacent to the entrance foyer and as a means of buffering residential activity from what can be busy frontage roads. The provision of such services can likewise have significant convenience benefits for residents and is consistent with a good quality, high density neighbourhood. The ability to provide shared workspaces in</p>	<p>Add a new restricted discretionary and fully discretionary rule as follows:</p> <p><b><u>Retail, office, and commercial service activity</u></b></p> <p><b><u>a. Activity status: Restricted Discretionary</u></b></p> <p><b><u>Where:</u></b></p> <p><b><u>i. The retail, office, or commercial service activity is limited to the</u></b></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				apartment buildings is consistent with emerging remote working trends where people still seek companionship during the day whilst working remotely from their employer. Provided the scale of non-residential facilities is limited there is minimal potential for such to undermine the role and function of nearby commercial centres which typically cover several hectares.	<p><u>ground floor tenancy of an apartment building;</u></p> <p><u>ii. The gross floor area of the activity/activities does not exceed 200m<sup>2</sup>; and</u></p> <p><u>iii. The hours of operation are between:</u></p> <p><u>i. 7.00am and 9.00pm Monday to Friday; and</u></p> <p><u>ii. 8.00am and 7.00pm Saturday, Sunday, and public holidays.</u></p> <p><u>The Council's discretion shall be limited to the following matters:</u></p> <p><u>a. The design, appearance and siting of the activity;</u></p> <p><u>b. Noise and illumination;</u></p> <p><u>c. Signage.</u></p> <p><u>2. Activity status: Discretionary</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<u>Where compliance is not achieved with the matters specified in HRZ-RX(a)(i), (ii) and/or (iii).</u>
115.		14.6.2 – Built form standards note	Oppose	<p>The built form rules start with a new note that the standards apply “to all permitted activities and restricted discretionary RD2” i.e. 3+ units.</p> <p>This note is ambiguous as it implies that the built form standards do not apply to any non-residential activities or activities that breach other RD, D or NC rules.</p> <p>It is questionable whether the note is necessary, but if it is to be retained it would be better placed in the ‘how to use the rules’ section. Kāinga Ora seek that it simply state that in addition to being subject to the activity standards, all buildings are also subject to the built form rules.</p>	<p>1. Delete the note.  2. As an alternative relief, if the note is to be retained, then relocate it to the ‘how to use the rules’ section 14.3 as follows:</p> <p><u>In addition to being subject to the activity standards, all buildings are also subject to the built form standards.</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
116.		14.6.2.1 - Height	Support in Part	See discussion under RD7 and RD8 above.	Amend clause (a) of the rule as follows:  a. Buildings must not exceed <b>14.22</b> metres in height above ground level;  <b>b. <u>Buildings located in the Height Variation Control overlay must not exceed 36 metres in height above ground level;</u></b>
117.		14.6.2.2 – Height to boundary	Support in Part	Kāinga Ora supports the encouragement of perimeter block development and building mass at front edge. However there is some concern over if the 20m, or 60% element of the provision is appropriate. For example, the 20m length should be increased to better align with standard block sizes in the High Density Zone. Kāinga Ora is also concerned, while the intent of the rule will achieve desired development outcomes, its drafting could be simplified.	Redraft provisions to improve clarity for plan users and ensure that dimensions referred to in the provision reflects block sizes within the High Density Zone.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
118.		14.6.2.3 - Setbacks	Support in Part	<p>Support clauses (a) and (b)(i) as implements MDRS as per Schedule 3A.</p> <p>Support clause (b)(ii) – support reduction in setbacks for accessory buildings, subject to the limitations to height and length in the rule. A grammatical amendment would be helpful to clarify that accessory buildings do not need to have internal access to the dwelling.</p> <p>Support clause (b)(iii) enabling eaves and gutters to project into the road boundary setback. Extend the eave exemption to 600mm to align with standard building practice, along with enabling deeper porches which have a strong functional benefit. Such projections have a minimal impact on streetscape amenity and can have benefits through providing greater articulation in the street-facing facade.</p>	<p>Retain clause (a) and (b)(i) as notified.</p> <p>Amend clause (b)(ii) and (iii) as follows:</p> <p>(b) This standard does not apply to site boundaries:</p> <p>(i)...</p> <p>(ii) side and rear setbacks: for accessory buildings or garages, <b>including garages</b> that internally access a residential unit, where the accessory building or garage is less than 3 metres in height and the total length of the building does not exceed 10.1m; and</p> <p>(iii) front boundary setbacks: where eaves, <b>and</b> roof overhangs, <b>and porches</b> up to <b>300mm 600mm</b> in width and guttering up to 200mm in width from the wall of a building intrude into the boundary setback.</p>



ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
119.		14.6.2.4 - Outlook Space	Support	Support as implements MDRS as per Schedule 3A. Minor amendment to clarify clause (i) is also supported.	Retain rule as notified
120.		14.6.2.5 – Building separation	Support in Part	<p>It is understood that the intent of the rule is to manage built form within the site i.e. the rule is to ensure separation between two towers on the same site, rather than provide separation with buildings on neighbouring sites (as separation to neighbours is managed through a combination of height to boundary, internal boundary setbacks and outlook space rules).</p> <p>The outcome of having reasonable space between taller built elements on the same site is supported, subject to the rule being amended to make its application clear.</p> <p>The other option is to delete the rule and rely on separation being addressed in part through the outlook space rule, plus</p>	<p>Delete the rule and replace as follows:</p> <p><u><b>Any parts of a building located more than 12m above ground level shall be separated by at least 10m from any other buildings on the same site that are also located more than 12m above ground level.</b></u></p> <p><u><b>Or alternatively, delete the rule entirely.</b></u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought									
				urban design assessment matters, and therefore this rule is unnecessary.										
121.		14.6.2.6 - Fencing	Support in Part	<p>Support 2m height limit on internal boundary fencing.</p> <p>The proposed rules will result in a significant loss of occupant amenity where outdoor living is located between the unit and the street. Whilst such a layout is not generally preferred, for east-west streets, the units on the southern side of the street will face north where it can often result in good design outcomes for the outdoor living to be located between the unit and the street to take advantage of the northern orientation.</p> <p>Retain the Operative Plan rules on road frontage fencing which are well understood by the design community and achieve an appropriate balance in occupant amenity and streetscape outcomes.</p>	<p>Retain clause (iii) relating to internal boundaries as notified.</p> <p>Delete clauses (i) and (ii) and replace with the following (Operative Plan rule and associated diagrams reinstated):</p> <table><tr><td></td><td><b><u>Fence type</u></b></td><td><b><u>standard</u></b></td></tr><tr><td><b><u>i</u></b></td><td><b><u>Where at least 50% of the fence structure is visually transparent</u></b></td><td><b><u>1.8m</u></b></td></tr><tr><td><b><u>ii</u></b></td><td><b><u>Where less than 50% of the fence structure is visually transparent</u></b></td><td><b><u>1.2m</u></b></td></tr></table>		<b><u>Fence type</u></b>	<b><u>standard</u></b>	<b><u>i</u></b>	<b><u>Where at least 50% of the fence structure is visually transparent</u></b>	<b><u>1.8m</u></b>	<b><u>ii</u></b>	<b><u>Where less than 50% of the fence structure is visually transparent</u></b>	<b><u>1.2m</u></b>
	<b><u>Fence type</u></b>	<b><u>standard</u></b>												
<b><u>i</u></b>	<b><u>Where at least 50% of the fence structure is visually transparent</u></b>	<b><u>1.8m</u></b>												
<b><u>ii</u></b>	<b><u>Where less than 50% of the fence structure is visually transparent</u></b>	<b><u>1.2m</u></b>												

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
122.		14.6.2.7 - Landscaping and tree cover	Oppose	<p>In accordance with our submission seeking deletion of the tree canopy financial contribution rule, the landscaping and tree canopy rule is also sought to be deleted and replaced with the MDRS standard.</p> <p>An additional clause is proposed for non-residential activities that aligns with the MDRS outcomes.</p>	<p>Delete rule and replace with the following:</p> <p><b><u>14.5.2.2 landscaped area</u></b></p> <p><b><u>(1) A residential unit at ground floor level must have a landscaped area of a minimum of 20% of a developed site with grass or plants, and can include the canopy of trees regardless of the ground treatment below them.</u></b></p> <p><b><u>2. The landscaped area may be located on any part of the development site, and does not need to be associated with each residential unit.</u></b></p> <p><b><u>3. Non-residential activities must have a landscaped area of a minimum of 20% of a developed site with grass or plants, and can include the canopy of trees regardless of the ground treatment below them.</u></b></p>
123.		14.6.2.8 - Windows to street	Support in Part	<p>Clause (a) of the rule implements MDRS as per Schedule 3A.</p>	<p>Retain clause (a)-(d) as notified.</p> <p>Delete clause (e).</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>Clause (b) re excluding gables is supported.</p> <p>Clause (c) relating to units with large streetscene setbacks is also supported as the large setbacks meant that the streetscene outcomes sought by the rule are less relevant.</p> <p>Clause (d) to incentivise front doors and their contribution towards an attractive street façade is supported.</p> <p>Clause (e), whilst trying to be enabling, adds considerable (and unnecessary) complexity to the rule for little gain.</p>	
124.		14.6.2.9 – Ground floor habitable rooms	Support in Part	<p>The Operative Plan includes a rule controlling ground floor habitable rooms which is well-established and appears to be working well.</p> <p>There are two key design outcomes sought, namely 1) the ground floor on the road</p>	<p>Amend the rule as follows:</p> <p><del>a. Any building that includes a residential unit shall:</del></p> <p><del>i. Where the residential unit fronts a road or public open space, unless built over a separate ground floor residential unit, have a habitable room located at ground floor level</del></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>frontage is habitable space rather than garaging in order to deliver positive streetscape outcomes; and 2) that at least 50% of the ground floor across the site is habitable space, to avoid the ground floor of complexes being overly dominated by garaging and undercroft parking areas.</p> <p>The proposed rule is sought to be amended to better articulate these two outcomes and to avoid developments arranged as horizontally stacked low-rise apartments being unnecessarily penalised through a requirement for every unit to individually have ground floor space.</p> <p>The outcome of 50% habitable at ground floor across a site is an appropriate outcome for HRZ.</p>	<p><del>with a minimum internal dimension of 3 metres; and</del>  <del>ii. Any residential unit shall have at least 50% of any ground floor area as habitable rooms.</del></p> <p>a. <u>Where a residential unit fronts a road or public open space, it shall have a habitable room with a minimum internal dimension of 3 metres located at the ground floor level facing the frontage. This rule does not apply to upper-level units that are built over a separate ground floor residential unit; and</u></p> <p>b. <del>have at least 50% of any ground floor area as habitable rooms, except on sites where at least 25% of the building footprint is more than 4 storeys, which shall have at least 30% of any ground floor area as habitable rooms.</del></p> <p><u>A minimum of 50% of the ground floor area across the site shall be occupied by habitable spaces and/or indoor communal living space. This area may include pedestrian access to lifts, stairs, and foyers.</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
125.		14.6.2.10 - Outdoor living space	support	<p>Clauses (a) and (b) implement MDRS as per Schedule 3A</p> <p>Clause (c) provides a useful reduction for studio/ 1 bed units to 15m<sup>2</sup> (ground floor) or 6m<sup>2</sup> balcony if located above ground floor.</p>	Retain rule as notified.
126.		14.6.2.11 – Storage space	Support in Part	<p>The requirement for outdoor storage for bins and washing lines is an Operative Plan rule that appears to be working well.</p> <p>Clause (a) relating to outdoor storage is supported, although may be an unnecessary level of regulation if this matter is covered by urban design assessment matters.</p> <p>Clause (b) is a new rule in PC14. It requires a minimum amount of internal storage to be provided. Whilst internal storage spaces are useful, this rule is considered to be an unnecessary level of regulation.</p>	<ol style="list-style-type: none"> <li>1. Retain clause (a), noting that if outdoor storage is addressed as an urban design assessment matter then a separate rule may be unnecessary.</li> <li>2. Delete clause (b).</li> </ol>



ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				It is noted that clause (a) only applies to 4 or more units, while clause (b) applies to all units i.e. it is unclear what the rationale is behind the different number of units that trigger the clauses.	
127.		14.6.2.12 - Building coverage	Support in Part	<p>The rule implements MDRS as per Schedule 3A.</p> <p>Support additional exemption for eaves and guttering, although this is sought to be extended to 600mm which is a standard eave depth and better provides for weather tightness design solutions. Eaves do not have a significant impact on visual dominance, and setbacks from neighbours are controlled through separate rules on internal setbacks and height-to-boundary.</p> <p>Clause (a)(ii) seeks to enable greater site coverage in the HRZ. An increase to 60% is supported and is a useful tool in differentiating between MRZ</p>	<p>1. Amend as follows:</p> <p>a. <u>The maximum building coverage must not exceed <del>50</del> 60% of the net site area;</u></p> <p>i. <u>Any eaves and roof overhangs up to <del>300mm</del> 600mm in width and guttering up to 200mm in width from the wall of a building shall not be included in the building coverage calculation.</u></p> <p>2. Delete Clause (a)(ii).</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				and HRZ. The proposed clause is however unnecessarily complex, with outdoor space and landscaping both subject to other rules and noting that the proposed ground floor habitable space rule will also necessitate the provision of ground floor outdoor living spaces.	
128.		14.6.2.13 – water supply for fire fighting	Neutral		
129.		14.6.2.14 - Garaging	Oppose	<p>Whilst the equivalent rule in the MRZ requires garaging to be recessed behind the front façade, this rule requires garaging to be located behind the rear façade of a residential unit.</p> <p>This rule is unworkable for carparking levels in apartment buildings where such parking is invariably located beneath (or above) a residential unit rather than behind the unit's rear façade.</p>	<p>Delete the rule and replace as follows:</p> <p><b><u>14.6.2.14 garaging and carports</u></b></p> <p><b><u>Where a residential unit fronts towards a road, any garage or carport shall be located at least 1.2 metres behind the front façade of a residential unit.</u></b></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>For smaller scale developments ie. 2-3 storey, having parking recessed behind the front façade provides an acceptable outcome, in combination with the urban design assessment matters for 4+ units.</p> <p>The rule wording sought in the equivalent rule in the MRZ is considered to be equally applicable.</p>	
130.		14.6.2.15 – Location of mechanical ventilation	Oppose	<p>New rule that requires a 3m setback if at ground level between a residential unit and the road or a shared accessway. Presumably it is visual effects that are the concern.</p> <p>Level of design detail that is unnecessary to regulate. If mounted at ground level then even a short 1.2m high fence is sufficient to visually screen in a similar manner to the proposed rule on bin storage.</p>	Delete the rule.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				As drafted the rule applies to mechanical units on the ground, whereas they would be permitted if wall-mounted despite having a worse visual outcome. It also applies to mechanical units located adjacent to internal boundaries where the property next door (over the fence) has an accessway.	
131.		14.6.2.16 - Minimum unit sizes	Support	No amendments are proposed to the Operative Plan rule on minimum unit sizes. This rule is well-established and appears to be working well.	Retain rule as notified.
132.		14.6.2.17 - Spine road setbacks	Oppose	<p>The new rule requires buildings and outdoor living spaces to be set back 4m from spine road corridors (where the corridor is less than 24m in width).</p> <p>It is understood that the intention of the rule is to enable road widening in the future to accommodate public rapid transit. If Council's intention is to acquire land in the future to</p>	<p>Delete the rule.</p> <p>If land acquisition for public works is the intent, then Council should initiate a Notice of Requirement to designate the corridor.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>facilitate public works then it should use the designation powers available to it.</p> <p>Given the highly developed nature of these existing corridors with lengthy sections of commercial property built to the road boundary, it is unclear how any corridor-long road widening will occur without major land acquisition and demolition.</p>	
<b>14.7 – Residential Hills Zone</b>					
133.				<p>The Residential Hills zone is an existing Operative Plan zone that covers the Port Hills Suburbs. PC14 as notified includes a QM on public transport accessibility. Areas that fall within this QM retain their existing low-density Operative Plan zoning.</p> <p>It would appear that the public transport QM is the only QM</p>	Delete zone and replace with MDZ.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				that is generating the need to retain the Residential Hills Zone. Given our submission that the public transport QM is not a valid QM and is sought to be deleted, a consequence is that the Residential Port Hills Zone is also sought to be deleted and replaced by MRZ	
<b>14.12 – Future Urban Zone</b>					
134.				See above discussion on Objective 14.2.8. The Future Urban Zone ('FUZ') is a relabelling of Residential New Neighbourhood Zone. This is the wrong label and not the intention of the National Planning Standards. FUZ are a mechanism for signalling rural areas that will be urbanised at some point in the future as a holding pattern, with the 'live' zone to be developed at a later date through a subsequent plan change process. RNN are existing well-established live	Delete the FUZ and replace with MDRZ.  The associated rules relating to build-out of these areas/ compliance with ODPs, or any area-specific rules can equally be located at the end of the MDRZ provisions.



ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				zones (albeit that some of them are still being built out). These areas are sought to simply be MDRZ unless there is a qualifying matter in play that would preclude MDRZ zoning.	
<b>14.14 – Community Housing Redevelopment Mechanism</b>					
136.	Chapter 14.14 – Community Housing Redevelopment Mechanism	Whole Chapter	Support	Kāinga Ora supports the deletion of the Community Housing Redevelopment Mechanism, provided Plan Change 14 is consistent with the MDRS and NPS-UD.	Kāinga Ora supports the deletion of the Community Housing Redevelopment Mechanism, provided Plan Change 14 is amended consistent with the relief sought in this submission.
<b>Chapter 15 - Commercial</b>					
137.		Related to the commercial chapter as a whole	Support in part	Kāinga Ora seeks that Metropolitan Centres are introduced within the centres hierarchy, as per the forward-looking aspects of the NPS-UD policies of 1, 3, and 6. These are sought to cover the existing key activity areas for Riccarton, Papanui, and Hornby. The size,	<ol style="list-style-type: none"> <li>1. Insert reference to Metropolitan Centres in all relevant provisions of the chapter.</li> <li>2. Insert rules for metropolitan centre zone as attached in <b>Appendix 2</b>.</li> </ol>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>scale, existing and future function of these centres are such that they merit the application of a Metropolitan Centre Zone classification, and thus an appropriate objective, policy and rules framework.</p> <p>Further, recent and proposed investment in public and active transport modes along the corridors in which these activity centres are located support the case for a zoning classification reflective of their relative position within the centres hierarchy.</p>	
<b>Chapter 15.2 – Commercial Policy framework</b>					
138.		Policy 15.2.2.1, Table 15.1 – Commercial zone titles	Support in part	<p>Support amendments to Table 15.1 of Policy 15.2.2.1 in so far as these reflect National Planning Standards nomenclature.</p> <p>Kāinga Ora</p>	<p>Realignment of Commercial Zone names with National Planning Standard (<b>NPS</b>) zone descriptions (Chapter 2 Interpretation). The allocation of centres to the NPS labelling appears generally appropriate if Metropolitan Centre is added.</p> <p>B. Town Centre: Key Activity Centre:</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p>Retain reference to '<i>High Density Housing is contemplated ... and around larger local centres</i>'.</p> <p>C. Local Centres: Retain reference to '<i>High Density Housing is contemplated ... and around larger local centres</i>'.</p>
138.		Table 15.1 - Centre hierarchy		<p>The role and function of centres has a direct bearing on the associated geographic extent and zoning of high density residential zoning around the centre. The hierarchy needs to reflect both current condition and potential future state in the event that enabled development occurs.</p> <p>The centre hierarchy for Local Centres in particular is considered to be unnecessarily complex and it is sought that these be simplified, along with a commensurate simplification in the heights and zoning of the surrounding residential area.</p>	<ol style="list-style-type: none"> <li>1. Amend role and function of Church Corner, Sydenham and Merivale from 'Local Centre (Large)' to 'Town Centre'.</li> <li>2. Consolidate all Local Centres into a simple category i.e. delete the distinction between 'small' and 'medium'.</li> <li>3. Incorporate Metropolitan centres and relabel Riccarton, Hornby, Papanui Northlands as such and as shown within <b>Appendix 3</b>.</li> </ol>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>Church Corner, Sydenham and Merivale are evolving and will be establishing a substantial residential catchment through development enabled by PC14. In addition, these 'centres' are positioned within corridors identified as Mass Transit Network and Growth Corridors within the Greater Christchurch 'Huihui Mai' Consultation Plan for accommodating Growth to 2050. The corresponding Council s32 Report 'Commercial Appendix 2' identifies such centres as performing a greater role in intensification enablement and diversity of function.</p> <p>The large local centres should be town centres, with small and medium local centres merged into a single 'local centre' category.</p>	
139.		Policy 15.2.2.7 – Residential activity in centres	Support in part	Amend so that the provision also provides for residential activity within Neighbourhood centres. Rule 15.5.1.1.1(P19)	Amend Policy 15.2.2.7 as follows: Residential activity in district Town, and

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				provides for such above ground floor, or to the rear of the premises fronting the street.	Local <u>and neighbourhood</u> centres  Residential activity in <del>district town</del> , <u>and</u> Local <u>and neighbourhood</u> <del>neighbourhood</del> centres ....
140.		Objective 15.2.3(b) – Mixed use areas	Support in part	<p>Kāinga Ora support the principle of providing for Mixed Use Zones proximate to the City Centre Zone to transition to higher density residential neighbourhoods.</p> <p>The application of the provision is unclear however. The ‘Objective Heading’ refers to mixed use <u>outside the central city</u>. <b>Central City</b> is defined (in the operative Plan) as that part of the City contained within the four avenues. Whereas the amendment to Chapter 2 Interpretation to introduce ‘<b>City Centre – means the City Centre Zone</b>’.</p> <p>This confusion is then reinforced in Policy 15.2.3.2 where the ‘heading’ references Mixed Use Zones outside the central city, then conflicts with</p>	<p>Amend the objective as follows:</p> <p><b>15.1.1 Objective - Office parks and mixed use areas <u>outside the central city (except the Central City Mixed Use and Central City Mixed Use (South) Zones)</u>.</b></p> <p><b>a.</b> Recognise the existing nature, scale and extent of commercial activity within the Commercial Office and <del>Commercial</del> Mixed Use Zones, but avoid the expansion of existing, or the development of new, office parks <del>and/or mixed use areas</del>.</p> <p><b>b.</b> <u>Mixed use zones located <b>within a 15min walking distance of close to the</b> City Centre Zone transition into high density residential neighbourhoods that contribute to an improved</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>(b) which references increased opportunities within a 15 minute walking distance of the <b>City Centre Zone</b> (which would therefore include the Commercial Central City Mixed Use and Central City Mixed Use (South Frame) zones). If the aim is to deliberately exclude the Central City Mixed Use and South Frame Zones, this should be made clear, and Policy 15.2.7.1 'Diversity of Activities' amended to encourage a transition into good quality residential neighbourhoods.</p> <p>'Close' should be replaced by explicit reference to the respective zones (presumed to be the 15-minute walking distance in Policy 15.2.3.2(b)).</p> <p>Referencing a reduction in greenhouse gas emissions is superfluous in this context, given proximity and modal choice.</p>	<p><u>diversity of housing type, tenure and affordability</u> <del>and support a reduction in greenhouse gas emissions.</del></p>



ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				The intent and objectives of these amendments to the plan change do not seem to be achievable through the rules proposed. Kāinga Ora submits that it may be more appropriate to consider these zone changes and rules through a subsequent schedule 1 process.	
141.		Policy 15.2.3.2 – Mixed use	Support in part	<p>Amend ‘outside the central city’ as above.</p> <p>A ‘high quality’ residential neighbourhood is subjective and is referenced in terms of residential zone outcomes (Objective 14.2.4). Such is an inappropriately high threshold for residential development in a transitioning and Mixed Use zone. Contributing positively to quality and design is sufficient.</p> <p>Delete reference to ‘reducing greenhouse gas emissions’ as this would be immaterial at this scale, and the areas are zoned for mixed use which anticipates residential activity being</p>	<p>Amend as follows:  15.2.3.2 Policy – Mixed use areas <del>outside the central city</del> <b>(except the Central City Mixed Use and Central City Mixed Use (South) Zones)</b></p> <p><b>a.</b> Recognise the existing nature, scale and extent of retail activities and offices <b><u>in mixed use zones outside the central city in Addington, New Brighton, off Mandeville Street and adjoining Blenheim Road</u></b>, while limiting their future growth and development to ensure commercial activity in the City is focussed within the network of commercial centres.</p> <p><b>b.</b> <u>Support mixed use zones at</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>proximate to necessary facilities / employment thereby reducing trip journeys. Support for greater housing diversity and including 'alternative housing models' although noting that these are not well defined (Chapter 2 Interpretation).</p> <p>The greenway requirements in Appendix 15.15.12 and 15.15.13 are problematic to implement given the fragmented ownership of these areas. The provision of small parks and greenlinks is a matter for Council to facilitate through LGA processes and a more comprehensive place-making programme that will be vital in supporting a shift from industrial to mixed use neighbourhoods. If specific greenlinks are considered to be vital then the Council should use its designation powers to secure these spaces as a more efficient and effective method than the proposed comprehensive housing rules.</p>	<p><u>Sydenham, Addington, off Mandeville Street, and Philipstown located within a 15 minute walking distance of the City Centre Zone, to transition into <b>high good</b> quality residential neighbourhoods by:</u></p> <ul style="list-style-type: none"> <li>i. <u>enabling comprehensively designed <b>high-good</b>-quality, high-density residential activity;</u></li> <li>ii. <u>ensuring that the location, form and layout of residential development <b>supports the objective of reducing greenhouse gas emissions and</b> provides for greater housing diversity including alternative housing models;</u></li> <li>iii. <u>requiring developments to achieve a <b>high-good</b> standard of on-site residential amenity <b>to offset and improve the current low amenity industrial environment</b> and mitigate potential conflicts between</u></li> </ul>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p><u>uses;</u></p> <p>iv. <u>encourage small-scale building conversions to residential use where they support sustainable re-use and provide <del>high-good</del> quality living space, and contribute to the visual interest of the area.</u></p> <p><del>c. Avoid Comprehensive Residential Development of sites within the Comprehensive Housing Precinct that are identified in Appendix 15.15.12 and 15.15.13 unless the relevant shared pedestrian/cycleway, greenway or road connection is provided.</del></p> <p>d. <del>For sites identified within Appendix 15.15.12 and 15.15.13 encourage the connection to facilitate convenient and accessible through block connectivity.</del></p>
142.		Objective 15.2.4 – urban form	Support	No changes necessary.	Retain the objective as notified.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
143.		Policy 15.2.4.1 – scale and form	Support in part	<p>The foundation of this policy is found within Policy 3 of the NPS – UD. That Policy requires at clause (a) within city centre zones, building heights and density of urban form to realise as much development capacity as possible. Accordingly, the current wording of clause (i) to (v) which seek to limit building height is not supported.</p> <p>For clause (b)(i) the duplication associated with the amendment can be removed.</p> <p>For clause(b)(ii) it is considered that the District Plan should be forward looking, hence the need for building heights to be commensurate with their 'anticipated' role.</p>	<p>1. Amend Clause (a) as follows:</p> <p><b>15.2.4.1 Policy – Scale and form of development</b></p> <p>a. Provide for development of a <u>significant</u> scale and <del>form</del> <u>massing that reinforces the City's City Centre Zone's distinctive sense of place and a legible urban form <b>by enabling as much development capacity as possible to maximise the benefits of intensification, whilst managing building heights adjoining Cathedral Square, Victoria Street, New Regent High Street and the Arts Centre to account for recognised heritage and character values.</b></u> <del>in the core of District Centres and Neighbourhood Centres, and of a lesser scale and form on the fringe of these centres.</del></p> <p>2. Delete Clause (a)(i)-(v).</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p>1. Amend Clause (b) as follows:</p> <p>b. The scale and form of development in <u>other commercial</u> centres shall:</p> <ul style="list-style-type: none"> <li>i. reflect the context, character and the anticipated scale of the zone and centre's function <u>by:</u></li> <li><del>ii. providing for the tallest buildings and greatest scale of development in the city centre to reinforce its primacy for Greater Christchurch and enable as much development capacity as possible to maximise the benefits of intensification;...</del></li> </ul> <p>2. Retain the remaining parts of clause (b) as notified.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
144.		Policy 15.2.4.2 - design	Oppose	There is no basis within the MDMR Act nor NPS-UD that facilitates or provides support for the inclusion of these provisions. It is considered that the provisions introduced would function to limit or reduce potential development capacity. The provisions are not accompanied by a comprehensive s32, do not adequately recognise the functional requirements associated with commercial developments, and would not be the more appropriate in terms of achieving Objective 3.3.1 and 3.3.2 of the Plan.	Delete all inclusions introduced and retain existing Operative Plan Policy 15.2.4.2.
145.		Policy 15.2.4.6 – Strategic Infrastructure	Support in Part	This policy contains operative plan wordings using the term ‘avoiding’ in relation to noise sensitive activities and the Airport Noise Influence Area, we seek amendment to this wording to reflect management solutions are appropriate.	Amend policy 15.2.4.6 as follows:  Provide for the effective development, operation, maintenance and upgrade of strategic infrastructure and avoid adverse effects of development on strategic infrastructure through managing the location of activities and the design of stormwater areas. This includes but is not limited to, managing noise sensitive activities within commercial zones



ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					located <del>within the 50-dB Ldn Air Noise Contour and</del> within the Lyttelton Port Influences Overlay Area.
146.		Objective 15.2.5(a)(i)	Support in Part	This policy contains existing Operative Plan wording that's no longer appropriate "...and limiting the height of buildings to support an intensity of commercial activity across the zone".	Amend Objective 15.2.5 as follows: <ul style="list-style-type: none"> <li>a. A range of commercial activities, community activities, cultural activities, residential activities and guest visitor accommodation are supported in the Central City to enhance its viability, vitality and the efficiency of resources, while encouraging activities in specific areas by: <ul style="list-style-type: none"> <li>i. Defining the <del>Commercial Central City Business City Centre</del> Zone as the focus of retail activities and offices <del>and limiting the height of buildings to support an intensity of commercial activity across the zone;</del></li> </ul> </li> </ul>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
147.	Central City	Policy 15.2.6.3 - Amenity	Support in part	<p>Deletion of the operative clause (ii) is supported.</p> <p>Seek deletion or amendment of inserted clause (ii) which acts as a proxy to otherwise limit height contrary to the statutory requirement of Policy 3 of the NPS-UD.</p>	<ol style="list-style-type: none"> <li>1. Support the deletion of existing clause (a)(ii).</li> <li>2. Delete the replacement Clause (a)(ii).</li> </ol>
148.	Central City	Policy 15.2.6.4 – Residential intensification	Support in part	<p>Seek moderation of the qualifier 'high quality' to either good, or 'positively contributes'.</p>	<p>Amend Policy 15.2.6.4(a) as follows:</p> <p>Encourage the intensification of residential activity within the <del>Commercial Central City Business City Centre Zone</del> by enabling <b>high-good</b> quality residential development that <b>positively contributes to supports</b> a range of <del>types of</del> residential <del>development typologies, tenures and</del> prices, with an appropriate level of amenity including:...</p>
149.	Central City	Policy 15.2.6.5 – Pedestrian focus	Oppose	<p>Delete the PC14 amendment relating to 'wind generation'. It is not considered that the respective s32 analysis demonstrates that such limits/</p>	<p>Amend Policy 15.2.6.5(ii) as follows:</p> <p>ii. requiring development to support a</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				wind rules are the most efficient or effective method.	pedestrian focus through controls over building location and continuity, weather protection, height, <del>wind generation</del> , sunlight admission, and the location of parking areas;
150.	Central City Mixed Use Zone	Objective 15.2.7 – central city mixed use	Oppose	Delete insertion of reference to 'high quality' as inappropriate in this context.	15.2.7 Objective – Role of the Central City Mixed Use Zone a. The development of vibrant, <del>high</del> <b>good</b> quality urban areas where a diverse and compatible mix of activities can coexist in support of the <del>Commercial Central City Business City Centre Zone</del> and other areas within the <del>Central City Central City</del> .
151.	Central City Mixed Use Zone	Policy 15.2.7.1 – diversity of activities	Support in part	The Central City mixed use zone is well located within easy walking and cycling distance of the wide range of services and facilities on offer. As such the height limit is sought to reflect such proximity and not be tagged or limited to colocation with large faculties, as the whole of the zone is well-	<b><u>Amend Clause (a)(viii) as follows:</u></b> viii. opportunities for taller buildings to <u>accommodate residential activity and visitor accommodation, to support the vibrancy of the City Centre Zone, <del>where</del> <b>co-located with the and the nearby</b> large-scale community facilities, Te Kaha</u>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				located in close proximity to these facilities.	<u>and Parakiore.</u>
152.	Central City Mixed Use Zone	Policy 15.2.8.1 - usability, Policy 15.2.8.2 - amenity	Oppose	<p>The amenity provisions introduced are too fine grain to be set as policies, are unsubstantiated by s32 analysis, do not respond to a resource management issue, and would act as detriment to development. Kāinga Ora seek that these be deleted.</p> <p>Policy 15.2.8.2(viii) is not opposed, subject to the amendments sought above as to setting an appropriate urban design context, and not set at 'high quality'.</p>	<ol style="list-style-type: none"> <li>1. Retain Policy 15.2.8.1 as existing in the Operative Plan and delete all PC14 amendments.</li> <li>2. Retain Policy 15.2.8.2 as existing in the Operative Plan and delete all PC14 amendments, with the exception of clause (viii) which is sought to be retained.</li> </ol>
153.	Central City Mixed Use Zone	Policy 15.2.8.3 – residential development	Oppose	The requirements in the NPS-UD to facilitate differing housing typologies and provide intensification opportunities is disenabled by provisions seeking excessive private amenity space.	<p>Delete amendments seeking improved private amenity space, compensatory to the predominantly commercial nature of the Central City Mixed Use Zone.</p> <p><b>15.2.8.3 Policy Residential Development</b></p> <p>a. provide for ...</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					b. <u>Require a level of private amenity space for residents that is proportionate to the extent of residential activity proposed.</u> <del>and which compensates for the predominantly commercial nature of the area, including</del> consistent with the intended built form and mix of activities within that environment, through:...
154.	Central City Mixed Use Zone (South Frame)	Policy 15.2.10.2 – residential development	Support	Policy amendments appropriately recognise area context.	Retain policy as notified
<b>15.4 – Commercial Zone rules</b>					
155.	Town Centre Zone Rules  Local Centre Rules  Neighbourhood Centre Zone	City Spine Transport Corridor  15.4.1.3(RD8)  15.5.1.3(RD8)  15.6.1.3(RD7)	Oppose	Delete the provision in its entirety. The provision is not justified in terms of s32, is not the most appropriate mechanism to secure increased road widths, or proxy road reserve planting and landscaping at the expense of developable area. Provision and Qualifying matter is not	Delete all City Spine Transport Corridor activity rules from the suite of commercial zones.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
	Large Format Retail Zone  Mixed Use Zone	15.8.1.3(RD3)  15.10.2.10		supported by Policy 4/ clause 3.32 of the NPS-UD. Inconsistency with design outcomes specified in Rule 15.4.2.3, including clause (i) Key Pedestrian Frontages as associated with Riccarton, Church Corner, Merivale and Papanui Centres.  If road widening is required to facilitate rapid transit infrastructure then Council should use its designating powers.	
156.	Town Centre Zone Built Form Standards  Local Centre Built Form Standards	15.4.2.1(a)(ii)  15.5.2.1(a)(i)	Oppose / cl16(b)	Delete erroneous reference to Local Centre in 15.4.2.1(a)(ii)  Delete erroneous reference to Town Centre in 15.5.2.1(a)(i)	<del>ii. 1,000m<sup>2</sup> GLFA where located in a Neighbourhood Local Centre identified in Policy 15.2.2.1, Table 15.1</del>  <del>ii. 4,000m<sup>2</sup> GLFA where located in a District Town Centre as identified in Policy 15.2.2.1, Table 15.1; or</del>
157.	Town Centre Zone Built Form Standards	14.4.2.2 Maximum Building Height	Support in part	Increased development capacity is sought to be enabled specifically at Hornby,	1. Adopt Metropolitan Centre Zone Rules proposed in the Kāinga Ora submission <b>Appendix 2</b> and amend



ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought												
				<p>Riccarton and Papanui noting that the role and function of these centres is already straddling that associated with the role and function of Metropolitan Centres as set out within the National Planning Standards. The adoption of the Metropolitan Centre Rules Kāinga Ora seeks would take into account that role and function (including social amenity) would be anticipated to grow and diversify given the anticipated level of residential catchment growth. An appropriate height limit is accordingly 36m.</p> <p>For the remaining Town Centres, noting anticipated corridor growth and development as associated with Sydenham, Merivale and Church Corner (elevating these centres to Town Centres in the retail hierarchy) (refer submission to Table 15.1) a height limit of 22m is the more appropriate.</p>	<p>these rules as appropriate.</p> <p>2. Amend rule 14.4.2.2 as follows:</p> <p>a. The maximum height of any building shall be as follows:</p> <table><tr><td></td><td><b>Applicable to</b></td><td><b>Standard</b></td></tr><tr><td>i.</td><td>All sites in a <del>District Town Centre (other than specified below)</del></td><td><del>220</del> metres</td></tr><tr><td>ii.</td><td><u>All sites in a Town Centre at Riccarton, or Hornby or Papanui</u></td><td><u>22 metres</u></td></tr><tr><td>iii.</td><td>...</td><td></td></tr></table>		<b>Applicable to</b>	<b>Standard</b>	i.	All sites in a <del>District Town Centre (other than specified below)</del>	<del>220</del> metres	ii.	<u>All sites in a Town Centre at Riccarton, or Hornby or Papanui</u>	<u>22 metres</u>	iii.	...	
	<b>Applicable to</b>	<b>Standard</b>															
i.	All sites in a <del>District Town Centre (other than specified below)</del>	<del>220</del> metres															
ii.	<u>All sites in a Town Centre at Riccarton, or Hornby or Papanui</u>	<u>22 metres</u>															
iii.	...																

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
158.	Town Centre Zone Built Form Standards	Sunlight and Outlook 15.4.2.5	Oppose in part	Refer submission point relating to amended Recession Planes as a Qualifying Matter and changes to Appendix 14.16.2.	Consequential amendments associated with Appendix 14.16.2.
	Local Centre Zone Standards	15.5.2.5			Adopt Metropolitan Centre Zone Rules proposed in the Kāinga Ora submission <b>Appendix 2</b> and amend these rules as appropriate.
	Neighbourhood Centre Zone Standards	15.6.2.4			
	Large Format Zone	15.8.2.4			
	Commercial Office Zone	15.9.2.4			
	Mixed Use Zone	15.10.2.4			
	City Centre Zone	15.11.2.9			
	Central City Mixed Use Zone	15.12.2.6			

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought						
159.	Town Centre Zone Built Form Standards  Local Centre Zone Standards  Neighbourhood Centre Zone Standards  Large Format Zone  Mixed Use Zone  City Centre – Mixed Use Zone	City Spine Transport Corridor 15.4.2.10  15.5.2.10  15.6.2.11  15.8.2.13  15.10.1.3 (RD5)  15.12.2.13 / 15.12.1.3(RD6)	Oppose	Delete the provision in its entirety. The provision is not justified in terms of s32, is not the most appropriate mechanism to secure increased road widths, or proxy road reserve planting and landscaping at the expense of developable area. Provision and Qualifying matter is not supported by Policy 4/ clause 3.32 of the NPS-UD.	Delete all City Spine Transport Corridor built form rules from the suite of commercial zones.						
160	Local Centre Zone Built Form Rules – Maximum Building Height	15.5.2.2		Support in part  As identified in the submission point on Town Centre heights – Merivale, Church Corner and Sydenham are sought to be elevated to a ‘Town Centre’ zone and provided with a 22m height limit.	Replace the table in 15.5.2.2 as follows (with Merivale, Church Corner and Sydenham elevated in Table 15.1 to Town Centre zoning): <table><tr><td></td><td>Applicable to</td><td>Standard</td></tr><tr><td>ii</td><td>Ferrymead and all sites in a Local Centre (medium)</td><td>20 metres</td></tr></table>		Applicable to	Standard	ii	Ferrymead and all sites in a Local Centre (medium)	20 metres
	Applicable to	Standard									
ii	Ferrymead and all sites in a Local Centre (medium)	20 metres									

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought												
				<p>In the alternative, they are sought to be afforded a 22m height limit as Local Centre (Large).</p> <p>As sought above the remaining medium centres and Ferrymeed are sought to become 'large' Local Centres, with the 'small' Local Centres simply being 'local centres'.</p> <p>In terms of heights, the new large centres are sought to have a consistent 22m height limit to provide for additional capacity and conformity with the proposed HRZ height limits adjoining these centres within this submission. The exception is New Brighton, given qualifying matters associated with appropriate natural hazards reduce intensification opportunities.</p> <p>All remaining Neighbourhood Centres are sought to have a standard height limit of 14m to provide a scale commensurate</p>	<table><tr><td></td><td><u>as identified in Table 15.1 of Policy 15.2.2.1, excluding New Brighton.</u></td><td></td></tr><tr><td>ii.</td><td><u>New Brighton and all sites in a Local Centre (small) as identified in Table 15.1 of Policy 15.2.2.1</u></td><td><u>14metres</u></td></tr></table> <p>Or in the alternative:</p> <p>15.5.2.2 Maximum building height</p> <p>a. The maximum height of any building shall be as follows:</p> <table><tr><th></th><th>Applicable to</th><th>Standard</th></tr><tr><td>i</td><td><u>Merivale, Church Corner and Sydenham North (Colombo Street between Brougham Street and Moorhouse Avenue)</u></td><td><u>22 metres</u></td></tr></table>		<u>as identified in Table 15.1 of Policy 15.2.2.1, excluding New Brighton.</u>		ii.	<u>New Brighton and all sites in a Local Centre (small) as identified in Table 15.1 of Policy 15.2.2.1</u>	<u>14metres</u>		Applicable to	Standard	i	<u>Merivale, Church Corner and Sydenham North (Colombo Street between Brougham Street and Moorhouse Avenue)</u>	<u>22 metres</u>
	<u>as identified in Table 15.1 of Policy 15.2.2.1, excluding New Brighton.</u>																
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ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought															
				with the surrounding MRZ areas and to differentiate from the 12m height limit applying to Neighbourhood Centres.	<table><tr><td>ii</td><td><u>Ferryhead</u> and all sites in a Local Centre (medium) as identified in Table 15.1 of Policy 15.2.2.1, excluding New Brighton.</td><td>20 metres</td></tr><tr><td>ii.</td><td>New Brighton and all sites in a Local Centre (small) as identified in Table 15.1 of Policy 15.2.2.1</td><td>14 metres</td></tr><tr><td>i. —</td><td>All sites in a District Centre</td><td>20 metres</td></tr><tr><td>ii.</td><td>Any building in a District Centre within 30 metres of an internal boundary with a residential zone</td><td>12 metres</td></tr><tr><td>iii. i.</td><td><u>All sites in a Neighbourhood Local Centre (small) as identified in Table 15.1 of Policy 15.2.2.1.</u></td><td><u>12 metres</u></td></tr></table>	ii	<u>Ferryhead</u> and all sites in a Local Centre (medium) as identified in Table 15.1 of Policy 15.2.2.1, excluding New Brighton.	20 metres	ii.	New Brighton and all sites in a Local Centre (small) as identified in Table 15.1 of Policy 15.2.2.1	14 metres	i. —	All sites in a District Centre	20 metres	ii.	Any building in a District Centre within 30 metres of an internal boundary with a residential zone	12 metres	iii. i.	<u>All sites in a Neighbourhood Local Centre (small) as identified in Table 15.1 of Policy 15.2.2.1.</u>	<u>12 metres</u>
ii	<u>Ferryhead</u> and all sites in a Local Centre (medium) as identified in Table 15.1 of Policy 15.2.2.1, excluding New Brighton.	20 metres																		
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ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought									
					<table><tr><td>iv.</td><td><del>Other locations</del></td><td><del>17 metres</del></td></tr><tr><td>ii.</td><td><del>All sites in a Neighbourhood Local Centre (medium) as identified in Table 15.1 of Policy 15.2.2.1.</del></td><td><del>14 metres</del></td></tr><tr><td>iii.</td><td><del>All sites in a Neighbourhood Local Centre (large) as identified in Table 15.1 of Policy 15.2.2.1.</del></td><td><del>20 metres</del></td></tr></table>	iv.	<del>Other locations</del>	<del>17 metres</del>	ii.	<del>All sites in a Neighbourhood Local Centre (medium) as identified in Table 15.1 of Policy 15.2.2.1.</del>	<del>14 metres</del>	iii.	<del>All sites in a Neighbourhood Local Centre (large) as identified in Table 15.1 of Policy 15.2.2.1.</del>	<del>20 metres</del>
iv.	<del>Other locations</del>	<del>17 metres</del>												
ii.	<del>All sites in a Neighbourhood Local Centre (medium) as identified in Table 15.1 of Policy 15.2.2.1.</del>	<del>14 metres</del>												
iii.	<del>All sites in a Neighbourhood Local Centre (large) as identified in Table 15.1 of Policy 15.2.2.1.</del>	<del>20 metres</del>												
161.	Neighbourhood Centre Zone – Built Form Standards	15.6.2.1 - Height	Support in part	<p>The increase in height of buildings from 8m to 12m is supported.</p> <p>Within the Central City, an increased height to 32m is the more appropriate, given these areas are surrounded by HRZ.</p>	<p>Amend rule 15.6.2.1 as follows:</p> <p>15.6.2.1 Maximum Building Height</p> <p><b>a.</b> The maximum height of any building shall be as follows:</p> <table><tr><th></th><th>Applicable to</th><th>Standard</th></tr><tr><td>i.</td><td>All sites unless specified below</td><td>8 <u>12</u> metres</td></tr><tr><td>ii.</td><td><u>For sites within the Central City</u></td><td></td></tr></table>		Applicable to	Standard	i.	All sites unless specified below	8 <u>12</u> metres	ii.	<u>For sites within the Central City</u>	
	Applicable to	Standard												
i.	All sites unless specified below	8 <u>12</u> metres												
ii.	<u>For sites within the Central City</u>													



ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought		
					<table><tr><td><del>located:</del> <del>a. To the east of Barbadoes Street</del> <del>b. To the west of Barbadoes Street</del></td><td><del>20m</del>  <del>32m</del></td></tr></table>	<del>located:</del> <del>a. To the east of Barbadoes Street</del> <del>b. To the west of Barbadoes Street</del>	<del>20m</del>  <del>32m</del>
<del>located:</del> <del>a. To the east of Barbadoes Street</del> <del>b. To the west of Barbadoes Street</del>	<del>20m</del>  <del>32m</del>						
162.	Mixed Use Zone	15.10.1.1 Activity rules	Support in Part	<p>Support the enablement of residential in P27, subject to deletion of the ‘Comprehensive Housing Precinct’.</p> <p>The rule framework does not enable the suite of community activities that are inherent in good quality mixed use neighbourhoods. The rule framework must enable activities such as preschools, education, spiritual, health, community faculties, and convenience retail to support the emergence of a genuinely mixed use neighbourhood. The activity standards for these activities in the MRZ are equally</p>	<ol style="list-style-type: none"><li>1. Amend P27 to delete clause (b) relating to the Comprehensive Housing Precinct.</li><li>2. Add additional activity rules enabling a suite of community activities i.e. rules 14.5.1.1 P5-P13, P20.</li></ol>		

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>appropriate and set appropriate limits on activity size to ensure effects of larger facilities are able to be assessed.</p> <p>Such activities do not generally give rise to retail distribution effects, and will not give rise to reverse sensitivity effects given the clear change in outcomes sought for these areas and the enablement of residential activity throughout the mixed use zone.</p>	
163.	Mixed Use Zone	15.10.2.1 - Height	Support in part	<p>The insertion of (b) providing for higher intensity of residential development is supported. However a height limit of 22m is considered the more appropriate for consistency with the height limits proposed within this submission, and appropriate levels of enablement, along with the unnecessary need to differentiate between the heights of buildings depending on where they are located on the site.</p>	<p>Amend rule 15.10.2.1 as follows:</p> <p>Maximum building height</p> <ul style="list-style-type: none"> <li>a. The maximum height of any building shall be 15 metres, <u>unless specified below.</u></li> <li>b. <u>The maximum height of any Comprehensive Residential Development located within the Comprehensive Housing Precinct (shown on the</u></li> </ul>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p><u>planning maps) shall be <del>21</del> 22 metres, <del>for buildings located adjacent to the street, or 12 metres for buildings located at the rear of the site.</del></u></p>
164.	Mixed Use Zone – Comprehensive Residential Development	<p>15.10.1.1(P27)</p> <p>15.10.1.3 (RD3 / RD4) Comprehensive Residential Development</p> <p>15.10.2.9 Minimum Standards for Comprehensive Residential Development.</p> <p>15.14.3.40 Assessment Matters Comprehensive Redevelopment</p> <p>15.10.1.5(NC3)</p> <p>Appendix 15.15.12 – Sydenham and Appendix 15.15.13. Appendix 15.15.14</p>	Oppose	<p>These provisions are overtly complicated, unworkable and provide inappropriate mechanisms to manage development and acquire public laneways (Appendix 15.15.12 – Sydenham and Appendix 15.15.13).</p> <p>Clarity needs to be improved in (P27) that those provisions apply to all MUZ except:</p> <ul style="list-style-type: none"> <li>(i) Blenheim Road / Main South Road 15.10.1.4(D1); and</li> <li>(ii) Comprehensive Housing Precinct (15.10.1.3 (RD3) and (RD4).</li> </ul>	<p>Delete all existing provisions and provide a suite of workable and clear rules that encourage and enable large scale redevelopment.</p> <p>Remove statutory impediments in Appendix 15.15.12 – Sydenham and Appendix 15.15.13 requiring ‘Greenways’ and ‘Shared Pedestrian / Cycleways’ and seek to facilitate through more appropriate means – such as negotiated purchase.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>Reference in 15.10.1.3(RD3) to 15.14.3.40(a)(iv) and (v) is incorrect, as these provisions do not exist.</p> <p>The respective matters identified in relation to 15.10.1.3(RD4) are overly excessive and broad.</p> <p>15.10.1.5(NC3) has the statutory function of deeming all Comprehensive Residential Development within the precinct identified for such (at Appendix 15.15.12 and 15.15.13) non-complying. This inconsistency and error needs to be corrected.</p> <p>The matters expressed in 15.14.3.40 are overly excessive and broad (effectively not restricting the matters to be assessed), lack certainty of achievement, and are absent a resource management purpose. Collectively these matters are the antithesis of the achievement of Objective 3.3.1</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>and Objective 3.3.2 and will disenable investment and redevelopment. Reference is sought to be made to a good quality living environment that positively contributes to local amenity as a high quality environment is contextually unobtainable in a transitioning Mixed Use Environment.</p> <p>The requirements in Appendix 15.15.12 – Sydenham and Appendix 15.15.13. Appendix 15.15.14 are not the most appropriate in terms of s32 of the Act, and will act to disenable redevelopment and the purpose of the Zone.</p>	
165.	Central City Zone	15.11.1.1(P18) – Small buildings	Support	Support the introduction of a permitted pathway for small buildings where the built form rules and activity standards are sufficient to deliver acceptable urban design outcomes and the need for a separate urban design assessment/ consent is able to be avoided.	Retain P18 as notified.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
166.	Central City Zone	15.11.1.2(C1)	Oppose	<p>Additions to C1 are not in accordance with the statutory requirements of the NPS-UD, Sections 77G or 77H of the Resource Management Act, nor Objective 3.3.1 and 3.3.2 of the Plan. The provisions would act as proxies to otherwise reduce development capacity.</p> <p>The Operative Plan controlled activity status for urban design assessments is sought to be retained.</p>	Delete proposed PC14 amendments to the rule i.e. retain the Operative Plan provision.
167.	Central City Zone  Central City Mixed Use Zone	Residential Activity  15.11.1.3(RD4) Matters (b) and (c)  15.12.1.3(RD)(b) and (c)	Oppose	<p>Additional controls are unnecessary and inappropriate. These matters are able to be addressed by existing matters (i.e 15.14.2.9(b) and 15.14.2.9(d).</p>	<p>Amend the rule by deleting clauses (b) and (c) as follows:</p> <p>a. Residential activity in the <del>Commercial Central City Business City Centre</del> and Central City Mixed Use Zones – Rule 15.134.2.9</p> <p><del>b. Glazing – 15.14.3.37</del></p> <p><del>c. Outlook spaces – 15.14.3.38.</del></p>
168.	Central City Zone	Buildings  15.11.1.3(RD5)	Oppose	<p>As a consequential amendment to the relief sought in this submission to delete various</p>	<p>Amend rule by deleting clauses (m) and (n) as follows:</p> <p><del>m. Upper floor setbacks, tower</del></p>



ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought			
				built form rules, the activity status rule also needs amending to remove reference to rule breaches with the built form rules on wind, upper floor setbacks and tower dimension.	<del>dimension and site coverage – Rule 15.14.3.35</del> <del>n. Wind – Rule 15.14.3.39</del>			
169.	Central City Zone	Sunlight and Outlook for the street 15.11.2.3	Oppose	Acts as a proxy to limit development capacity in the Central City in a manner that is not founded in the NPS-UD Policy 3.	Delete rule			
170.	Central City Zone	Building Height – 15.11.2.11	Support in part	<p>There is an inconsistency between the definition of Building Base and the rule. The definition of Building Base is sought to be deleted, as it is internally inconsistent with provisions in the Plan and is uncertain in purpose.</p> <p>Building Base is defined as: <i>‘In respect to the City Centre and Central City Mixed Use Zones, means any part of any building that is below the maximum permitted height for that type of building in the zone’.</i></p>	<p>1. Amend definition of Building Base as:</p> <p><del>Building Base: In respect to the City Centre and Central City Mixed Use Zones, means any part of any building that is below the maximum permitted height for that type of building in the zone.</del></p> <p>2. Amend rule as follows:</p> <table><tr><td></td><td>Applicable to</td><td>Standard</td></tr></table>		Applicable to	Standard
	Applicable to	Standard						

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought									
					<table><tr><td>i.</td><td>All buildings, except as provided for in ii, <del>and</del> iii <b>and iv</b> below.</td><td><b>A.</b> The maximum height shall be <u>90 metres</u>. <b><del>B.</del></b> <del>The <u>maximum height of the building base shall be 28 metres.</u></del>  in accordance with the Central City Maximum Building Height planning map</td></tr><tr><td>ii.</td><td>All buildings in the <u>heritage setting</u> of New Regent Street as identified in <u>Appendix 9.3.7.2.</u></td><td>The minimum and maximum height shall be 8 metres.</td></tr><tr><td>iii.</td><td>All buildings at the Arts Centre, being land bordered by Montreal Street,</td><td>The maximum height shall be 16 metres.</td></tr></table>	i.	All buildings, except as provided for in ii, <del>and</del> iii <b>and iv</b> below.	<b>A.</b> The maximum height shall be <u>90 metres</u> . <b><del>B.</del></b> <del>The <u>maximum height of the building base shall be 28 metres.</u></del>  in accordance with the Central City Maximum Building Height planning map	ii.	All buildings in the <u>heritage setting</u> of New Regent Street as identified in <u>Appendix 9.3.7.2.</u>	The minimum and maximum height shall be 8 metres.	iii.	All buildings at the Arts Centre, being land bordered by Montreal Street,	The maximum height shall be 16 metres.
i.	All buildings, except as provided for in ii, <del>and</del> iii <b>and iv</b> below.	<b>A.</b> The maximum height shall be <u>90 metres</u> . <b><del>B.</del></b> <del>The <u>maximum height of the building base shall be 28 metres.</u></del>  in accordance with the Central City Maximum Building Height planning map												
ii.	All buildings in the <u>heritage setting</u> of New Regent Street as identified in <u>Appendix 9.3.7.2.</u>	The minimum and maximum height shall be 8 metres.												
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ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought									
					<table><tr><td></td><td>Worcester Street, Rolleston Avenue and Hereford Street.</td><td></td></tr><tr><td>iv</td><td>All buildings within the Cathedral Square Height Precinct</td><td><p>A. The maximum height shall be 45 metres.</p><p><del>B. The maximum height of the building base shall be 28 metres.</del></p></td></tr><tr><td>v.</td><td>All buildings within the Victoria Street Height Precinct</td><td><p>A. The maximum height shall be 45 metres.</p><p><del>B. The maximum height of the building base shall be 28 metres.</del></p></td></tr></table>		Worcester Street, Rolleston Avenue and Hereford Street.		iv	All buildings within the Cathedral Square Height Precinct	<p>A. The maximum height shall be 45 metres.</p> <p><del>B. The maximum height of the building base shall be 28 metres.</del></p>	v.	All buildings within the Victoria Street Height Precinct	<p>A. The maximum height shall be 45 metres.</p> <p><del>B. The maximum height of the building base shall be 28 metres.</del></p>
	Worcester Street, Rolleston Avenue and Hereford Street.													
iv	All buildings within the Cathedral Square Height Precinct	<p>A. The maximum height shall be 45 metres.</p> <p><del>B. The maximum height of the building base shall be 28 metres.</del></p>												
v.	All buildings within the Victoria Street Height Precinct	<p>A. The maximum height shall be 45 metres.</p> <p><del>B. The maximum height of the building base shall be 28 metres.</del></p>												

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<div> <div>vi. All buildings in the Central City Heritage Qualifying Matter and Precinct, including the following areas:</div> <div>...</div> <div>The maximum height shall be 28 metres.</div> </div>
171.	Central City Zone	Maximum Road Wall Height - 15.11.2.12  Building Tower Setbacks - 15.11.2.14  Maximum building tower dimension and building tower coverage – 15.11.2.15  15.11.2.16 Minimum building tower separation  15.11.2.17 Wind	Oppose	<p>These provisions, both individually and collectively act as proxies to restrict height and associated development capacity in the Central City Zone.</p> <p>The retention (and addition) of height rules in the City Centre zone simply does not give effect to the NPS-UD Policy 3 direction to “enable in city centre zones, building heights and density of urban form to realise as much development capacity as possible, to maximise benefits of intensification.</p>	Delete all these provisions.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>The proposed wind standards are inappropriate (as set between 4m/s to 6m/s more than 5% annually at ground level within 100m of a proposal.) The Technical data used in support of the provision identifies that measured wind levels already typically exceed these levels without development. There is no supporting s32 considering the benefits and costs associated with this provision.</p> <p><i>“Christchurch is a relatively windy city with a background mean wind speed of about 4 m/s (at 10 m above the ground). At the airport for example, the mean wind speed exceeds 4 m/s about 45% of the time, exceeds 6 m/s about 21% of time, and exceeds 8 m/s about 11% of the time”.<sup>1</sup></i></p>	
172.	Central City Mixed Use Zone	15.12.1.1(P16)(a)(iii)	Oppose	Delete as this matter is appropriately managed through	Amend rule by deleting clause (a)(iii).

<sup>1</sup> Technical Advice for Wind Assessments for Christchurch Cit. Meteorology Solutions (2022). [Section 2. Context]

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				screening and controls in Rule 15.12.2.5 'Screening'	
173.	Central City Mixed Use Zone	15.12.1.1(P16)(c)(iii)	Oppose	Requirement is seen as excessive within this context as these areas are not necessarily mutually exclusive.	Amend rule by deleting clause (c)(iii).
174.	Central City Mixed Use Zone	15.12.1.1(P16)(j)	Oppose	This requirement is seen as excessive within this context as a higher density of residential activity should be encouraged, with standards for outdoor and communal living space being used to provide appropriate levels of amenity.	Amend rule by deleting clause (j).
175.	Central City Mixed Use Zone	15.12.1.3(RD2) – Buildings	Oppose	Additional matters of discretion associated with Upper Floor Setbacks, and Glazing are unnecessary and not the more appropriate provisions.	Amend rule by deleting clauses (k) upper floor setbacks and (l) glazing.
176.	Central City Mixed Use Zone	15.12.1.3(RD4) – Four or more residential units	Oppose	Matters of discretion associated with Upper Floor Setbacks, and Glazing are unnecessary and not the more appropriate provisions. The matters in 15.5.1 are considered	Amend rule by deleting clauses (b) outdoor living space and (c) glazing.



ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				appropriately broad to ensure an appropriate balance between private, communal and public amenity.	
177.	Central City Mixed Use Zone	15.12.2.1 'Street scene, landscaping and trees'	Oppose	The proposed landscaping requirements are excessive and inappropriately reduce development opportunities. The operative plan rule is sought to be retained and PC14 amendments deleted.	Delete PC14 amendments and retain operative plan rule.
178.	Central City Mixed Use Zone	15.12.2.2	Support in part	<p>The maximum height of 32m is supported as being appropriately enabling within a proximate distance to the City Centre Zone.</p> <p>The restrictions associated with the rule are opposed as being unnecessary, in conjunction with the absence of clarity in the definition associated with 'building base' as discussed in this submission.</p>	<p>Amend the rule as follows:</p> <p>15.12.2.2 Maximum building height</p> <p>a. <del>The maximum height of any building shall be in accordance with the height specified</del> <u>Unless identified on the Central City Maximum Building Height planning map the maximum height of any building shall be 32 metres.</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p><del>b. The maximum height of any building base shall be 17 metres.</del></p> <p>b. Any application arising from this rule shall not be limited or publicly notified.</p>
179.	Central City Mixed Use Zone	15.12.2.7 – Minimum setback from the boundary	Oppose	It is considered that the inserted requirements are unnecessary, and unduly constraining.	Delete PC14 amendments and retain operative plan rule.
180.	Central City Mixed Use Zone	15.12.2.9 – Minimum number of floors	Oppose	Whilst a minimum requirement of two floor levels is appropriate in the zone to increase intensity of development, the zone provides for a wide variety of uses, not all of which are appropriate in multi-storey buildings. As such single storey buildings may well be appropriate in a mixed use environment.	Delete proposed rule.
181.	Central City Mixed Use Zone	15.12.2.10 – Building Setbacks	Oppose	Requirements associated with internal setbacks between building towers is unnecessary.	Amend the rule by deleting clauses (b) and (c).

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
182.	Central City Mixed Use Zone	15.12.2.11 – Building Tower Coverage	Oppose	Considered unnecessary and would inappropriate disenable development capacity for no sound resource management purpose.	Delete the rule.
183.	Central City Mixed Use Zone	15.12.2.12 – Glazing	Oppose	Considered unnecessary and would inappropriate disenable development capacity for no sound resource management purpose	Delete the rule.
184.	Central City Mixed Use Zone (South Frame)	15.12.1.1(P13)(a)(iii)	Oppose	Delete as this matter is appropriately managed through screening and controls in Rule 15.12.2.5 'Screening'	Amend the rule by deleting clause (a)(iii).
185.	Central City Mixed Use Zone (South Frame)	15.12.1.1(P13)(d)(iii)	Oppose	Requirement is seen as excessive within this context as these areas are not necessarily mutually exclusive.	Amend the rule by deleting clause (d)(iii).
	Central City Mixed Use Zone (South Frame)	15.12.1.1(P13)(f)(g)(j)	Oppose	Increasing the extent of setbacks is not more appropriate within this context, revert to the operative Plan rule.	<ol style="list-style-type: none"> <li>1. Amend the rule by retaining the operative Plan wording for clause (f).</li> <li>2. Delete clauses (g) and (j).</li> </ol>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				Clause (j) is seen as excessive within this context as a higher density of residential activity should be encouraged, with standards for outdoor and communal living space being used.	
186.	Central City Mixed Use Zone – South Frame	15.13.1.3(RD4)	Oppose	Assessment matters for Glazing and Outdoor Space are excessive and appropriate matters are contained within Provision 15.14.2.10.	Amend the rule by deleting clauses (b) – glazing and (c) – outlook.
187.	Central City Mixed Use Zone – South Frame	15.13.1.3(RD5)	Oppose	Assessment matters for Upper floor setbacks and glazing are excessive.	Amend the rule by deleting clauses (l) – upper floor setbacks and (m) – glazing.
188.	Central City Mixed Use Zone – South Frame	15.13.2.1	Support in part	<p>The maximum height of 32m is supported as being appropriately enabling within a proximate distance to the City Centre Zone.</p> <p>The restrictions associated with is opposed as unnecessary, in conjunction with the absence of clarity in the definition associated with ‘building base’</p>	<p>Delete the rule and replace as follows:</p> <p><u>The maximum height of all buildings shall be 32m.</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				as discussed in this submission.  The provision as associated with notification is sought to be consistent with that associated with the Central City – Mixed Use zone.	Retain clause (b).
189.	Central City Mixed Use Zone – South Frame	15.13.2.4(f) 'Street scene, landscaping and trees'	Oppose	The requirement for a minimum area of tree canopy of 4m <sup>2</sup> is excessive and inappropriately, it reduces development opportunities.	Amend the rule by deleting the PC14 amendments and retaining the Operative Plan rule wording.
190.	Central City Mixed Use Zone – South Frame	15.13.2.10 – Building Tower Setbacks  15.13.2.11 – Building Tower Coverage  15.13.2.12 – Glazing	Oppose	Considered unnecessary and would reduce development capacity for no sound resource management purpose.	Delete rules 15.13.2.10 – tower setbacks, 15.13.2.11 – tower coverage, and 15.13.2.12 -glazing.
191.	Assessment Matters	15.14.3.1	Oppose	Additional assessment matters set out in clause (b) are unnecessary as the key issues are already addressed in clause (a), or are matters to be deleted	Delete clause (b), with the exception of clause (v) (subject to the below amendment):  v. <u>The individual or cumulative</u>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				as a consequential amendment in association with the submission seeking the deletion of street wall, wind, and tower rules.	<u>effects of shading, visual bulk and dominance, <del>and reflected heat from glass</del> on sites in adjoining residential zones or on the character, quality and use of public open space and in particular the Ōtākaro Avon River corridor, Earthquake Memorial, Victoria Square and Cathedral Square;</u>
192.	Assessment Matters	<p>15.14.3.35 – Upper Floor Setbacks</p> <p>15.14.3.36 – height in Central City Mixed Use Zone</p> <p>15.14.3.37 Glazing</p> <p>15.14.3.38 Outdoor Spaces</p> <p>15.14.3.39 Wind</p> <p>15.14.3.40 – Comprehensive Residential Development in the Mixed Use Zones</p> <p>15.14.5.3 City Spine Transport Corridor</p>	Oppose	Additional controls are unnecessary, subjective and overly broad. These matters are all addressed by Rule 15.14.2.6 'Urban Design'. Deletion of the assessment matters sought as a consequential amendment associated with the submission seeking the deletion of the upper floor setback rule.	<p>Delete the following assessment matters:</p> <p>15.14.3.35 – upper floor setbacks</p> <p>15.14.3.36 – height in Central City Mixed Use Zone</p> <p>15.14.3.37 Glazing</p> <p>15.14.3.38 Outdoor Spaces</p> <p>15.14.3.39 Wind</p> <p>15.14.3.40 – Comprehensive Residential Development in the Mixed Use Zones</p> <p>15.14.5.3 City Spine Transport Corridor</p>



## **Appendix 2: Metropolitan Centre Zone Rules**

The following Metropolitan Centre Zone Rules set out proposed amendments sought from Kāinga Ora to Plan Change 14, to incorporate rules to enable the classification of Hornby, Papanui and Riccarton as Metropolitan Centre Zones

Proposed changes in zoning are highlighted in dark blue.

## MCZ - Metropolitan Centre Zone

The Christchurch Metropolitan Centres are commercial centres with a focal point as sub-regional centres of Papanui, Riccarton and Hornby. They have a planned urban built environment that reflects a high density built form with high-quality public spaces. The Metropolitan Centre Zone provides for a diverse range of commercial, retail, community and recreational activities and offers a variety of employment and living opportunities.

The Metropolitan Centre Zone implements the National Policy Statement on Urban Development, by enabling a built form and density that reflects demand for housing and business use in sub-regional centres.

Activities and buildings along identified active street frontages interact with the streets and public spaces and contribute to a vibrant and attractive metropolitan centre. New buildings and development are well designed and reflect the high-quality urban environment.

Objectives
<p><b>MCZ-O1 Purpose of the Metropolitan Centre Zone</b></p> <p>The Metropolitan Centre Zone:</p> <ol style="list-style-type: none"> <li>1. Is Christchurch's secondary commercial, civic and community centres; and</li> <li>2. Accommodates a wide range of commercial, community, recreational and residential activities.</li> </ol>
<p><b>MCZ-O2 Planned urban built environment of the Metropolitan Centre Zone</b></p> <p>The planned urban built environment of the Metropolitan Centre Zone is characterised by:</p> <ol style="list-style-type: none"> <li>1. A built form that is compact and reflects the high-density environment of the Metropolitan Centre;</li> <li>2. A built environment that is versatile, well designed and of high quality and contributes to attractive and safe public spaces; and</li> <li>3. An urban environment that is an attractive place to live, work and visit.</li> </ol>
Policies
<p><b>MCZ-P1 Appropriate activities</b></p> <p>Enable activities that are compatible with the purpose of the Metropolitan Centre Zone.</p>
<p><b>MCZ-P2 Location of residential activity</b></p> <p>Enable residential activity where:</p> <ol style="list-style-type: none"> <li>1. It is located above ground floor; and</li> <li>2. It provides for an ongoing active street frontage with a positive interface with the public space.</li> </ol>
<p><b>MCZ-P3 Health and well-being for residential activity</b></p> <p>Ensure residential activity and residential units achieve a healthy urban built environment that provides for people's amenity and well-being in respect of:</p> <ol style="list-style-type: none"> <li>1. Access to sunlight, daylight and outdoor living space; and</li> <li>2. Privacy and site design.</li> </ol>

<p><b>MCZ-P4 Other activities</b></p> <p>Provide for other activities within the Metropolitan Centre Zone where:</p> <ol style="list-style-type: none"> <li>1. Any significant adverse effects, can be avoided, remedied or mitigated; and</li> <li>2. The activity is consistent with the planned urban built environment and purpose of the zone.</li> </ol>
<p><b>MCZ-P5 Inappropriate activities</b></p> <p>Avoid activities that are incompatible with the purpose of the Metropolitan Centre Zone.</p>
<p><b>MCZ-P6 Small scale built development</b></p> <p>Enable repairs, alterations and additions to existing buildings and structures, and the erection of smaller-scale buildings and structures, that achieve the planned urban built environment for the Metropolitan Centre Zone.</p>
<p><b>MCZ-P7 Larger scale built development</b></p> <p>Provide for high-density development that achieves a quality built form, taking into consideration the following design objectives and the planned urban built environment of the zone.</p> <ol style="list-style-type: none"> <li>1. Buildings are well-designed and contribute to a high-quality vibrant public realm through visual interest and aesthetic coherence achieved through façade design, materials, and active edges;</li> <li>2. Buildings abut the street edge and define and enclose the streets, and define the edges of open space;</li> <li>3. Street corners are legible and enhanced through architectural treatment and form and maximised activity;</li> <li>4. Pedestrian amenity is maximised through good permeability and activation, which contributes to safety and walkability;</li> <li>5. Servicing and parking are subservient to the built form to maximise an attractive and active pedestrian interface at the street edge;</li> <li>6. Servicing plant is integrated within the architectural design, to avoid an 'add on' appearance and ensure a well-designed top to buildings;</li> <li>7. Residential activity is provided with a high quality living environment, including access to privacy, outlook, and sun access;</li> <li>8. Development responds to the positive contextual elements (existing and potential) including neighbouring buildings, elements such as trees and crossing points in the street</li> </ol>
<p><b>MCZ-P8 Public space interface</b></p> <p>Where located along an active street frontage identified on the planning maps, require development to provide a positive interface with the public space through:</p> <ol style="list-style-type: none"> <li>1. Buildings that are built up to the front boundary of the site;</li> <li>2. Continuous active street frontages;</li> <li>3. Verandas or other forms of pedestrian shelter;</li> <li>4. Transparent glazing on the ground floor that allows visibility into and out of commercial frontages and reflects whether it is a primary or secondary frontage;</li> <li>5. Obvious and highlighted public entrances; and</li> <li>6. Visually unobtrusive parking, storage and servicing areas, preferably within or to the rear of the building.</li> </ol>
<p><b>MCZ-P9 Car parking and parking lots</b></p> <p>Only allow for ground level car parking and parking lots where:</p> <ol style="list-style-type: none"> <li>1. It is not located along a primary frontage identified on the planning maps; and</li> </ol>

2. Any adverse effects on the amenity and quality of the streetscape and public open spaces can be minimised.

Rules	
	<p><b>MCZ-R1      New buildings and structures, and alterations, repairs and additions to existing buildings and structures</b></p> <p>1. Activity status: <b>Permitted</b></p> <p>Where:</p> <ul style="list-style-type: none"> <li>a. The gross floor area of the new building, structure or addition to an existing building or structure is no more than 450m<sup>2</sup>; and</li> <li>b. Compliance is achieved with: <ul style="list-style-type: none"> <li>i. MCZ-S1;</li> <li>ii. MCZ-S2;</li> <li>iii. MCZ-S4; and</li> <li>iv. MCZ-S5.</li> </ul> </li> </ul> <p>Except that:  MCZ-S1, MCZ-S4 and MCZ-S5 do not apply to alterations and repairs to existing buildings and structures.</p>
	<p>2. Activity status: <b>Restricted discretionary</b></p> <p>Where:</p> <ul style="list-style-type: none"> <li>a. Compliance is not achieved with MCZ-R1-1.a.</li> </ul> <p>Matters of discretion are restricted to:</p> <ul style="list-style-type: none"> <li>1. The matters in MCZ-P7.</li> </ul> <p>Notification:</p> <p>An application under this rule is precluded from being publicly and limited notified in accordance with sections 95A and 95B of the RMA.</p>
	<p>3. Activity status: <b>Restricted discretionary</b></p> <p>Where:</p> <ul style="list-style-type: none"> <li>a. Compliance is not achieved with MCZ-R1-1.b.</li> </ul> <p>Matters of discretion are restricted to:</p> <ul style="list-style-type: none"> <li>1. The matters of discretion of the infringed standard.</li> </ul> <p>Notification:</p> <p>An application under this rule where compliance is not achieved with MCZ-S2, MCZ-S3, MCZ-S4, or MCZ-S5 is precluded from being publicly</p>

	notified in accordance with section 95A of the RMA.
<b>MCZ-R2</b>	<b>Construction activity</b> 1. Activity status: <b>Permitted</b>
<b>MCZ-R3</b>	<b>Retail activity</b> 1. Activity status: <b>Permitted</b>
<b>MCZ-R4</b>	<b>Commercial service activity</b> 1. Activity status: <b>Permitted</b>
<b>MCZ-R5</b>	<b>Office</b> 1. Activity status: <b>Permitted</b>
<b>MCZ-R6</b>	<b>Entertainment activity</b> 1. Activity status: <b>Permitted</b>
<b>MCZ-R7</b>	<b>Recreation activity</b> 1. Activity status: <b>Permitted</b>
<b>MCZ-R8</b>	<b>Gymnasium</b> 1. Activity status: <b>Permitted</b>
<b>MCZ-R9</b>	<b>Food and beverage outlet</b> 1. Activity status: <b>Permitted</b>
<b>MCZ-R10</b>	<b>Healthcare activity</b> 1. Activity status: <b>Permitted</b>
<b>MCZ-R11</b>	<b>Educational facility</b> 1. Activity status: <b>Permitted</b>
<b>MCZ-R12</b>	<b>Community facility</b> 1. Activity status: <b>Permitted</b>
<b>MCZ-R13</b>	<b>Visitor accommodation</b> 1. Activity status: <b>Permitted</b>
<b>MCZ-R14</b>	<b>Residential activity including Papakāinga/Kāinga Nohoanga</b> 1. Activity status: <b>Permitted</b> Where: a. Compliance is achieved with: i. MCZ-S3.
	2. Activity status: <b>Restricted discretionary</b>

	<p>Where:</p> <p>a. Compliance is not achieved with MCZ-S3.</p> <p>Matters of discretion are restricted to</p> <p>1. The matters of discretion of the infringed standard.</p> <p><b>Notification:</b></p> <p>An application under this rule is precluded from being publicly notified in accordance with section 95A of the RMA.</p>
	<p><b>MCZ-R15 Social Housing Complex</b></p> <p>1. Activity status: <b>Permitted</b></p>
	<p><b>MCZ-R16 Community corrections activities</b></p> <p>1. Activity status: <b>Permitted</b></p>
	<p><b>MCZ-R17 Conservation activity</b></p> <p>1. Activity status: <b>Permitted</b></p>
	<p><b>MCZ-R18 Customary harvesting</b></p> <p>1. Activity status: <b>Permitted</b></p>
	<p><b>MCZ-R19 Large format retail activity</b></p> <p>1. Activity status: <b>Permitted</b></p>
	<p><b>MCZ-R20 Supermarket</b></p> <p>1. Activity status: <b>Permitted</b></p>
	<p><b>MCZ-R21 Emergency service facility</b></p> <p>1. Activity status: <b>Restricted discretionary</b></p> <p>Matters of discretion are restricted to:</p> <p>1. The matters in MCZ-P4.</p> <p>Notification:</p> <p>An application under this rule is precluded from being publicly notified in accordance with section 95A of the RMA.</p>
	<p><b>MCZ-R22 Retirement village</b></p> <p>1. Activity status: <b>Restricted discretionary</b></p> <p>Matters of discretion are restricted to:</p> <p>1. The matters in MCZ-P4.</p>
	<p><b>MCZ-R23 Parking lot</b></p> <p>1. Activity status: <b>Restricted discretionary</b></p>



	<p>Matters of discretion are restricted to:</p> <ol style="list-style-type: none"> <li>1. The matters in MCZ-P9.</li> </ol> <p><b>Notification:</b>  An application under this rule is precluded from being publicly notified in accordance with section 95A of the RMA</p>
	<p><b>MCZ-R24 Trade supplier</b></p> <ol style="list-style-type: none"> <li>1. Activity status: <b>Discretionary</b></li> </ol>
	<p><b>MCZ-R25 Drive-through services</b></p> <ol style="list-style-type: none"> <li>1. Activity status: <b>Permitted</b></li> </ol>
	<p><b>MCZ-R26 Any activity not otherwise listed as permitted, restricted discretionary, discretionary or non-complying</b></p> <ol style="list-style-type: none"> <li>1. Activity status: <b>Discretionary</b></li> </ol>
	<p><b>MCZ-R27 Industrial activity</b></p> <ol style="list-style-type: none"> <li>1. Activity status: <b>Non-complying</b></li> </ol>
	<p><b>MCZ-R28 Primary production</b></p> <ol style="list-style-type: none"> <li>1. Activity status: <b>Non-complying</b></li> </ol>
	<p><b>MCZ-R29 Rural activities other than primary production</b></p> <ol style="list-style-type: none"> <li>1. Activity status: <b>Non-complying</b></li> </ol>

Standards	
<b>MCZ-S1 Height</b>	
<ol style="list-style-type: none"> <li>1. All buildings and structures must not exceed a maximum height above ground level of 53m.</li> </ol>	<p>Matters of discretion are restricted to:</p> <ol style="list-style-type: none"> <li>1. The location, design and appearance of the building or structure;</li> <li>2. Loss of sunlight to adjacent public space;</li> <li>3. Shading to surrounding buildings;</li> <li>4. Shading and loss of privacy for any adjacent residential activity;</li> <li>5. Wind effects on the safety and amenity of the adjacent public space;</li> <li>6. The planned urban built environment; and</li> <li>7. Whether an increase in building height results from a response to natural hazard mitigation.</li> </ol>
<b>MCZ-S2 Active street frontages</b>	
<ol style="list-style-type: none"> <li>1. Along building lines identified on the planning maps all buildings must be built up to and oriented towards the identified building line and provide a veranda that:</li> </ol>	<p>Matters of discretion are restricted to:</p> <ol style="list-style-type: none"> <li>1. Whether the building promotes a positive interface with the street, community safety and visual interest;</li> <li>2. Whether the building incorporates landscaping or other means to provide</li> </ol>

<ul style="list-style-type: none"> <li>a. Extends along the entire length of the building frontage;</li> <li>b. Provides continuous shelter with any adjoining veranda; and</li> <li>c. Has a minimum setback of 500mm from any kerb face.</li> </ul> <p>2. For sites with primary street frontage controls identified in the planning maps:</p> <ul style="list-style-type: none"> <li>a. At least 55% of the ground floor building frontage must be display windows or transparent glazing; and</li> <li>b. The principal public entrance to the building must be located on the front boundary.</li> </ul> <p>3. For sites with secondary street frontage controls identified in the planning maps at least 35% of the ground floor building frontage must be display windows or transparent glazing.</p>	<p>increased amenity, shade and weather protection; and</p> <p>3. Whether topographical or other site constraints make compliance with the standard impractical.</p>
<b>MCZ-S3      Location of residential units</b>	
<p>1. All residential units must be located above ground floor.</p>	<p>Matters of discretion are restricted to:</p> <ul style="list-style-type: none"> <li>1. The amenity and quality of the streetscape;</li> <li>2. Whether the location of the residential units promote on the an active frontage, community safety and visual interest at the pedestrian level; and</li> <li>3. Whether the design could facilitate conversion to commercial use so as not to foreclose future options.</li> </ul>
<b>MCZ-S4      Location of parking</b>	
<p>1. Any on-site ground level car parking must be located within or at the rear of the building that it serves.</p>	<p>Matters of discretion are restricted to:</p> <ul style="list-style-type: none"> <li>1. The amenity and quality of the streetscape.</li> </ul>

<b>MCZ-S5      Service areas and outdoor storage</b>	
<p>1. Any on-site service area, including rubbish collection areas, and area for the outdoor storage of goods or materials must:</p> <p>a. Be located to the rear of the building; and</p> <p>b. Without preventing the provision of a gate or entry point to the site, be fully screened by a 1.8m high fence or landscaping where it is visible from the road or any other public space.</p>	<p>Matters of discretion are restricted to:</p> <p>1. The amenity and quality of the streetscape or public space; and</p> <p>2. The service and storage needs of the activity.</p>

### **Appendix 3: Maps**

The following maps set out the height amendments sought from Kāinga Ora to Plan Change 14.

Noting that changes to the Residential Suburban and Residential Transition Zone and including the Lyttleton Port Residential Zone has not been shown here.





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Christchurch City Council

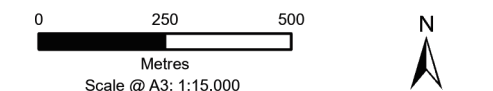
Plan Change 14

Kāinga Ora Submission

Hornby

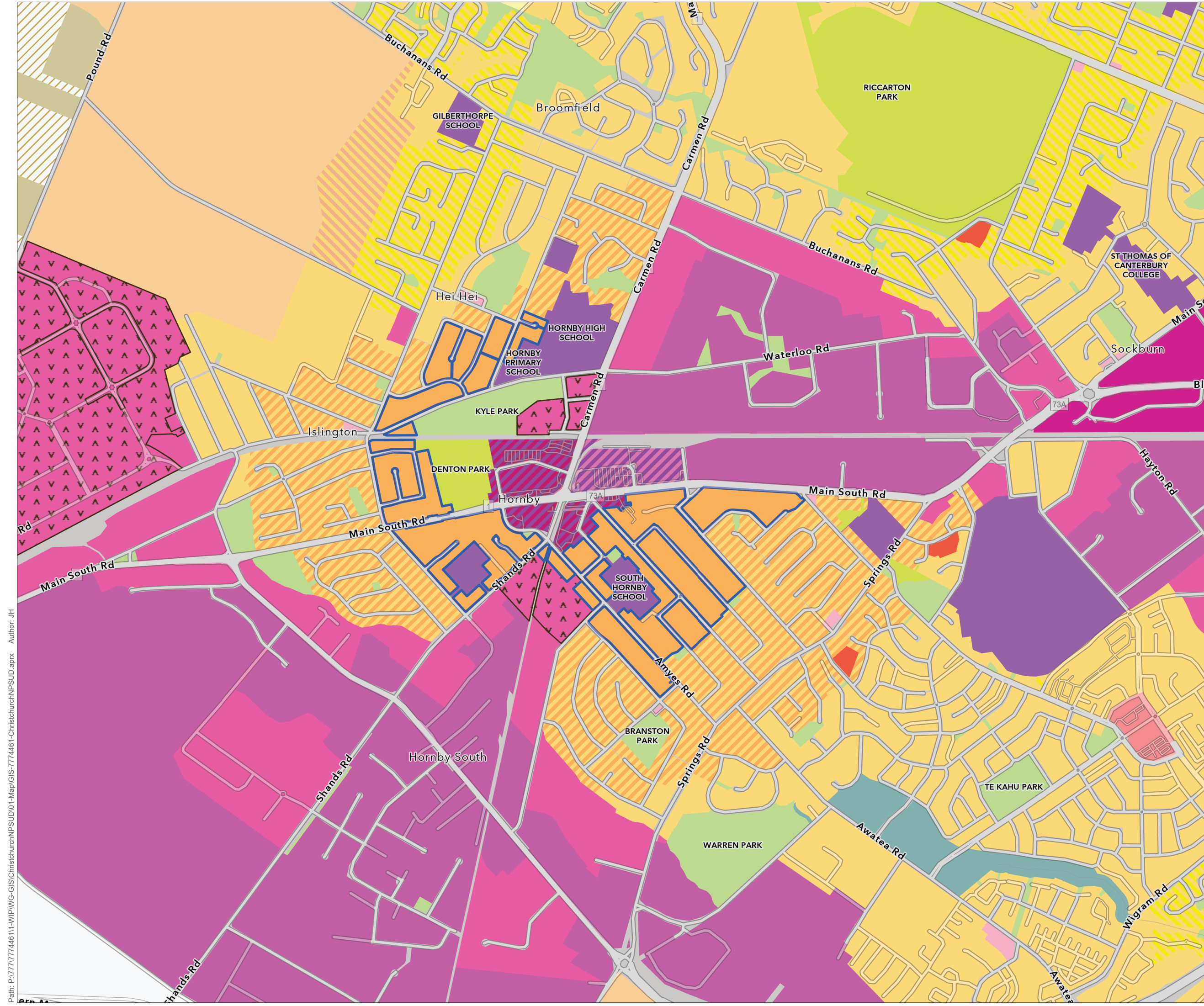
- Kāinga Ora Proposed HVC
- Height Variation Control - 36m
- Kāinga Ora Proposed Zoning
- Metropolitan Centre Zone
- High density residential zone
- Medium density residential zone
- PC14 Zoning
- Future Urban Zone
- High density residential zone
- Large format retail zone
- Local centre zone
- Medium density residential zone
- Mixed use zone
- Neighbourhood centre zone
- Town centre zone
- Transport
- Specific Purpose
- Industrial General
- Industrial Heavy
- Industrial Park
- Rural Quarry
- Rural Quarry or Open Space Community Parks (Templeton)
- Rural Urban Fringe
- Residential Guest Accommodation
- Residential Suburban
- Residential Suburban Density Transition
- Open Space Community Parks
- Open Space Metropolitan Facilities
- Open Space Water and Margins
- Residential New Neighbourhood
- Precinct
- Brownfield Precinct

This map contains data derived in part or wholly from sources other than Kāinga Ora, and therefore, no representations or warranties are made by Kāinga Ora as to the accuracy or completeness of this information. Contains information sourced from Hastings District Council, Hawkes Bay Regional Council, LINZ, Stats NZ, Esri, HERE, Garmin, Foursquare, METI/NASA, USGS. Map intended for distribution as an A3 PDF document.



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Client	Kāinga Ora
Discipline	GIS
Drawing No.	GIS-7774461-CCPC14-04



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10931

Christchurch City Council

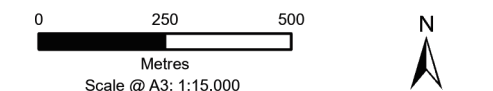
Plan Change 14

Kāinga Ora Submission

Riccarton

- Kāinga Ora Proposed HVC
- Height Variation Control - 36m
- Kāinga Ora Proposed Zoning
- Metropolitan Centre Zone
- High density residential zone
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- Central City Mixed Use Zone
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- Large format retail zone
- Local centre zone
- Medium density residential zone
- Mixed use zone
- Neighbourhood centre zone
- Town centre zone
- Transport
- Specific Purpose
- Industrial General
- Industrial Heavy
- Residential Guest Accommodation
- Residential Medium Density
- Residential Suburban
- Residential Suburban Density Transition
- Open Space Community Parks
- Open Space Metropolitan Facilities
- Open Space Natural
- Open Space Water and Margins
- Commercial Office

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12<sup>th</sup> May 2023

Attn: Mark Stevenson  
Planning Manager  
Christchurch City Council  
Po Box 73016  
Christchurch

*Submission lodged via email: [engagement@ccc.govt.nz](mailto:engagement@ccc.govt.nz)*

**KĀINGA ORA – HOMES AND COMMUNITIES SUBMISSION ON A NOTIFIED  
PROPOSAL FOR PLAN CHANGE 14 UNDER CLAUSE 6 OF SCHEDULE 1 OF THE  
RESOURCE MANAGEMENT ACT 1991**

**This is a submission on Plan Change 14 – Housing and Business Choice (“PC14”) from Christchurch City Council (“the Council” on the Operative Christchurch District Plan (“the Plan”).**

Kāinga Ora does not consider it can gain an advantage in trade competition through this submission. In any event, Kāinga Ora is directly affected by an effect of the subject matter of the submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

**The specific provisions of the proposal that this submission relates to:**

PC14 in its entirety.

**This document and the appendices attached is Kāinga Ora submission on PC14.**

**The Kāinga Ora submission is:**

1. Kāinga Ora Homes and Communities (“Kāinga Ora”) is a Crown Entity and is required to give effect to Government policies. Kāinga Ora has a statutory objective that requires it to contribute to sustainable, inclusive, and thriving communities that:
  - a) Provide people with good quality, affordable housing choices that meet diverse needs; and
  - b) Support good access to jobs, amenities and services; and
  - c) Otherwise sustain or enhance the overall economic, social, environmental and cultural well-being of current and future generations.
2. Because of these statutory objectives, Kāinga Ora has interests beyond its role as a public housing provider. This includes a role as a landowner and developer of residential housing and as an enabler of quality urban developments through increasing the availability of build-ready land across the Canterbury Region, including Christchurch City.
3. Kāinga Ora therefore has an interest in both PC13 and PC14 and how they:
  - a) Gives effect to the National Policy Statement on Urban Development (“**NPS-UD**”) and The Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (“**the Housing Supply Act**”);
  - b) Minimises barriers that constrain the ability to deliver housing development across public housing, affordable housing, affordable rental, and market housing; and
  - c) Provides for the provision of services and infrastructure and how this may impact on the existing and planned communities, including Kāinga Ora housing developments.
4. Kāinga Ora supports the general direction and intent of Plan Change 14, especially to the extent that this suite of plan changes is more enabling of residential and business development capacity compared to the Christchurch City Council Operative District Plan.

In particular, Kāinga Ora supports:

- a) The recognition of the need for well-functioning urban environments (consistent with the direction set out in the National Policy Statement on Urban Development 2020 (“**NPS-UD**”));
- b) The provision of medium density housing in most existing residential areas across the city, which is consistent with the requirements of the Resource Management (Enabling Housing Supply) Amendment Act 2021 (“**the Amendment Act**”);
- c) The recognition of the need to provide sufficient development capacity to meet long term demands for housing and business land;
- d) The need to manage significant risks from natural hazards;
- e) The promotion of a compact urban form and residential intensification in Christchurch City;
- f) The provision for enabling medium to high density residential development within a walkable catchment of the City Centre and larger Commercial Centres; and
- g) The provision of a range of commercial and mixed-use environments which will provide for and support urban development across Christchurch City.

5. The Kāinga Ora submission seeks amendments to PC14 in the following topic areas:

### ***Qualifying Matters***

- a) Kāinga Ora could support the qualifying matters, subject to amendments and clarifications as sought in the submission with the exception of: Low Public Transport Accessibility, Key Transport Corridors, Sunlight Access, Residential Heritage Areas, Character Areas, the Christchurch International Airport Noise Influence Area, Industrial Interfaces, and Open Space Areas which are opposed in full by Kāinga Ora for the reasons included in **Appendix 1**.
- b) Kāinga Ora considers that qualifying matters need to be expressed more clearly across PC13 and PC14 to assist with plan administration and interpretation. For example, having some of the Heritage Area provisions being contained in PC14 and following an IPI process i.e. the built form standards. Whilst other Heritage Area provisions are being progressed through a separate PC13, and following a first schedule process i.e. Heritage Area policies has created efficiency issues.

- c) Kāinga Ora opposes the proposed introduction of certain new qualifying matters through the IPI process because doing so in this instance (having regard to the nature of the particular qualifying matters concerned) goes beyond the scope of the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021. The concerns about the use of the IPI process for this purpose was highlighted in the recent Environment Court's decision of *Waikanae Land Company Limited v Heritage New Zealand Pouhere Tāonga [2023] NZEnvC 056*. As noted in that case, if a Council wishes to implement other changes to its district plan, then there is the usual First Schedule process that can be adopted, with that process containing the appropriate safeguard of a full appeal to the Environment Court.

### **Residential Heights**

- d) Kāinga Ora supports the application of a Medium Density Residential Zone (MRZ) across all relevant residential zones. It also supports the introduction of High Density Residential Zone (HRZ) around the edge of the City Centre and where located in close proximity to larger commercial centres. The extent of HRZ is sought to be increased in the Riccarton area given the scale of the Riccarton commercial centre and proximity to the University of Canterbury activity hub. In addition to the increased spatial extent of HRZ being sought, Kāinga Ora submits that the heights and centre hierarchy be simplified, with greater enablement of taller buildings provided.
- e) Further to this, Kāinga Ora seeks that a Height Variation Control overlay of 36m be applied 1.20km from the edge of the City Centre Zone and the three Metropolitan Centre Zones as sought below.

### **Metropolitan Centre Zoning**

- f) Kāinga Ora seeks the introduction of a new 'Metropolitan Centre Zone (MCZ) in the Plan to replace the Riccarton, Papanui, and Hornby Town Centre Zones to recognise the broader catchment these centre serve, both currently and to account for future growth of the residential catchment. The existing size, scale and function of these centres are such that they merit the application of a MCZ classification, with appropriate objectives, policies and rules framework. A MCZ chapter is sought and is attached in **Appendix 2**. Further, recent and proposed investment in public and active transport modes along the corridors in which these activity centres are located, support the case for a zoning classification reflective of their relative position within the centres hierarchy.

### ***Industrial Interface, Industrial General, and Commercial Mixed Use proposals***

- g) Kāinga Ora submits that the Industrial Interfaces qualifying matter and associated policies, and rules are deleted, and that the purported effects are managed, where necessary through noise controls and acoustic and ventilation requirements as opposed to the proposed density controls.
- h) In reviewing the locations that the Industrial Interface qualifying matter applies in the preparation of this submission, Kāinga Ora notes that the current function of many industrial general zone areas, that are located in primarily residential areas, would no longer meet a definition of 'industrial activity'. Kāinga Ora question if this zoning may no longer be appropriate for these locations and if an application of a commercial mixed use zone may be more appropriate; as has been proposed in PC14 for Sydenham.
- i) Similarly, in relation to the rules that have been proposed in commercial mixed use zone boundary changes in areas adjacent to the central city i.e. Sydenham and Phillipstown, Kāinga Ora express concern that the approach taken will not achieve the outcomes sought. Kāinga Ora proposes that the existing zoning remains and a schedule 1 process is followed, including structure planning and use of appropriate planning methods. This may also provide the Council with opportunities to support these changes through the Long Term Plan.

### ***General Feedback***

- j) Kāinga Ora submits that changes to policies, rules and matters of discretion are necessary to better reflect the requirements and intent of the 'the Housing Supply Act' and NPS-UD. Kāinga Ora considers that PC14 is not currently appropriately framed to recognise that as the character of planned urban areas evolves to deliver a more intensive and compact urban form, amenity values will change. Amendments are sought to ensure this is reflected more consistently throughout the provisions, in language that is consistent with the NPS-UD.
- k) The Kāinga Ora submission seeks changes to rules to address errors, to align with Schedule 3A of the Housing Supply Act, or to reduce duplication where the standards introduced via Schedule 3A overlap with District Plan provisions that are not proposed to be deleted.



- l) The Kāinga Ora submission seeks amendments to objectives, policies, rules and matters for discretion / assessment criteria - for improved clarity, effectiveness and focus on the specific resource management issue / effect to be addressed. Further, The scope and extent of assessment matters provide such broad discretion that they undermine the 'Housing Supply Act's' intent of a restricted discretionary activity status.
  - m) The submission seeks such further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission above and in **Appendix 1**.
6. The changes requested are made to:
- a) Ensure that Kāinga Ora can carry out its statutory obligations;
  - b) Ensures that the proposed provisions are the most appropriate way to achieve the purpose of the Resource Management Act 1991;
  - c) Reduce interpretation and processing complications for decision makers so as to provide for plan enabled development;
  - d) Provide clarity for all plan users; and
  - e) Allow Kāinga Ora to fulfil its urban development functions as required under the Kāinga Ora–Homes and Communities Act 2019.
7. The Kāinga Ora submission points and changes sought can be found within Table 1 of Appendix 1 which forms the bulk of the submission.
8. A Metropolitan Centre Zone chapter is sought and included in **Appendix 2**.
9. Mapping changes sought are included in **Appendix 3**.

**Kāinga Ora seeks the following decision from Christchurch City Council:**

That the specific amendments, additions or retentions which are sought as specifically outlined in this letter and **Appendix 1-3**, are accepted and adopted into PC14, including such further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.

**Kāinga Ora wishes to be heard in support of their submission.**

Kāinga Ora seeks to work collaboratively with the Council and wishes to discuss its

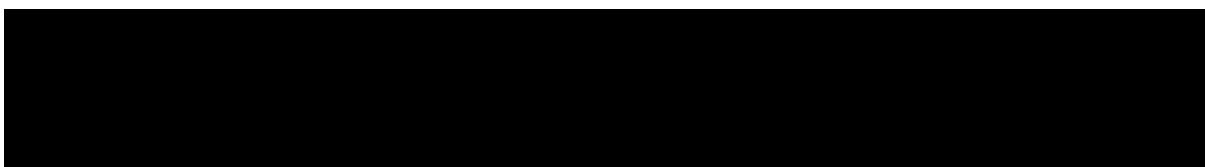
submission on PC14 to address the matters raised in its submission.

A handwritten signature in black ink, appearing to be 'BL', written over a dotted line.

**Brendon Liggett**

**Development Planning Manager**

**Kāinga Ora – Homes and Communities**



## Appendix 1: Decisions sought on PC14

The following table sets out the amendments sought to the PC14 and also identifies those provisions that Kāinga Ora supports.

*Proposed changes are shown as ~~strikethrough~~ for deletion and underlined for proposed additional text.*

Table 1

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
<b>Zone Boundaries/ Mapping</b>					
1.		Planning maps	Support in Part	<p>Kāinga Ora support the implementation of a Medium Density Residential Zone (MRZ) over all relevant residential zones. As set out in this submission, Kāinga Ora oppose the Public Transport Accessibility Qualifying Matter (QM) and the Airport Noise Influence Area QM and therefore seek as a consequence of deleting these QMs that the RS and RSDT zoned areas within these QMs be rezoned to MRZ.</p> <p>Kāinga Ora note some ambiguity in the provisions as to whether the land that is subject to the Tsunami Risk QM is intended to be zoned MRZ or RS/ RSDT. Whilst agreeing that a high risk of natural hazards is a legitimate QM, our</p>	<ol style="list-style-type: none"> <li>1. Retain MRZ over areas where MRZ is proposed in PC14 as notified unless otherwise changed by this submission.</li> <li>2. Rezone to MRZ areas that are proposed as RS/ RSDT zones under the Public Transport Accessibility and Airport Noise Influence Area QMs.</li> <li>3. Rezone Lyttelton to MRZ.</li> <li>4. Rezone Papanui, Riccarton and Hornby Key Activity Centres to Metropolitan Centre Zone (MCZ) from Town Centre Zone and Large Format Retail Zone.</li> <li>5. Rezone to HRZ areas that are proposed as MRZ within a Local Centre Intensification Precinct and remove the precinct.</li> <li>6. Retain HRZ over areas where HRZ is proposed in PC14 as notified unless otherwise changed by this submission.</li> </ol>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>submission raises concerns with whether the costs and benefits of this QM strike an appropriate balance, and question the appropriateness of using a threshold of a 1:500 year event plus a 1m rise in sea levels as the mapping base. Use of a lower density RS/ RSDT zoning should only be used where the risk of hazards is proven to be high and with a high return period.</p> <p>The areas subject to the 'Local Centre Intensification Precinct' are sought to be rezoned from MRZ to HRZ and the precinct overlay deleted. These areas are ideally located adjacent to medium-sized commercial centres that provide residential activities with easy access to a wide range of services and are also generally well serviced by public transport. As such, a HRZ is considered to be more appropriate and better aligned</p>	<p>7. Remove the Large Local Centre Intensification Precinct and replace with HDZ.</p> <p>8. Extend the boundary of HRZ in the Riccarton area as shown in the maps attached to this submission in <b>Appendix 3</b>.</p> <p>9. Delete the various height/ intensification precincts and replace with a single 'Height Variation Control' precinct to reflect the 36m height limit sought in the submission for the HRZ adjacent to the City Centre, Hornby, Riccarton, and Papanui centres as shown in the maps attached to this submission within <b>Appendix 3</b>.</p> <p>Generally these are:</p> <ul style="list-style-type: none"> <li>- 22m HDZ 1.20km from the edge of the new MCZ and the CCZ.</li> <li>- 36m Height Variation Overlay 400m from the edge of the new MCZ and CCZ.</li> </ul>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>with NPS-UD and National Planning Standard outcomes.</p> <p>Kāinga Ora submits that Metropolitan Centres be employed within the centres hierarchy. Kāinga Ora seeks that this covers the existing key activity areas for Riccarton, Papanui, and Hornby.</p> <p>Kāinga Ora support the inclusion of a HRZ in appropriate locations close to the City Centre, Metropolitan and larger suburban commercial centres. The zone boundaries for the HRZ is supported, with the only exception being in the Riccarton area where an extension of the HRZ boundaries are sought to better recognise the proximity of this area to a wide range of commercial services, university activity node, high frequency public transport, cycle ways, and the relief sought in the submission opposing the</p>	



ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>Riccarton Bush, Industrial Interface, Airport Influence Density Precinct, and Piko/Shands heritage area and character area QMs. Noting also the recommendation that Kāinga Ora has suggested in relation to amendments to the Industrial General Zoning at 247 Riccarton Road and 37 Euston Street.</p> <p>Kāinga Ora seeks to rationalise and simplify the height limits applicable to the HRZ, depending on the size of the adjacent commercial centre. Consequential amendments are therefore required to the various height/ intensification precincts to reflect the outcomes sought in the submission.</p>	
<b>Chapter 3 - Strategic Directions</b>					

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
2.	3.3	Objective 3.3.3 – Ngāi Tahu mana whenua	Support in Part	<p>The proposed amendment to clause (a)(ii) is supported.</p> <p>This objective is sought to also include explicit reference to enabling the ability of mana whenua to establish Papakāinga/Kāinga Nohoanga as an important tool in meeting their well-being and prosperity as sought in the amendment.</p>	<p>1. Amend clause (a)(ii) as follows:</p> <p>Ngāi Tahu mana whenua's <del>aspirations to actively participate</del> <b><u>priorities for their well-being and prosperity are recognised and provided for</u></b> in the revitalisation of Ōtautahi, <b><u>including the provision of Papakāinga/Kāinga Nohoanga are recognised</u></b>; and</p>
3.	3.3	Objective 3.3.4 – Housing bottom lines and choice	Support	Support the proposed reference to Papakāinga/Kāinga Nohoanga as a new clause (b)(ii).	Retain clause (b)(ii) as notified.
4.	3.3	Objective 3.3.7 – Well functioning urban environment	Support in Part	<p>Clause (a) implements legislative requirements and is supported. The balance of the objective is likewise supported, with the exception of clause (a)(i)(A) which confuses urban form with landscape outcomes and adds little meaningful value to the objective.</p> <p>Clause (a)(E)(iii) relating to mana whenua must include</p>	<p>2. Retain the objective as notified, except for:</p> <p>Delete clause (a)(i)(A)  <del>Contrasting building clusters within the cityscape and the wider perspective of the Te Poho-o-Tamatea/the Port Hills and Canterbury plains; and</del></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>explicit reference to Papakāinga/Kāinga Nohoanga.</p> <p>It is noted that the clause numbering/ formatting is unclear.</p>	<p>Amend clause (a)(E)(iii) as follows:</p> <ol style="list-style-type: none"> <li>1. The cultural traditions and norms of Ngāi Tahu mana whenua, <u>including the provision of Papakāinga/Kāinga Nohoanga</u></li> <li>2. Update clause numbering.</li> </ol>
5.	3.3	Objective 3.3.8 – Urban growth, form and design	Support in Part	<p>In line with our submission raising concerns that the proposed character area QM does not meet s32 requirements, in the event that the character area provisions are deleted, then existing clause (a)(ii) is also sought to be deleted.</p> <p>Similarly in line with our submission raising consistency of heights in local centres, and in line with concerns of the public transport access qualifying matter clause (a)(iv.)(A) is sought to be amended. The other amendments sought in PC14 to this objective are supported.</p>	<ol style="list-style-type: none"> <li>1. Retain objective as notified, except for the deletion of existing clause (a)(ii):  <del>Has its areas of special character and amenity value identified and their specifically recognised values appropriately managed; and</del></li> <li>2. Amend clause (a)(iv.)(A) as follows:  <u>in and around the Central City, Key Activity Centres (as identified in the</u>  <u>Canterbury Regional Policy Statement), Town Centre, and larger Local neighbourhood</u></li> </ol>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<u>centres, and nodes of core public transport routes; and</u>
6.	3.3	Objective 3.3.10 – Natural and cultural environment	Oppose	In line with our submission seeking the deletion of the tree canopy financial contribution rules, the related proposed reference to tree canopy in the strategic objectives is also opposed.	Delete proposed clause (a)(ii)(E):  <del>Tree canopy cover in areas of residential activity that maintains and enhances the city's biodiversity and amenity, sequesters carbon, reduces stormwater runoff, and mitigates heat island effects; and</del>
7.	3.3	Objective 3.3.13 - Infrastructure	Oppose	In line with our submission seeking the deletion of the Airport Influence Density Precinct and our concern that the Qualifying Matter does not meet s32 requirements, amend Clause (b.)(iii.)	Delete clause (b.)(iii.).
<b>Chapter 6 – Qualifying Matters</b>					
8.	Sites of Ecological Significance	6.1A Qualifying matters  Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards	Support	Kāinga Ora support the Sites of Ecological Significance, the Outstanding and Significant Natural Features, and the Sites of Cultural Significance qualifying matters, noting these	1. Retain the Sites of Ecological Significance qualifying matter.  2. Retain the Outstanding and Significant Natural Features qualifying matter.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
	<ul style="list-style-type: none"> <li>Outstanding Natural Features and Landscapes</li> <li>Sites of Cultural Significance (Wāhi Tapu / Wāhi Taonga, Ngā Tūranga Tūpuna, Ngā Wai and Belfast Silent File)</li> </ul>	<p>and/or intensification enabled under Policy 3.</p> <p>9.1.4.1.1 P1 Indigenous vegetation clearance.</p> <p>9.1.4.1.3 RD3 – RD6 Indigenous vegetation clearance.</p> <p>9.1.4.1.5 NC1 and NC3 Indigenous vegetation clearance.</p> <p>8.5.1.3 RD11 Subdivision of land.</p> <p>8.9.2.3 RD5 Earthworks.</p> <p>9.2.4.1 Table 1(a) – (d), (i), (o) – (s) Outstanding natural features and landscapes.</p> <p>9.5.4.1.3 RD3 – RD6 Wāhi Tapu / Wāhi Taonga.</p>		<p>are all relevant matters of national significance in Section 6.</p> <p>It is also noted that there is very little overlap between Sites of Ecological Significance and Outstanding Natural Features and Landscapes with existing residential zones.</p>	<p>3. Retain the Sites of Cultural Significance qualifying matter.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		8.5.1.3 RD11 Subdivision of land.  8.9.2.3 RD5 Earthworks.			
9.	Slope Hazard Areas	6.1A Qualifying matters  Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.  5.6.1 Slope Instability Management Area	Support	Kāinga Ora support the management of significant risks from natural hazards as a qualifying matter (in appropriate circumstances), noting that it is a matter of national significance in Section 6.  As slope hazards are less dynamic and have greater certainty as to their risk over time than flooding (submitted on below) and are not subject to constant change through hazard mitigation works, Kāinga Ora supports the Slope Hazard Areas qualifying matter.	Retain the Slope Hazard Areas qualifying matter.
10.	High Flood Hazard Management Area	6.1A Qualifying matters  Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards	Support in Part	Kāinga Ora supports a risk-based approach to the management of natural hazards, however, opposes the inclusion of further hazard	1. Amend the provisions to remove / delete the mapped Hazard Management Areas from within the District Plan and instead hold this information in non-statutory GIS maps.



ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
	<p>Coastal Hazard Management Areas</p> <p>Tsunami Management Area</p>	<p>and/or intensification enabled under Policy 3.</p> <p>5.4.5 Flood Ponding Management Areas</p> <p>5.4.6 High Flood Hazard Management Areas</p> <p>5.2.2.5.1 Managing development in Qualifying Matter Coastal Hazard Management Areas 5.4A.1 – 5.4A.6 Rules – Qualifying Matter Coastal Hazard Management Areas and Qualifying Matter Tsunami Management Area.</p> <p>5.2.2.5.2 Managing development within the Qualifying Matter Tsunami Management Area</p> <p>5.4A.1 – 5.4A.6 Rules – Qualifying Matter Coastal Hazard Management Areas</p>		<p>areas within the maps as part of the District Plan.</p> <p>Including Flood Hazard Areas in the District Plan ignores the dynamic nature of such hazards. Kāinga Ora accepts that it is appropriate to include rules in relation to these hazards but seeks that the rules are not linked to static maps.</p> <p>Other councils across the country adopt a set of non-statutory hazard overlay maps which operate as interactive maps on the respective Council's 'Geo Maps' website – a separate mapping viewer to the statutory maps. The advantage of this approach is the ability to operate a separate set of interactive maps which are continually subject to improvement and updates, outside of and without a reliance on the Schedule 1 process under the RMA. Kāinga Ora notes that there is no formal requirement for hazard</p>	<p>2. Reduce the Tsunami Management Area to a 1:100 year hazard.</p> <p>3. Amend and make consequential changes to give effect to this submission.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		and Qualifying Matter Tsunami Management Area		<p>maps to be included within a district plan.</p> <p>Kāinga Ora also has concerns that the proposed policy approach relating to the Tsunami Management Area is too conservative, noting that Policy 24 of the NZCPS requires identification of areas in the coastal environment that are potentially affected by coastal hazards (including tsunami) over at least 100 years.</p> <p>Kāinga Ora also considers that the Council's intent to retain Residential Suburban / Residential Suburban Density Transition zoning in the Tsunami Management Area is disproportionate based on the modelled return period.</p>	
11.	Historic Heritage, Residential Heritage Areas, and Residential	6.1A Qualifying matters  Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium	Support Historic Heritage.	Kāinga Ora generally supports the protection of areas of historic heritage where the requirements of Section 6 of the Resource Management Act	Delete the Residential Heritage Area qualifying matter and all proposed provisions.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
	Heritage Area Interface.	<p>Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>14.5.3.2.3 Building height - Residential Heritage Areas.</p> <p>14.5.3.2.7 Number of Residential Units Per Site - Residential Heritage Areas.</p> <p>14.5.3.2.8b, 8c Setbacks - Residential Heritage Areas.</p> <p>14.5.3.2.9 Building Coverage - Residential Heritage Areas.</p> <p>14.5.3.2.10c Outdoor living space - Residential Heritage Areas.</p>	Oppose Residential Heritage Areas.	<p>1991 ('RMA' or 'the Act') are met. However, Kāinga Ora opposes the new proposed Heritage Areas ('HAs') that are sought to be introduced under PC13 and PC14 in their entirety.</p> <p>Kāinga Ora does not consider that the proposed HAs meet the requirements of Section 6 of RMA to the extent that they should be accorded 'historic heritage' status of 'national' significance.</p> <p>Therefore, if these areas are considered to manage character (s7 RMA), rather than protect heritage, Kāinga Ora considers that a more nuanced assessment of costs and benefits applies to areas with a high proportion of Kāinga Ora housing, such as the proposed Piko/Shands character and heritage areas (i.e. the benefits of providing a greater number of houses for the most vulnerable members of society,</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>particularly in an area that has historically been used for social housing, are greater than retaining the character associated with existing housing per se, and therefore the character or heritage values of such locations must be carefully weighed to test the heritage values are existent and sufficiently so that they outweigh the social costs of lost development opportunity. We do not believe this test has been met.</p> <p>A more nuanced assessment of costs and benefits is likewise required for heritage areas in locations that are otherwise ideally located for further intensification, such as the heritage areas within and adjacent to the central city/ Four Avenues. Piko/ Shands is located in close proximity to both Riccarton and Church Corner commercial centres as well as an emerging high frequency public transport</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>corridor along Riccarton Road and a new major cycle way network. Were it not for the heritage and character area overlays, the Piko/ Shands area would merit a High Density zoning/ height limits.</p> <p>The imposition (costs) of character controls in locations that would otherwise suit high density housing must therefore be greater than the costs applying to character areas more generally. It follows that the benefits of such regulation and the identification of these areas as Qualifying Matters must therefore be greater than the benefits generally in order to justify additional regulation.</p> <p>It is further noted that having some of the Heritage Area provisions being contained in PC14 and following an IPI process i.e. the built form standards, and other Heritage Area provisions being progressed through a separate</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>PC13, and following a first schedule process i.e. Heritage Area policies has created efficiency issues.</p> <p>Consistency is sought with the Kāinga Ora submission on Plan Change 13 ("PC13"), which Kāinga Ora opposed the approach of establishing 'Historic Heritage Areas' in its entirety.</p> <p>Kāinga Ora is seeking the spatial application of residential zones to be applied across the City, regardless of the nature and extent of the current and proposed 'Heritage Areas' set out by Council in PC13. Kāinga Ora seeks the deletion of any proposed changes in PC14 that seek amendments to historic heritage and special character, consistent with the relief sought in PC13.</p> <p>Kāinga Ora considers that the proposed changes across PC13 and PC14 are not</p>	



ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				qualifying matters, as the assessments in its view, do not meet the requirements under s6, s77I, s77J, s77K, and/or s77L of the RMA.	
12.	Significant and Other Trees (excluding those not identified as Qualifying Matters).	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>9.4.4.1.1 P1 – P12 Tree pruning, felling, earthworks.</p> <p>9.4.4.1.2 C1 Tree maintenance.</p> <p>9.4.4.1.3 RD1 – RD8 Tree pruning, felling, earthworks.</p> <p>9.4.4.1.4 D1 – D2 Tree pruning, felling 9.4.7.1 Appendix – Schedules of significant trees.</p>	Support in Part	<p>Kāinga Ora support the Significant and Other Trees qualifying matter.</p> <p>The rules in Chapter 9 of the District Plan sufficiently recognise and provide for the management of notable trees. Such rules provide a suitable framework for considering new buildings in proximity to notable trees, or their removal.</p> <p>Rule 9.4.4.1.1 P12 triggers the need for resource consent for earthworks within 5m of a street tree, however consent is always granted provided the works are undertaken by, or under the supervision of, a works arborist. The relief sought would reduce costs and the reliance on the resource consent process and is therefore more consistent</p>	<ol style="list-style-type: none"> <li>1. Retain Significant and Other Tree Qualifying Matter.</li> <li>2. Amend Rule 9.4.4.1.1 P12 as follows:</li> </ol> <p>Rule 9.4.4.1.1 P12 - Activities shall be undertaken by, or under the supervision of, a works arborist. <del>employed or contracted by the Council or a network utility operator.</del></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				with Objective 3.3.2.	
13.	Waterbody setbacks	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>6.6.4 City and Settlement Water Body Setbacks 6.6.4.1 – 6.6.4.4 Activities within water body setbacks</p>	Support in Part	<p>Section 6 seeks the preservation of rivers and their margins and their protection from inappropriate subdivision, use and development. Similarly, Section 6 also recognises and provides for the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, wāhi tapu, and other taonga.</p> <p>Kāinga Ora is supportive of these Section 6 matters being identified as a qualifying matter. However, where the identified waterbodies do not meet a Section 6 threshold, such as for 'Environmental Asset Waterways' and 'Network Waterways' use of waterway setbacks as a qualifying matter, Council needs to demonstrate why development that is otherwise permitted under</p>	Remove 'Environmental Asset Waterways' and 'Network Waterways' as qualifying matter, unless a site by site assessment has been undertaken that demonstrates why development that is otherwise permitted under MDRS is inappropriate.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>MDRS is inappropriate, for every specific waterway (and adjacent site) where a qualifying matter is proposed.</p> <p>The existing provisions in Chapter 6.6 of the District Plan are sufficient.</p>	
14.	Public Open Space areas; and  Ōtākaro Avon River Corridor.	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>18.4 to 18.96.1A Qualifying matters</p> <p>13.14 Specific Purpose (Ōtākaro Avon River Corridor) Zone – All provisions, including Appendix 13.14.6.2 specifying alternative zone provisions applicable to privately owned properties within the zone</p>	Oppose	<p>Kāinga Ora considers this qualifying matter is unnecessary and seek that it is deleted.</p> <p>While the use of areas for open space purposes is identified as a qualifying matter under RMA s77O(f), the areas zoned Open Space are owned by CCC and many are administered under the Reserves Act 1977. Council ownership, and Open Space zoning, makes it unlikely that these areas will be developed for medium density housing and such development would also be contrary to the purposes for which these sites were reserved. Further, the Housing Supply Act only requires CCC</p>	Delete the Open Space (recreation zone) qualifying matter and any relevant provisions proposed in its entirety.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		15.4.3.2.1 Maximum building height;  Appendix 15.15.1 Town Centre Zone (Belfast/Northwood) Outline Development Plan		to incorporate MDRS into every relevant residential zone (not Open Space Zone).  The s77O(f) matter is noted as being relevant for other councils where their District Plan does not include an Open Space zone and instead reserves often have a residential zoning.  As with the Open Space Zones, Kāinga Ora note that the Ōtākaro 'red zone' area has been subject to detailed place-based assessment, with large-scale residential development not anticipated in this area.	
15.	Residential Character Areas	6.1A Qualifying matters  Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.  14.5.3.1.1 P4 Conversion to two residential units –	Oppose in Part	Kāinga Ora support, in principle, the management of character as a qualifying matter. However, Kāinga Ora does not consider appropriate justification has been provided for the proposed new or extended 'character areas' set out in PC13 and PC14 to demonstrate that they contain specific characteristics that	<ol style="list-style-type: none"> <li>1. Delete all new or extended character areas as qualifying matters and undertake further analysis to determine the exact values of the resources that the Council seeks to manage in the District Plan.</li> <li>2. For existing character areas retain the controlled activity status for new buildings that exists in the Operative Plan - Rule 14.5.3.1.2 C1.</li> </ol>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		<p>Character Area Overlays</p> <p>14.5.3.1.2 C1 Character Area Overlays – new residential units to rear</p> <p>14.5.3.1.3, RD6, RD14 Area-specific rules and character overlays.</p> <p>14.5.3.2.3 Building height – Character Area Overlays.</p> <p>14.5.3.2.5 – 14.5.3.2.14 Built form rules – Character Area Overlays.</p> <p>14.15.27 Matters of discretion - Character Area Overlays.</p> <p>14.8.1.1 P18 – Conversion to two residential units –Lyttelton Character Area.</p> <p>14.8.3.1.1 P5 – Minor residential unit in Lyttelton Character Area or Lyttelton Residential Heritage Area.</p>		<p>make the level of development provided by the MDRS or policy 3 inappropriate in the area. Further, they blur the line between the protection of historic heritage values as set out under s6(f) of the RMA, and amenity values as set out under section 7 of the RMA. This is especially the case where both character and heritage area overlays apply to the same geographic area.</p> <p>Kāinga Ora questions the planning method and assessment undertaken to determine the proposed provisions.</p> <p>Kāinga Ora considers that any such provisions and values identified should be ‘managed’ rather than ‘protected’ in the District Plan. Kāinga Ora seeks the provisions as proposed are deleted and that further analysis is undertaken to determine the exact values of the resources that the Council</p>	<p>14.5.3.2.3 Building height – Character Area Overlays, and</p> <p>14.5.3.2.5 – 14.5.3.2.14 Built form rules – Character Area Overlays.</p> <p>3. In the event that the Character Area qualifying matter remains, explicit provision is sought for the ability to develop Papakāinga/Kāinga Nohoanga, noting that local Rūnanga have purchased the former Lyttelton West School Site.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		<p>14.8.3.1.2 C3 – New residential unit to rear Lyttelton Character Area.</p> <p>14.8.3.1.3 RD3 – Lyttelton Character Overlay – new buildings, alterations etc.</p> <p>14.8.3.1.3. RD5-RD7, RD9 – not meeting Lyttelton Character Area or Residential Heritage Area built form rules</p> <p>14.8.3.1.3 RD8, RD10 –not meeting Lyttelton Character Area built form rules.</p> <p>14.8.3.1.3 RD11 - Lyttelton Character Area or Lyttelton Residential Heritage Area – not meeting minor residential units rules.</p> <p>14.8.3.2.2 –14.8.3.2.6 Built form rules – Lyttelton Character Area or Lyttelton Residential Heritage Area.</p> <p>14.8.3.2.7 – 14.8.3.2.12 -Built form rules – Lyttelton Character Area only.</p>		seeks to manage in the District Plan.	



ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
16.	Electricity Transmission Corridors.	<p>6.1A Qualifying matters.</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>14.4.1.5 NC6 – NC7 National Grid transmission and distribution lines.</p> <p>14.5.1.5 NC2 – NC3 National Grid transmission and distribution lines.</p> <p>14.7.1.5 NC2 National Grid transmission and distribution lines.</p> <p>14.12.1.5 NC1 – NC2 National Grid transmission and distribution lines.</p>	Support	Kāinga Ora support this qualifying matter noting that the qualifying matter only relates to the National Grid Transmission Lines (nationally significant infrastructure) in accordance with s771(e) and no other lesser category of line.	Retain Electricity Transmission Corridors qualifying matter only to the extent of the corridor as defined in the NES ET.
17.	Airport Noise Influence Area	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the</p>	Oppose in Part	Kāinga Ora seeks that the Airport Noise Influence Area qualifying matter be deleted thus allowing all existing	Delete this qualifying matter and all proposed provisions.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		<p>level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>Safe or efficient operation of nationally significant infrastructure (Christchurch Airport)</p> <p>14.4.1 – 14.4.4, 14.13, 14.14 Low Density Residential Airport Influence Zone and Airport Influence Density Precinct.</p>		<p>residential zoned land within the Airport Noise Influence Area to be zoned Medium Density Residential as per the direction in the Act.</p> <p>While Kāinga Ora agrees that it is appropriate to protect strategic infrastructure (including Christchurch International Airport) from reverse sensitivity effects, it does not consider that restricting density under the Airport Noise Influence Area is necessary to avoid reverse sensitivity effects. Further, Kāinga Ora considers that the health, safety and amenity of existing and future residents living within the Airport Noise Influence Area would be appropriately maintained if the land was zoned Medium Density Residential. Any new buildings and additions to existing buildings located within the 55 dB Ldn air noise contour or the 55 dB Ldn engine testing contour would continue to be</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				subject to the acoustic insulation standards set out at Rule 6.1.7.2.2 (Activities near Christchurch Airport) in the District Plan as required by Policy 6.1.2.1.5 b. ii. (Airport noise).	
18.	Lyttelton Port Influence Overlay	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>14.8.3.1.1 – 14.8.3.1.5 Area-specific rules - Lyttelton Port Influences Overlay</p>	Support	<p>Kāinga Ora support the Lyttelton Port Influence Overlay qualifying matter noting that the qualifying matter only relates to nationally significant infrastructure in accordance with s771(e).</p> <p>Kāinga Ora does not oppose the noise insulation standards.</p> <p>Kāinga Ora notes that the geographic area covered by the Port Influence Overlay is small and overlaps with a proposed Heritage Area. Furthermore, the Port is obliged to pay for the acoustic insulation of existing dwellings within the contour (Rule 13.8.4.2.7), so the scale, plus the costs and benefits, are markedly different between the</p>	Retain Lyttelton Port qualifying matter.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				Port Influence Overlay and the Airport Noise Influence Area qualifying matter.	
19.	NZ Rail Network Interface Sites.	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>6.1.7 Activities near infrastructure.</p> <p>14.4.1.3 RD28 and 14.4.2.7 Setback from rail corridor.</p> <p>14.5.1.3 RD12 and 14.5.2.7 Setback from rail corridor.</p> <p>14.8.1.3 RD16 and 14.8.2.4 Setback from rail corridor.</p>	Oppose	Kāinga Ora considers that the standard internal boundary setback for zones is appropriate.	Delete NZ Rail Network Interface Sites qualifying matter.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		14.12.1.3 RD13 and 14.12.2.5 Setback from rail corridor.			
20.	Radio Communication Pathways for the Justice and Emergency Services Precinct.	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>6.12 Radio communication Pathway Protection Corridors.</p>	Neutral	Kāinga Ora recognise the need to maintain radio communication for emergency services, and does not provide any further feedback.	Note: Table 1 in Chapter 6.1A references an abbreviation rather than the qualifying matter rule reference.
21.	Vacuum Sewer Wastewater Constraint Areas	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>8.9A Waste water constraint areas</p>	Support in Part	<p>Kāinga Ora recognise the need to ensure sufficient infrastructure is available to service developments.</p> <p>The Restricted Discretionary Activity status and the relevant matters of discretion are generally considered appropriate, however an additional matter of discretion that provides a consenting pathway for intensification in</p>	<p>Amend as follows:</p> <p>The Council's discretion shall be limited to the following matters:</p> <p><b><u>c. The ability to connect into any nearby non-vacuum wastewater system.</u></b></p> <p><b><u>d. The extent to which alternative waste water solutions are available that do not adversely affect the</u></b></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				these areas where infrastructure constraints can be addressed by alternative means is required.	<u>function of the Council's waste water systems.</u>
22.	Sunlight Access	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>14.5.2.6 – Height in relation to boundary,</p> <p>14.6.2.2 – Height in relation to Boundary, 14.15.2 – Diagram D.</p>	Oppose	Kāinga Ora oppose 'Sunlight Access' being a qualifying matter and considers this to be inconsistent with the requirements of Section 77L.	Delete the Sunlight Access qualifying matter and all associated provisions.
23.	Low Public Transport Accessibility.	<p>14.1 Introduction,</p> <p>14.2 Objectives and Policies, 14.3 How to interpret and apply the rules, 14.4 Rules - Residential Suburban Zone and Residential Suburban Density Transition Zone, 14.7</p>	Oppose	Kāinga Ora opposes the 'Low Public Transport Accessibility' being a qualifying matter and considers this to be inconsistent with the requirements of Section 77L.	<ol style="list-style-type: none"> <li>1. Delete the Low Public Transport Accessibility Qualifying Matter and all associated provisions.</li> <li>2. Rezone all areas subject to this QM to MRZ.</li> </ol>



ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		Rules - Residential Hills Zone, 14.8 Rules - Residential Banks Peninsula Zone, 14.15 Rules - Matters of control and discretion, 14.16 Rules - Appendices – all as they apply to areas that are zoned Residential Suburban or Residential Hills, or in Lyttelton zoned Residential Banks Peninsula.		Kāinga Ora is particularly concerned to note the large areas with inadequate services in the eastern parts of the District, where the lack of such services has the potential to exacerbate existing social inequalities.	
24.	Industrial Interface	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>8.6.15 North Halswell – additional standards 8.7.13 North Halswell – additional matters – Medium and High Density Residential Zones in North Halswell 8.8.17 North Halswell – additional matters of discretion.</p>	Oppose	<p>Kāinga Ora considers that effects from industrial activities should first be mitigated at the source.</p> <p>The interfaces are already existing, with the Operative Plan having long zoned industrial areas adjacent to residential zones for light industrial activities. Invariably industry is required to meet residential zone standards relating to matters such as noise or glare at the zone boundary.</p>	Delete the Industrial Interface Qualifying Matter and all associated provisions.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				Given the existing requirements to comply with residential standards at the zone interface, combined with the General Industrial zone standards that limit heavy industry in these buffer locations, the QM setback is not considered to be appropriate with the benefits of the QM not outweighing the costs.	
25.	Riccarton Bush Interface	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>14.5.2.3 Medium Density Residential Zone – Building height.</p> <p>14.4.2.3 Residential Suburban Zone – Building height.</p>	Oppose	<p>Kāinga Ora considers that the existing long-established Operative Plan rules requiring a 10m building and earthworks setback from boundaries with the Bush are appropriate for managing potential interface issues/ impacts on tree health. The retention of the existing setback is quite different from the proposed QM which extends across roads and goes some distance from the Bush itself.</p> <p>The area around Riccarton Bush is ideally located for supporting a High Density</p>	<ol style="list-style-type: none"> <li>1. Delete the Riccarton Bush Interface Qualifying Matter and all associated provisions.</li> <li>2. The existing tree setbacks in Chapter 9.4 are retained.</li> </ol>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				Residential Zone given its close proximity to a Metropolitan centre, cycleways, high frequency bus routes, and the large university activity hub.	
26.	Key Transport Corridors – City Spine	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>14.5.2.18 – Spine Road setbacks.</p> <p>14.6.2.17 - Spine road setbacks.</p> <p>15.4.2.10 – spine corridor setbacks.</p> <p>15.5.2.10 Setback from corridor.</p>	Oppose	<p>Kāinga Ora oppose the ‘City Spine’ being a qualifying matter and considers this to be inconsistent with the requirements of Section 77L.</p> <p>The associated rules require buildings and outdoor living spaces to be set back from spine road corridors in both residential and commercial zones. In commercial zones there is a direct conflict in urban design outcomes (and rules) where the Key Pedestrian Frontage rules require buildings to be built up to the road boundary in order to deliver good urban design outcomes and facilitates a continuous street edge (often with veranda cover for pedestrians).</p>	Delete the Key Transport Corridors – City Spine Qualifying Matter and all associated provisions.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		<p>15.6.2.11 Setback from corridor.</p> <p>15.8.2.13 Setback from corridor.</p> <p>15.10.2.10 Setback from corridor.</p> <p>15.12.2.13 Setback from corridor.</p> <p>15.14.5.3 Matters of Discretion.</p>		<p>It is understood that the intention of the rule is to enable road widening in the future to accommodate public rapid transit. If Council's intention is to acquire land in the future to facilitate public works then it should use the designation powers available to it.</p> <p>Given the highly developed nature of these existing corridors with lengthy sections of commercial property built to the road boundary, it is unclear how any corridor-long road widening will occur without major land acquisition and demolition.</p>	
27.	Sites of historic heritage items and their settings (City Centre Zone) - Cathedral Square, New Regent Street, the Arts Centre.	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p>	Support	Kāinga Ora support the management of Historic Heritage as a qualifying matter, noting that Cathedral Square, New Regent Street and the Arts Centre contain individually listed heritage items and are within identified heritage settings. This is a matter of	Retain sites of historic heritage items and their settings (City Centre Zone) - Cathedral Square, New Regent Street, the Arts Centre.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		15.11.1.2 C2 Works at 100 Cathedral Square 15.11.1.3 RD9 Works at 100 Cathedral Square 15.11.1.3 RD11 buildings on New Regent Street, the Arts Centre, and in the Central City Heritage Qualifying Matter and Precinct 15.11.2.11 Building height in area-specific precincts		national significance in Section 6.	
28.	Belfast/Northwood Outline Development Plan Features	15.4.3.2.1 Maximum building height;  Appendix 15.15.1 Town Centre Zone (Belfast/Northwood) Outline Development Plan.	Neutral	Kāinga Ora does not have a view on this site-specific qualifying matter.	
<b>Chapter 5 – Natural Hazards</b>					
29.	5.5	Policy 5.2.2.5.1 – Managing development in Qualifying Matter Coastal Hazard Management Areas	Support in Part	Kāinga Ora support the management of significant risks from natural hazards as a qualifying matter (in appropriate circumstances), noting that it is a matter of national significance in Section 6.	Amend the policy as follows:  Within the following Qualifying Matters, development, subdivision and land use that would provide for intensification of any site shall be avoided, unless the risk is from coastal inundation and a site specific assessment demonstrates the

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>Kāinga Ora generally supports the risk based approach to the management of natural hazards but considers that the avoidance of intensification should be reserved to high risk from coastal inundation.</p> <p>Rule 5.4A.4 D1 requires resource consent for new buildings, other than accessory buildings, extensions etc, in areas shown on the planning maps as Qualifying Matter Coastal Hazard Medium Risk Management Area as a Discretionary Activity. Even with a site specific assessment however, Policy 5.2.2.5.1 seeks to avoid this.</p>	<p>risk is <u>medium</u>, low or very low based on thresholds defined in Table 5.2.2.5.1a below:</p>



ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
30.	5.5	Policy 5.2.2.5.2 - Managing development within Qualifying Matter Tsunami Management Area	Support in Part	<p>Kāinga Ora considers that the Council's intent to retain Residential Suburban / Residential Suburban Density Transition zoning in the Tsunami Management Area is disproportionate based on the modelled return period. This may be appropriate for 1:100 or 1:200, especially if such areas are also covered by high flood and/or coastal inundation risk overlays.</p> <p>Kāinga Ora seeks changes to the wording of Policy 5.2.2.5.2 to provide certainty of the outcomes intended, noting that the rule allows for up to four residential units to be constructed on these sites (Rule 14.4.1.1 P4, P5 and P6) so there is a disconnect between the use of the term 'avoid' and what the provisions would allow for as a permitted activity.</p>	<ol style="list-style-type: none"> <li>Amend Policy 5.2.2.5.2 as follows:  Within the Tsunami Management Area Qualifying Matter, <b>avoid discourage</b> development, subdivision and land use that would provide for intensification of any site, unless the risk to life and property is acceptable.</li> <li>Alternatively the Policy framework could be retained if the geographic extent of the QM matter is better aligned with a 1:100 return period or covers an area reflective of the Tsunami Inundation area identified by the Greater Christchurch Partnership as part of its consultation on the Greater Christchurch Spatial Plan.</li> </ol>
31.	5.4	Flood hazard provisions	Support in Part	Kāinga Ora seek that spatial identification of flood hazard	<ol style="list-style-type: none"> <li>Amend the provisions to remove / delete the mapped Hazard</li> </ol>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				management areas are made available through a set of non-statutory maps, which would operate as interactive maps on the Council's GIS website – thereby operating as a separate mapping viewer to the statutory District Plan maps. This approach is different to that of the traditional means of displaying hazard overlays on district plan maps and reflects that these maps do not have regulatory effect. The advantage of this approach is the ability to operate a separate set of interactive maps which are continually subject to improvement and updates, outside of and without a reliance on the Schedule 1 Resource Management Act 1991 process. Kāinga Ora notes that this is an approach taken by other Councils around the country.	<p>Management Areas from within the District Plan and instead hold this information in non-statutory GIS maps.</p> <ol style="list-style-type: none"> <li>2. Delete all references to maps within the District Plan.</li> <li>3. Undertake any consequential amendments to zones, overlays, precincts, and qualifying matters to reflect the relief sought in the submission.</li> </ol>
32.	5.4.1.3	Exemptions for daylight recession planes in the Flood Management Area	Support in Part	Kāinga Ora seeks for the applicable daylight recession planes in all residential zones to	Amend rules as follows:

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				be determined as if the ground level at the relevant boundary was the minimum floor level set in the activity specific standards in Rule 5.4.1.1, or natural ground level, whichever is higher.	<p>5.4.1.3 a. For P1 and P2 in Rule 5.4.1.1, the applicable daylight recession plane in residential zones <del>(other than in the Medium Density Residential Zone and High Density Residential Zone)</del> shall be determined as if the ground level at the relevant boundary was the minimum floor level set in the activity specific standards in Rule 5.4.1.1, or natural ground level, whichever is higher.</p> <p>5.4.1.3b. For P3 and P4 in Rule 5.4.1.1, the applicable daylight recession plane in residential zones <del>(other than in the Medium Density Residential Zone and High Density Residential Zone)</del> shall be determined as if the ground level at the relevant boundary was the minimum floor level specified in the Minimum Floor Level Certificate issued under Rule 5.4.1.2, or natural ground level, whichever is higher.</p> <p>5.4.1.3 c</p> <p><b>viii. Rule 14.5.2.6 Height in relation to boundary – Medium Density Residential Zone</b></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<b>ix. Rule 14.6.2.2 Height in relation to boundary – High Density Residential Zone</b>
33.	5.4A	Rules – Qualifying Matter Coastal Hazard Management Areas and Qualifying Matter Tsunami Management Area	Oppose in Part	Kāinga Ora seek that spatial identification of coastal hazard management areas be made available through a set of non-statutory maps, which would operate as interactive maps on the Council's GIS website – thereby operating as a separate mapping viewer to the statutory District Plan maps. This approach is different to that of the traditional means of displaying hazard overlays on district plan maps and reflects that these maps do not have regulatory effect. The advantage of this approach is the ability to operate a separate set of interactive maps which are continually subject to improvement and updates, outside of and without a reliance on the Schedule 1 Resource Management Act 1991 process. Kāinga Ora notes that this is an approach	<ol style="list-style-type: none"> <li>1. Delete all references in all rules in this section that refer to maps.</li> <li>2. Include a rule to provide for a Controlled Activity to subdivide within the Tsunami Management Area.</li> <li>3. Amend Rule 5.4A.5 NC3 as follows: <ol style="list-style-type: none"> <li>a. <b>Development, subdivision and land use that would provide for residential intensification of any site within the Qualifying Matter Tsunami Management Area except that permitted or controlled in Rules 14.4.1 and 14.4.2.</b></li> </ol> </li> <li>4. Any consequential amendments to zones, overlays, precincts, and qualifying matters to reflect the relief sought in the submission.</li> </ol>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>taken by other Councils around the country.</p> <p>Rule 5.4A.5 NC3 makes development, subdivision and land use that would provide for residential intensification of any site within the Qualifying Matter Tsunami Management Area except that permitted or controlled in Rule 14.4.1 a non-complying activity.</p> <p>Rule 14.4.2 deals with controlled activities so the rule outlined above needs to be amended to reference Rule 14.4.2.</p> <p>There is no applicable rules in the subdivision chapter for the Tsunami Management Area.</p> <p>Rule 14.4.1 provides for up to four residential units to be constructed as a permitted activity. If this level of intensification is provided for, then having a non-complying</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				activity status and an avoid policy seems nonsensical.	
<b>Chapter 6 – General Rules and Procedures</b>					
<b>6.10A – Tree Canopy Cover and Financial Contributions</b>					
34.	6.10A	<p>6.10A</p> <p>Rules 8.3, 8.5.1 and 8.7.12 - Subdivision;</p> <p>Rules 14.4.2 – 14.11.2 – Residential Built Form Standards.</p> <p>14.6.1.3 RD13.</p> <p>14.6.2.7 - Landscaping and tree cover.</p>	Oppose	<p>Kāinga Ora welcomes the Council's recognition of trees as a key element in successful urban environments.</p> <p>Kāinga Ora strongly support the Council increasing its prioritisation of the need to renew streetscapes, especially in areas where intensification has and will continue to occur. Such renewals should include kerb and channel replacement, undergrounding of overhead wires, and street tree planting.</p> <p>Kāinga Ora has substantial concerns with the 20% tree canopy cover target and considers it fundamentally</p>	Delete Section 6.10A and all associated provisions.



ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>unachievable in medium and high density environments on private land. Kāinga Ora consider the requirements to achieve 20% tree canopy cover is inconsistent with the spatial outcome requirements set out in the NPS-UD, and the Medium Density Residential Standard (MDRS) provisions of the Housing Supply Act.</p> <p>Kāinga Ora considers that the proposed financial contribution calculator is complicated and flawed, a simpler formula would be to require 1 tree to be planted per 100m<sup>2</sup> of site area, as an easier compliance threshold than a trigger of 10% of future canopy cover.</p> <p>It also has concerns with the reliance on Financial Contributions. Given that Council already own extensive areas of park and open space land (including several thousand hectares of land on</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>the Port Hills and Red Zone), in addition to extensive road reserve and local park areas, and given that Council takes Development Contributions for new parkland as part of any new development, the need for the land component to form part of the financial contributions appears to be particularly hard to justify.</p> <p>The need to provide rapid canopy cover potentially creates a perverse incentive to plant faster growing exotic species rather than natives. The proposed Financial Contribution could therefore result in a decline in biodiversity by driving developers to plant exotics over natives, with attendant adverse biodiversity outcomes, which is contrary of the desire in the Urban Forest Plan to seek diversity in tree species.</p>	
<b>Chapter 8 – Subdivision, Development and Earthworks</b>					

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
35.		Policy 8.2.2.1 – Recovery activities	Support in Part	<p>PC14 seeks to delete this policy which provides for a range of intensification opportunities in the RS and RSDT zones.</p> <p>Deletion of this policy may well be appropriate if MRZ is properly implemented across all relevant residential zones and the Kāinga Ora submission opposing the Public Transport and Airport Noise Influence Area QMs is confirmed i.e. the only areas which retain low density RS/ RSDT/ RHZ zoning are those subject to a high risk of natural hazards.</p>	Delete the policy as notified.
36.		Policy 8.2.3.2 – Connections to infrastructure	Support	<p>PC14 proposes an additional clause (g) relating to development in the vacuum sewer area. This policy provides for development in the area if connection is able to be made to a part of the waste water system that is not part of the vacuum sewer, or if sufficient capacity can be demonstrated (which could be for example through -on-site</p>	Retain Clause (g) as notified.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				holding tanks and off-peak pumping into the network).	
37.		<p>Tree Canopy and Financial Contribution provisions:</p> <p>Objective 8.2.6 and associated policies;</p> <p>Clause 8.3.1(e)-(f) – how to apply to the rules</p> <p>Clause 8.3.3(b) – financial contributions</p> <p>Clause 8.3.7 – consent notices</p> <p>Clause 8.7.12 – Assessment matters</p>	Oppose	In line with our submission seeking the deletion of the tree canopy financial contribution rules, the related proposed references to tree canopy in the subdivision chapter policies and rules is also opposed.	Delete the provisions relating to the tree canopy financial contribution and associated tree canopy rules.
38.		8.4.1.1 - Notification	Support	Support clause (a)(i) that any controlled or restricted discretionary subdivision application shall not be publicly or limited notified.	Retain 8.4.1.1 as notified.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
39.		8.5.1.2 – Controlled activities – C8 and C9	Support	Support controlled activity status for the creation of vacant allotments (C8) or allotments containing an existing or consented dwelling (C9), where these allotments comply with density standards.	Retain C8 and C9 as notified
40.		8.5.1.3 – Restricted discretionary activities – RD2(c) and RD2A	Support	Support restricted discretionary activity status where the proposed allotments do not comply with C8 or C9.	Retain RD2(c) and RD2A as notified.
41.		8.6.1 – minimum dimensions	Oppose	<p>Support the use of a minimum dimension for the creation of vacant sections. However, Kāinga Ora recommends an 8m x 15m minimum shape factor for MRZ and HRZ sites as this is demonstrated as practicable to construct a permitted medium density residential dwelling.</p> <p>The rule needs clarification that the minimum sizes apply to the creation of vacant lots, rather</p>	<p>Amend clause 8.63.1(c) as follows:</p> <p><b><u>The creation of vacant allotments that do not contain an existing or consented residential unit Allotments</u></b> in the Medium Density (including MRZ Hills), and High Density Residential Zones, shall <del>have</del> <b><u>accommodate</u></b> a <b><u>minimum dimension shape factor</u></b> of <b><u>10m 8m x 15m</u></b>. <del>Within the Medium Density Residential (Residential Hills Precinct) Zone the allotment shall have a minimum dimension of 17m x 12m.</del></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>than lots with an existing or consented dwelling.</p> <p>Similarly clarity needs to be retained that is explicit that the minimum net site provisions shall not apply to sites used exclusively for access, reserves, or infrastructure, or which are wholly subject to a designation.</p>	<p><b><u>This shape factor shall be located outside of:</u></b></p> <ol style="list-style-type: none"> <li><b><u>1. Land which may be subject to instability or is otherwise geotechnically unsuitable;</u></b></li> <li><b><u>2. Any existing or proposed easement areas required for access or services purposes;</u></b></li> <li><b><u>3. Network Utilities, including private and public lines.</u></b></li> </ol>
42.		<p>Table 1 – Minimum net site area</p> <p>Clause (a) and (c)</p> <p>Table 6 – Allotments with existing or proposed buildings</p>	Oppose	Kāinga Ora opposes both Table 1 and Table 6 and consider that the minimum shape factor provision proposed above is more appropriate	Delete Table 1 and Table 6.
44.		<p>8.9.2.1 – Earthworks</p> <p>Table 9</p>	Support in Part	<p>Earthworks are permitted through rule 8.9.2.31(P1), provided they comply with the volumes specified in Table 9.</p> <p>Table 9(d) in the Operative Plan limits earthworks to no more</p>	Amend Table 9(d) so the maximum volume is <b><u>50m<sup>3</sup>250m<sup>3</sup>/ site net fill above existing ground level</u></b>



ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>than 20m<sup>3</sup> in all residential zones. Whilst these volumes do not include earthworks associated with a Building Consent i.e foundation construction, they are invariably triggered through the formation of driveways and landscaping. In practice, a 20m<sup>3</sup> limit is frequently triggered for low density suburban development let alone medium density outcomes. As an example a standard driveway for a single dwelling is 4m wide by say 30m long = 120m<sup>2</sup>. To build the driveway requires existing earth to be removed to a depth of 20cm, and then replaced with basecourse prior to being gravelled or asphalted. There is no change to existing ground levels. The cut is 24m<sup>3</sup> (120m<sup>2</sup> x 0.2m depth), with fill being the same, resulting in 48m<sup>3</sup>.</p> <p>The rule threshold is considered to be unrealistically low, such that it generates numerous consents that are</p>	

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				<p>invariably granted. The key effects that need to be controlled with earthworks are erosion and sediment control during construction (although the scale of such works means that they are generally completed within a couple of days and therefore do not generated significant risks of sediment discharge), and permanent changes to finished ground levels that would result in overlooking of neighbouring properties i.e. forming raised mounds or terraces.</p> <p>It is therefore sought that the rule be amended so the volume is net fill above existing ground levels. It is noted that filling within Flood Management Areas is separately controlled in Chapter 5.</p>	
<b>Chapter 12 - Papakāinga/ Kāinga Nohoanga Zone and Chapter 8 subdivision</b>					
45.	12.4.1 and 12.5.1	Activity status tables and built form rules	Support in Part	Kāinga Ora seek that the Papakāinga Zone be retained	Amend the Papakāinga/Kāinga Nohoanga Zone activity table and built

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				as a specific zone, given its unique policy outcomes and function. We seek that the MRZ built form rules however apply to the Papakāinga Zone. The activity status tables and built form standards are sought to therefore be amended to align with MRZ outcomes i.e. the Papakāinga Zone rules controlling matters such as height, boundary setbacks etc should simply align with those in the MRZ.	form standards to align with the built form rules in the MRZ.
46.	Chapter 8	Subdivision provisions relating to the Papakāinga/ Kāinga Nohoanga Zone	Oppose	The suite of subdivision provisions relating to minimum site sizes for the Papakāinga/ Kāinga Nohoanga Zone are sought to also be amended to align with MRZ outcomes.	Amend the subdivision standards for the Papakāinga/ Kāinga Nohoanga Zone to align with MRZ outcomes.
<b>Residential Zone Introduction and Policy Framework – 14.1-14.2</b>					
47.	Residential	14.1(e) Introduction to residential policies	Support in Part	Helpful statement for plan interpretation	Retain statement.  Amend reference at the end of the statement to "...subclause <b>g f</b> "

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
48.	Residential	14.2.1 – Objective - housing supply	Support	Support amendments given that Christchurch has moved beyond the immediate earthquake recovery period. Support recognition that the community's housing needs may change, and that provision needs to take into account future needs.	Retain the objective
49.	Residential	Policy 14.2.1.1 – Policy – Housing distribution and density	Support in Part	<p>Support the amendments to clause (a)(ii) and (iii) that clearly state the expectation that high density residential development will be established in both the Central City and in and near identified commercial centres.</p> <p>By amending clause (iii) to now reference high density, the policy is now silent on the locations and expectation of medium density development. Given that the introduction of MRZ across most of the City, there is a need for a clear statement in the policy regarding what is now the normative housing density.</p>	<p>Retain clauses (a)(ii) and (iii).</p> <p>Add a new clause (a)(iv) as follows (with consequential renumbering of subsequent clauses):</p> <p><b><u>(iv) medium density residential development is established across the majority of the City unless precluded by a qualifying matter.</u></b></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
50.	Residential	Table 14.2.1.1a – Zone descriptions	Support	The proposed MRZ and HRZ descriptions align with the National Planning Standards descriptions.	Retain zone descriptions
51.	Residential	Policy 14.2.1.2 and 14.2.1.3	Support	Support deletion of these two policies as their original policy direction regarding the location of new medium density areas no longer aligns with the direction in the Enabling Act.	Support the deletion of these two policies.
52.	Residential	Objective 14.2.2 and associated policies 14.2.2.1-14.2.2.4 – short term recovery	Oppose	<p>Given that Christchurch is now some 12 years post-earthquake there may no longer be a need for these policies and associated mechanisms such as the 'Enhanced development mechanism' (EDM) and the 'Community Housing Redevelopment Mechanism'(CHRM).</p> <p>The housing opportunities and more enabling built form standards now provided through the MRZ and HRZ may make this suite of policies and short-term recovery tools unnecessary, however if the</p>	Delete Objective 14.2.2 and associated policies 14.2.2.1-14.2.2.4 and the associated EDM and CHRM in the event that the Public Transport accessibility QM is removed, and the Tsunami Hazard QM reduced to 1:100 year hazard.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				QM are retained and large parts of the city retain RS or RSDT then the EDM and CHRM are sought to remain as important tools.	
53.	Residential	Objective 14.2.3 and associated policies 14.2.3.1-14.2.3.5 - MDRS	Support	The objective and associated policies align with the policies mandated in the Enabling Act.	<p>Retain the objective and associated policies.</p> <p><i>Note that sequentially Policy 5 (14.2.3.3) should come at the end i.e. the policy 'batting order' should be 1 to 5 rather than the current arrangement of 1,2, 5, 3, 4.</i></p>
54.	Residential	Policy 14.2.2.2 b. iv. (Recovery housing higher density comprehensive redevelopment)	Oppose	Provided the Airport Noise Influence Area qualifying matter is deleted, the reference in Policy 14.2.2.2 b. iv. to Christchurch International Airport is unnecessary given the relevant land will be zoned for medium density residential development.	<p>14.2.2.2 Policy - Recovery housing higher density comprehensive redevelopment</p> <p>a. Enable and incentivise higher density comprehensive development of suitably sized and located sites within existing residential areas, through an Enhanced development mechanism which provides:...</p> <p>iv. <del>Christchurch International Airport</del>, arterial traffic routes, and railway lines.</p>



ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
55.	Residential	Policy 14.2.3.6 – Framework for building heights	Oppose	<p>The policy does not provide a framework or rationale for the proposed heights and does not specify what the ‘specific conditions’ might be when taller buildings would be enabled.</p> <p>There is merit in having a policy that clearly articulates the building height hierarchy, with this hierarchy tied to proximity to commercial centres and the size / range of services provided in those centres.</p> <p>The requested amendments also reflect the Kāinga Ora position that Metropolitan Centres be employed within the centres hierarchy, as per the forward-looking aspects of the NPS-UD policies of 1, 3, and 6.</p> <p>These are sought to cover the existing key activity areas for Riccarton, Papanui, and Hornby. Furthermore, the higher density zoning around the city centre and metropolitan centres, are sought to extend</p>	<p>Delete policy and replace with the following:</p> <p><b><u>Enable building heights in accordance with the planned urban built character for medium and high density areas, whilst also enabling increased building heights under specific conditions.</u></b></p> <p><b><u>Encourage greater building height, bulk, form and appearance to achieve high density planned urban form when within the proximity of nearby commercial centres to deliver:</u></b></p> <p><b><u>a. At least 10 storey buildings within 1.2km of the Central City and the Metropolitan Centre zones in Hornby, Riccarton and Papanui;</u></b></p> <p><b><u>b. At least 6 storey buildings in proximity to town centres and medium and large local centres;</u></b></p> <p><b><u>c. At least 3-4 stories everywhere else in the MRZ.</u></b></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				for 1.20 km, with a 400m Height Variation Overlay of 36m sought within 400m of the edge of these centres.	
56.	Residential	Policy 14.2.3.7 – management of increased building heights	Oppose	<p>The MDRS has the height rule as a restricted dictionary activity. MDRS Policy 5 explicitly seeks to ‘provide for developments not meeting permitted activity status, while encouraging high quality developments’.</p> <p>Taller buildings are therefore anticipated as being potentially appropriate subject to a site-specific assessment of effects. The policy needs to properly reflect that taller buildings are anticipated in appropriate locations and where the specific design properly manages the effects generated by the increase in height. As written this policy directly conflicts with Policy 5 of Sub clause 6 of Schedule 3A RMA.</p>	<p>Delete the policy and replace it with:</p> <p><u><b>Within medium and high density zoned areas, increased building heights are anticipated where:</b></u></p> <p>i. <u><b>The site has good accessibility to is public and active transport corridors, public open space, and a town or local commercial centre; and</b></u></p> <p>ii. <u><b>The design of the building appropriately manages potential shading, privacy, and visual dominance effects on the surrounding environment.</b></u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				Taller residential buildings within 1.2km of the central city can only have a positive economic impact on the CBD by enabling more people to live within walking distance of the town centre. Given the large size of Christchurch, additional enablement of residential opportunities within 1.2km facilitates more people living near the centre i.e. it draws people in, rather than resulting in existing (or potential) CBD residents shifting out.	
57.	Residential	Policy 14.2.3.8 – fire fighting water capacity	Neutral		
58.	Residential	Objective 14.2.5 – high quality residential neighbourhoods	Support in Part	<p>Support the amendments to reference the planned urban character.</p> <p>References to ‘high’ quality in the title and the start of the objective will not always be appropriate or realistic. Use of language around ‘high standard’, ‘high level of amenity’, ‘spacious and</p>	<p>Amend the objective as follows:</p> <p><b>High Good</b> quality, sustainable, residential neighbourhoods which are well designed, <del>have a high level of amenity, enhance local character and reflect to reflect the planned urban character and</del> the Ngāi Tahu heritage of Ōtautahi.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				attractive pedestrian circulation', 'high levels of glazing' can be used to set a bar that can be unrealistically high (or at least is very subjective). Kāinga Ora support high quality outcomes, however such language is subjective and is an easy stick that can be used by NIMBY opponents to higher density. Invariably multi-unit development involves the balancing of competing design outcomes (which are all perfectly valid), and it comes down to how these are balanced and prioritised – it often isn't possible to tick the optimal outcome across every matter.	
59.	Residential	Policy 14.2.5.1 – Neighbourhood character, amenity, and safety	Oppose	The matters subject to this policy are either captured in the MDRS policies which set the anticipated outcomes for MDRS, or are better articulated through proposed Policy 14.2.5.3 relating to	Delete policy.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>developments of 4 or more units.</p> <p>Policy direction for the remaining low density residential environments is provided through Policies 14.2.5.6-9.</p> <p>This policy therefore duplicates directions which are already better articulated elsewhere in the policy framework</p>	
60.	Residential	Policy 14.2.5.2 – high quality medium density residential developments	Support in Part	<p>Support the amendments to reference the planned urban character.</p> <p>References to ‘high’ quality in the title will not always be appropriate or realistic.</p>	<p>Amend policy as follows:</p> <p>14.2.5.2 Policy – <b>High Good</b> quality, medium density residential development</p> <p>Encourage innovative approaches to comprehensively designed, <b>high good</b> quality, medium density residential development, which is attractive to residents, responsive to housing demands, and provides a positive contribution to its environment (while acknowledging the need for increased densities and changes in residential</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p>character) reflects the planned urban built character of an area, through:</p> <ul style="list-style-type: none"> <li>i. consultative planning approaches to identifying particular areas for residential intensification and to defining <b>high good</b> quality, built and urban design outcomes for those areas;</li> <li>ii. encouraging and incentivising amalgamation and redevelopment across large-scale residential intensification areas;</li> <li>iii. providing design guidelines to assist developers to achieve <b>high good</b> quality, medium density development;</li> <li>iv. considering input from urban design experts into resource consent applications;</li> <li>v. promoting incorporation of low impact urban design elements, energy and water efficiency, and life-stage inclusive and adaptive design; and</li> <li>vi. recognising that built form standards may not always support the best design and efficient use of a site for medium density development, particularly for larger sites.</li> </ul>



ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
61.	Residential	Policy 14.2.5.3 – quality large scale developments	Support in Part	<p>The policy is generally appropriate and captures the key design elements necessary to support the good design of more intensive residential complexes.</p> <p>As above, ‘good quality’ is considered to be a more appropriate term than ‘high quality’.</p>	<p>Amend the policy as follows:</p> <p>14.2.5.3 Policy – <del>Good</del> <b>gQ</b> quality large scale developments</p> <p>a. Residential developments of four or more residential units contribute to a <del>high</del> <b>good</b> quality residential environment through site layout, building and landscape design to achieve:</p> <ul style="list-style-type: none"> <li>i. engagement with the street and other spaces;</li> <li>ii. minimisation of the visual bulk of buildings and provision of visual interest;</li> <li>iii. a <del>high</del> <b>good</b> level of internal and external residential amenity;</li> <li>iv. <del>high</del> <b>good</b> quality shared spaces, including communal living spaces and accessways that provide safe, direct access for pedestrians;</li> <li>v. a safe and secure environment; and</li> </ul>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					vi. public through connections for large sites with multiple public frontages.
62.	Residential	Policy 14.2.5.4 – On-site waste storage	Oppose	A policy is not necessary for this level of detail. The matters addressed by the policy are covered at an appropriate level in Policy 14.2.5.3 above.	Delete policy
63.	Residential	Policy 14.2.5.5 – Wind effects	Support in Part	While Kāinga Ora does not oppose the potential need for wind effects to be considered, the concern lays around appropriateness of Matters of Discretion, the proposed height limits triggering an assessment and technical expertise available to carry out these assessments or determine if assessments (or anticipated effects) are appropriate.	<ol style="list-style-type: none"> <li>1. Retain Policy 14.2.5.5, noting that Kāinga Ora has submitted on provisions relating to wind effects.</li> <li>2. Move all provisions relating to wind to sit under the General Rules.</li> </ol>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
64.	Residential	Objective 14.2.6 – Medium density residential zone	Oppose	The MDRS objective 2 and Policies 1-5 discussed above (objective 14.2.3 and associated policies 14.2.3.1-14.2.3.5) provide the policy framework for MDRS and as such this objective and associated policy are unnecessary	Delete the objective
65.	Residential	Policy 14.2.6.1 - MDRS	Oppose	As per comments on Objective 14.2.6	Delete the policy
66.	Residential	Policy 14.2.6.2 – local centre intensification precincts	Oppose	As discussed in the section on HRZ height limits, the proposed approach to heights and precincts is unnecessarily complicated. Local Centre Intensification Precincts are well-located for enabling more people to live in close proximity to a range of services. The area covered by this precinct is sought to be simply rezoned to HRZ, and as such this policy is no longer necessary and can be deleted.	<ol style="list-style-type: none"> <li>1. Delete the policy and associated Local Centre Intensification Precinct from the planning maps.</li> <li>2. As sought elsewhere in this submission, rezone the land within the Local Centre intensification Precinct to HRZ.</li> </ol>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
67.	Residential	Objective 14.2.7 and associated policies - HDRS	Neutral	It would thematically make more sense for these provisions to be located after the policies on MRZ, which would then lead into the policies on heights and design outcomes	Relocate the HRZ provisions so they are located after the suite of MRZ policies i.e. after Policy 14.2.3.5.
68.	Residential	Objective 14.2.7 and policies 14.2.7.1-14.2.7.3	Support	The objective and policies provide for higher density development in appropriate locations.	Retain the objective and policies.
69.	Residential	Policy 14.2.7.4 and Policy 14.2.7.5	Oppose	As set out elsewhere in this submission, the precinct approach is unnecessarily complicated. A simplified approach is sought through amendments to the HRZ height rules, with this rationalised approach to heights provided with appropriate policy support through Objective 14.2.7 and policies 14.2.7.1-14.2.7.3 (along with Policy 14.2.3.7 as sought to be amended above)	Delete the policies and the associated Large Local Centre Intensification Precincts and the High Density Residential Precincts.
70.	Residential	Policy 14.2.7.6 – High density development	Oppose	The requirement that sites be at least two stories in height may not be appropriate in a range of circumstances and is	Delete the policy.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>unnecessarily complex – there is significant theoretical capacity in these areas so maintaining design flexibility is more important than maintaining capacity.</p> <p>Whilst sites can be amalgamated, there is no requirement for amalgamation.</p> <p>It can be quite appropriate to locate building height and mass away from the road edge in high density environments, depending on site shape, size, orientation, and building design</p>	
71.	Residential	Objective 14.2.8 and policies 14.2.8.1 and 14.2.8.2 – Central City	Support	This Operative Plan objective and associated policies are proposed to be deleted in PC14. This deletion is supported as the policy direction is no longer appropriate, with the purpose of the HRZ near the central city better articulated through the proposed new replacement provisions in 14.2.8 and policies 14.2.8.1 and 14.2.8.2	Support the deletion of these provisions as shown in PC14 as notified.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
72.	Residential	Objective 14.2.8 – Future urban zone  Associated policies 14.2.8.1 to 14.2.8.7	Support in Part	<p>See comments elsewhere regarding zone labelling. The FUZ label has not been appropriately applied to existing greenfield urban zoned locations – existing urban zoned but unbuilt residential land are sought to be MRZ (unless appropriately justified QM apply). An example of just such an approach is the correct application of a HRZ around the emerging Halswell commercial centre where already zoned RNN land is yet to be built, but has a proposed HRZ applied. In the same way the balance of this RNN area is to have a MRZ applied rather than FUZ.</p> <p>Taking a consistent national view in the application of National Planning Standards, the FUZ zone label is only used in other District Plans for areas that are yet to have an operative urban zone. A FUZ is a 'holding zone' that identifies where medium to long term urban growth is anticipated.</p>	<ol style="list-style-type: none"> <li>1. Delete references to FUZ and relabel existing urban zoned but undeveloped residential land as MRZ (or HRZ if appropriately located proximate to a large commercial centre).</li> <li>2. Retain the 14.2.8 section as it provides useful direction on how the build-out of greenfield residentially zoned areas is to occur.</li> <li>3. Amend the objective as follows:   14.2.8 Objective – <u>Development of greenfield areas</u> <del>Future Urban Zone</del>   Co-ordinated, sustainable and efficient use and development is enabled in <del>the Future Urban Zone</del> <u>greenfield growth areas</u>.</li> </ol>



ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>The FUZ zone provisions are focussed on preventing rural activities from occurring that could prejudice future urbanisation e.g. quarries or intensive farming or lifestyle block subdivision. Invariably the plan frameworks require a further plan change process to be undertaken to activate or 'live zone' a residential zone that can then be developed.</p> <p>The associated policies that guide the build-out of greenfield areas remain appropriate.</p>	
73.	Residential	Policy 14.2.9.4 – Existing non-residential activities	Support in Part	<p>This existing Operative Plan policy has in practice created ambiguity when non-residential sites are proposed to be redeveloped for a different non-residential activity i.e. the reference to 'redevelopment' can be interpreted as only applying to the existing activity having new facilities, rather than enabling the site to be efficiently repurposed for a</p>	<p>Amend the policy as follows:</p> <p>Enable existing non-residential <u>sites activities</u> to continue to be used <u>for a range of non-residential activities</u> and support their redevelopment and expansion provided they do not:</p> <ul style="list-style-type: none"> <li>i. have a significant adverse effect on the <u>anticipated</u> character and amenity of residential zones; or</li> <li>ii. <u>are of a scale or activity that would undermine the role or</u></li> </ul>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>different type of non-residential activity.</p> <p>With neighbourhoods transitioning to medium density outcomes, it is important that residents have easy access to convenience retail and a range of community facilities. The adaption and repurposing of existing non-residential sites is a useful tool for enabling such provision as part of delivering good quality neighbourhoods.</p> <p>It is accepted that such changes need to be assessed on a case-by-case basis to ensure compatibility with a residential context, with the MRZ and HRZ description both anticipating that such zones will include compatible non-residential activities.</p>	<p><u>function of any nearby commercial centres. undermine the potential for residential development consistent with the zone descriptions in Table 14.2.1.1a.</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
74.	Residential	Objective 14.2.12 and Policy 14.2.12.1 – compatibility with industrial activities	Oppose	<p>Kāinga Ora considers that at the interface of industrial and residential zones the onus for managing effects rest primarily with the industrial activity. The interfaces are already existing, with the Operative Plan having long zoned industrial areas adjacent to residential zones for light industrial activities. Invariably industry is required to meet residential zone standards relating to matters such as noise or glare at the zone boundary.</p> <p>Given the existing requirements to comply with residential standards at the zone interface, combined with the General Industrial zone standards that limit heavy industry in these buffer locations, the QM setback is not considered to be appropriate with the benefits of the QM not outweighing the costs.</p>	Delete Objective 14.2.12 and Policy 14.2.12.1 and the Industrial Interface Qualifying Matter and all associated provisions.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
75.	Residential	14.3 – how to apply the rules		Kāinga Ora notes that the relevant objectives and policies are still provided for within the Plan and therefore questions the relevance of these if the Community Housing redevelopment mechanism has been deleted.	<p>Consistent with this submission, Kāinga Ora supports the deletion of the Community Housing Redevelopment Mechanism, provided Plan Change 14 is amended consistent with the relief sought in this submission.</p> <p>Kāinga Ora notes that the relevant objectives and policies are still provided for within the Plan and therefore questions the relevance of these if the Community Housing redevelopment mechanism has been deleted.</p>
<b>14.3 How to interpret and apply the rules</b>					
76.	Residential	14.3 How to interpret and apply the rules – Clause f. xvi.	Oppose	The proposed deletion is consequential to the deletion of the Airport Noise Influence Area qualifying matter, amongst others deleted here and throughout the body of this submission.	<p>f. There are parts of residential zones where the permitted development, height and/or density directed by the MDRS or Policy 3 of the NPS-UD may be modified by qualifying matters. These are identified in detail in Chapter 6.1A and the Planning Maps, and include the following:</p> <p>i. Historic Heritage including heritage items, heritage settings, <b>Residential</b></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p><del>Heritage Area, Residential Heritage Area Interface</del></p> <p><del>ii. Riccarton Bush Interface Area</del></p> <p>iii. Heritage, Significant and other Trees</p> <p>iv. Sites of Ecological Significance</p> <p>v. Outstanding Natural Features and Landscapes</p> <p>vi. Sites of Cultural Significance</p> <p>vii. Residential Character Areas</p> <p>viii. High Flood Hazard Management Area</p> <p>ix. Flood Ponding Management Area</p> <p>x. Coastal Hazard High Risk Management Area and Coastal Hazard Medium Risk Management Area</p> <p>xi. Tsunami Management Area</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					xii. Slope Hazard xiii. Waterbody Setback <del>xiv. Railway Building Setback</del> xv. Electricity Transmission Corridor and Infrastructure <del>xvi. Airport Noise Influence Area</del> xvii. Waste Water Constraint Area xviii. Lyttelton Port Influence Area <del>xix. Low Public Transport Accessibility Area</del> <del>xx. City Spine Transport Corridor</del> <del>xxi. Industrial Interface</del>
<b>14.4 Residential Suburban and RSDT Zone rules</b>					
77.	Residential	14.4.2.2 – Tree and garden planting	Oppose	The proposed amendments to this rule duplicate and confuse the regulatory framework with	Delete the proposed amendments and retain the Operative Plan rule.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>the tree FC rule – essentially it introduces two rules to control the same matter.</p> <p>Kāinga Ora oppose the tree FC rule and this rule amendment for the reasons given in the submission on the tree FC rule.</p> <p>In the event that the tree FC rule is retained, this rule is sought to simply have an advice note directing Plan users to the FC rule and the additional tree canopy outcomes sought in that separate rule.</p>	
78.	Residential	14.4.2.3 - height	Oppose	<p>This rule introduces an 8m height limit if you're in the Riccarton Bush QM and under the Airport Noise Influence Area (which is why it has a RS zoning rather than MRZ).</p> <p>Kāinga Ora have opposed before the extent of the Airport Noise Influence Area and the Riccarton Bush QM and have sought the area around</p>	<ol style="list-style-type: none"> <li>1. Delete 8m Riccarton Bush height limit.</li> <li>2. Delete 7m height rule in the Industrial Interface Qualifying matter area and apply relevant MRZ or HRZ heights.</li> </ol>



ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>Riccarton Bush is MRZ to the north and HRZ to the south, as such there is no need for an 8m height limit in the RS zone.</p> <p>Separately the height rule also introduces a 7m height limit in the industrial interface QM – which given that this is a rule being applied to the RS and RSDT zones this duplicates an existing situation. Kāinga Ora supports the deletion of this rule and application of relevant MRZ or HRZ zones and heights.</p>	
<b>14.5 Medium Density Zone Rules</b>					
79.	Residential	All controlled and RD rules re notification statements		<p>Consistent logic needs to be applied to the notification statements as follows:</p> <p>If the rule controls an internal occupant amenity matter or general street-scape outcomes then rule breaches should be non-notified as it is only the</p>	<p>1. Amend notification statements in both activity and built form rules to align with this logic.</p> <p><b>Non-notified:</b></p> <p>14.5.1.3 (RD1) – four or more units</p> <p>14.5.2.2 – landscaping</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>occupant who is affected or passers-by;</p> <p>If the rule it controls a neighbouring site interface matter then it should be open to an assessment re limited notification but should not be publicly notified. Ltd but not full;</p> <p>If it rule controls a matter that could impact on urban form at a neighbourhood scale e.g. height, then it should be open to a full s95 assessment.</p>	<p>14.5.2.5 – Outdoor Living Space</p> <p>14.5.2.8 – Outlook space</p> <p>14.5.2.9 – Fencing</p> <p>14.5.2.10 – Windows to street</p> <p>14.5.2.11 – Minimum unit size</p> <p>14.5.2.12 – Ground floor habitable space</p> <p>14.5.2.13 – Service and storage space</p> <p>14.5.2.15 – Garage and carports</p> <p>14.5.2.16 – Building reflectivity</p> <p>14.5.2.16 – mechanical ventilation</p> <p>14.5.2.18 – Spine road setbacks</p> <p><b>Open to limited but not public notification:</b></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
80.	Residential	Assessment matters	Oppose	The proposed assessment matters for both the '4 or more units' urban design rule and the built form rules are excessive and overlapping. Kāinga Ora seek that they are simplified and consolidated.	<ol style="list-style-type: none"> <li>1. For the 'non-notified' rules set out above, the matters for assessment are to be limited to the adequate provision of amenity for occupants and the delivery of a functional and attractive streetscape.</li> <li>2. For the rules that potentially affect neighbouring sites set out above, additional matters relating to consideration of the amenity of neighbouring sites are appropriate.</li> <li>3. For height, additional matters relating to urban form and proximity to services and public and active transport modes are appropriate, along with consideration of wind effects for buildings over 22m in height.</li> <li>4. For the 4+ unit urban design rule, matters of discretion are sought to be as follows: <ol style="list-style-type: none"> <li>a) <u>Whether the design of the development is in keeping with, or complements, the scale and character of development anticipated for the surrounding area and relevant significant natural, heritage and cultural features.</u></li> </ol> </li> </ol>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p>b) <u>The relationship of the development with adjoining streets or public open spaces including the provision of landscaping, and the orientation of glazing and pedestrian entrances;</u></p> <p>c) <u>Privacy and overlooking within the development and on adjoining sites, including the orientation of habitable room windows and balconies;</u></p> <p>d) <u>The provision of adequate outdoor living spaces, outdoor service spaces, waste and recycling bin storage including the management of amenity effects of these on occupants and adjacent streets or public open spaces;</u></p> <p><u>Where on-site car parking is provided, the design and location of car parking (including garaging) as viewed from streets or public open spaces</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
81.	Residential	14.5.1(P1) – Residential activity	support	<p>The proposed amendment to P1 to delete the limit on units with more than 6 bedrooms is supported. The definition of 'residential activity' includes emergency and refuge housing, and sheltered housing and so the amendment better enables such facilities to be established in the MRZ as a permitted activity where they provide accommodation for more than 6 residents.</p> <p>It is noted that boarding houses, student hostels, and retirement villages are separately defined and managed through separate rules.</p>	Retain rule as proposed.
82.	Residential	14.5.1(P3) – Elderly Persons Housing	Support in Part	Need to clarify – the Operative Plan P3 provides a permitted pathway for the conversion of Elderly Persons Housing to general tenure as a permitted activity. The provision of such a pathway is supported. PC14	<p>Either:</p> <ol style="list-style-type: none"> <li>1. Reinstate P3 so there is a clear permitted pathway; or</li> <li>2. Include an advice note under P1 as follows:</li> </ol>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>proposes to delete this pathway.</p> <p>The PC14 amendment is ambiguous as to whether the deletion of P3 means that conversion of EPH is no longer permitted, OR is it proposed to be deleted because there is now no such thing as an EPH because MDRS now enables multi-units so it is now implicit that you can convert existing EPH as such conversion would simply fall within the ambit of P1?</p> <p>Given the number of EPH in the City it is important that there is an unambiguous position on how their conversion is to be treated.</p>	<u>Conversion of existing Elderly Persons Housing is permitted under P1.</u>
83.	Residential	Controlled		PC14 deletes existing rules controlling non-compliance with tree and garden planting, ground floor habitable space, and service spaces. These are all existing Operative Plan rules rather than MDRS rules. Given	Retain controlled activity status Rule 14.5.1.2.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				that they are being retained as built form standards (apart from the overhang rule), the existing controlled activity status are sought to also be retained.	
84.		RD1 – urban design assessment	Support	Support retention of non-notified clause	Retain as notified
85.		RD27 – wind assessment	Oppose	<p>While Kāinga Ora does not oppose the potential need for wind assessments on tall buildings (above 6 storey), the concern lays around appropriateness of Matters of Discretion, the proposed height limits triggering an assessment and technical expertise available to carry out these assessments or determine if assessments (or anticipated effects) are appropriate.</p> <p>Kāinga Ora seeks that the rule provide a permitted pathway. Buildings may separately breach height rules but that is a separate matter (just as they will also invariably require</p>	<ol style="list-style-type: none"> <li>1. Delete the rule.</li> <li>2. As an alternative relief in the event that a regulatory approach to wind modelling is retained, redraft the rule to provide for a permitted pathway (for wind effects) where compliance with the specified performance standards is met.</li> <li>3. Kāinga Ora seeks that the provisions relating to wind effects are moved to sit under the General Rules.</li> </ol>



ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				consent under RD2 for more than 3 units).	
86.		D11 – industrial interface QM	Oppose	<p>Kāinga Ora considers that at the interface of industrial and residential zones the onus for managing effects rest primarily with the industrial activity. The interfaces are already existing, with the Operative Plan having long zoned industrial areas adjacent to residential zones for light industrial activities. Invariably industry is required to meet residential zone standards relating to matters such as noise or glare at the zone boundary.</p> <p>Given the existing requirements to comply with residential standards at the zone interface, combined with the General Industrial zone standards that limit heavy industry in these buffer locations, the QM setback is not considered to be appropriate with the benefits of</p>	Delete the Industrial Interface Qualifying Matter and all associated provisions.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				the QM not outweighing the costs.	
87.		14.5.2.1 – servicing advice note	Support in Part	<p>Servicing constraints mean that whilst resource consent could be granted, Building Consent could be declined if services are not available. Infrastructure constraints need to be readily searchable via on-line tool that can be readily updated, given that CCC presumably know where capacity limits are.</p> <p>The general onus is on Council to address constraints within Council-controlled networks via LTP and DC processes to enable MDRS.</p>	<ol style="list-style-type: none"> <li>1. Retain the advice note.</li> <li>2. Kāinga Ora seek that Council investigate the provision of an on-line publicly searchable tool to enable timely identification of site constraints.</li> </ol>
88.		14.5.2.2 – Landscaping and tree canopy	Oppose	In accordance with our submission seeking deletion of the tree canopy financial contribution rule, the landscaping and tree canopy rule is sought to be deleted and	<p>Delete rule and replace with the following:</p> <p><b><u>14.5.2.2 landscaped area.</u></b></p> <p><b><u>(1) A residential unit at ground floor level must have a landscaped area of a minimum of 20% of a developed site</u></b></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>replaced with the MDRS standard.</p> <p>An additional clause is proposed for non-residential activities that aligns with the MDRS outcomes.</p>	<p><u>with grass or plants, and can include the canopy of trees regardless of the ground treatment below them.</u></p> <p><u>2. The landscaped area may be located on any part of the development site, and does not need to be associated with each residential unit.</u></p> <p><u>3. Non-residential activities must have a landscaped area of a minimum of 20% of a developed site with grass or plants, and can include the canopy of trees regardless of the ground treatment below them.</u></p>
89.		14.5.2.3(i)a - Height	Support	Rule implements MDRS as per Schedule 3A	Retain rule as notified
90.		14.5.2.3(i)b – Height in local centre intensification precincts	Oppose	<p>The Local Centre Intensification Precincts are all located in close proximity to large suburban commercial centres such as Barrington and Bishopdale Malls. These areas are well placed to be HRZ.</p> <p>The areas within this precinct are sought to be rezoned to</p>	Delete clause.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				HRZ and therefore this clause can be deleted.	
91.		14.5.2.3(iv) Industrial interface and (v) Riccarton Bush	Oppose	<p>Kāinga Ora considers that at the interface of industrial and residential zones the onus for managing effects rest primarily with the industrial activity. The interfaces are already existing, with the Operative Plan having long zoned industrial areas adjacent to residential zones for light industrial activities. Invariably industry is required to meet residential zone standards relating to matters such as noise or glare at the zone boundary.</p> <p>Given the existing requirements to comply with residential standards at the zone interface, combined with the General Industrial zone standards that limit heavy industry in these buffer locations, the QM setback is not considered to be</p>	Delete 14.5.2.3(iv) and 14.5.2.3(v).

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>appropriate with the benefits of the QM not outweighing the costs.</p> <p>The area around Riccarton Bush is ideally located for supporting a High Density Residential Zone given its close proximity to a large town centre, cycleways, high frequency bus routes, and the large university activity hub</p>	
92.		14.5.2.4 – Building Coverage	Support in Part	<p>The rule implements MDRS as per Schedule 3A.</p> <p>Kāinga Ora support additional exemptions for eaves and guttering, although it is sought that this be extended to 600mm which is a standard eave depth and better provides for weather tightness design solutions. Eaves do not have a significant impact on visual dominance, and setbacks from neighbours are controlled through separate</p>	<p>Amend rule as follows:</p> <ul style="list-style-type: none"> <li>a. The maximum building coverage must not exceed 50% of the net site area.</li> <li>b. ...</li> <li>c. <b><u>Eaves and roof overhangs up to <del>300mm</del> 600mm in width and guttering up to 200mm in width form the wall of a building shall not be included in the building coverage calculation.</u></b></li> </ul>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				rules on internal setbacks and height-to-boundary.	
93.		14.5.2.5 – Outdoor living space	Support	The rule implements MDRS as per Schedule 3A	Retain rule as notified.
94.		14.5.2.6 – Height to boundary	Oppose	The provision as proposed is inconsistent with the MDRS.	Delete and replace with MDRS provision.
95.		14.5.2.7 – Building setbacks	Support in Part	<p>Support clauses (a)(i) and (ii) as implements MDRS as per Schedule 3A.</p> <p>Support clause (iii) enabling eaves and gutters to project into the road boundary setback. Extend the eave exemption to 600mm to align with standard building practice, along with enabling deeper porches which have a strong functional benefit. Such projections have a minimal impact on streetscape amenity and can have benefits through providing greater</p>	<p>1. Retain clause (a)(i) and (ii) as notified.</p> <p>2. Amend clause(a)(iii) as follows:</p> <p>Only road boundary: Eaves, <del>and</del> roof overhangs, <del>and porches</del> to a maximum of <del>300mm</del> <u>600mm</u> in width measured from the wall of a building and guttering up to 200mm in width.</p> <p>3. Amend clause (a)(iv) as follows:</p> <p>All other accessory buildings or garages, <u>including garages</u> that internally access a residential unit.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought						
				<p>articulation in the street-facing facade.</p> <p>Clause (iv) – support reduction in setbacks for accessory buildings, subject to the limitations to height and length in the rule. A grammatical amendment would be helpful to clarify that accessory buildings do not need to have internal access to the dwelling</p>							
96.		14.5.2.8 – Outlook space	Support	The rule implements MDRS as per Schedule 3A. The minor amendment to clause (i)(i) is supported.	Retain the rule as notified.						
97.		14.5.2.9 - Fencing	Support in Part	<p>Support 2m height limit on internal boundary fencing.</p> <p>The proposed rules will result in a significant loss of occupant amenity where outdoor living is located between the unit and the street. Whilst such a layout is not generally preferred, for east-west streets, the units on the southern side of the street</p>	<p>Retain clause (iii) as notified.</p> <p>Delete clauses (i) and (ii) and replace with the following (Operative Plan rule and associated diagrams reinstated):</p> <table><tr><td></td><td><b>Fence type</b></td><td><b>standard</b></td></tr><tr><td><b>i</b></td><td><b>Where at least 50% of the fence structure is</b></td><td><b>1.8m</b></td></tr></table>		<b>Fence type</b>	<b>standard</b>	<b>i</b>	<b>Where at least 50% of the fence structure is</b>	<b>1.8m</b>
	<b>Fence type</b>	<b>standard</b>									
<b>i</b>	<b>Where at least 50% of the fence structure is</b>	<b>1.8m</b>									



ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought						
				<p>will face north where it can often result in good design outcomes for the outdoor living to be located between the unit and the street to take advantage of the northern orientation.</p> <p>Retain the Operative Plan rules on road frontage fencing which are well understood by the design community and achieve an appropriate balance in occupant amenity and streetscape outcomes.</p>	<table><tr><td></td><td><u>visually transparent</u></td><td></td></tr><tr><td><u>ii</u></td><td><u>Where less than 50% of the fence structure is visually transparent</u></td><td><u>1.2m</u></td></tr></table>		<u>visually transparent</u>		<u>ii</u>	<u>Where less than 50% of the fence structure is visually transparent</u>	<u>1.2m</u>
	<u>visually transparent</u>										
<u>ii</u>	<u>Where less than 50% of the fence structure is visually transparent</u>	<u>1.2m</u>									
98.		14.5.2.10 – Windows to the street	Support in Part	<p>Clause (a) of the rule implements MDRS as per Schedule 3A.</p> <p>Clause (b) re excluding gables is supported.</p> <p>Clause (c) relating to units with large streetscene setbacks is also supported as the large setbacks mean that the streetscene outcomes sought by the rule are less relevant.</p>	<p>1. Retain clauses (a)-(d) as notified.</p> <p>2. Delete clause (e).</p>						

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>Clause (d) to incentivise front doors and their contribution towards an attractive street façade is supported.</p> <p>Clause (e), whilst trying to be enabling, adds considerable (and unnecessary) complexity to the rule for little gain.</p>	
99.		14.5.2.11 – Minimum unit size	Support	No amendments are proposed to the Operative Plan rule on minimum unit sizes. This rule is well-established and appears to be working well.	Retain rule as notified.
100.		14.5.2.12 – Ground floor habitable room	Support in Part	<p>The Operative Plan includes a rule controlling ground floor habitable rooms which is well-established and appears to be working well.</p> <p>There are two key design outcomes sought, namely 1) the ground floor on the road frontage is habitable space rather than garaging in order to deliver positive streetscape outcomes; and 2) that at least 50% of the ground floor across</p>	<p>Amend the rule as follows:</p> <p><del>a. Any building that includes a residential unit shall:</del></p> <p><del>i. Where the residential unit fronts a road or public open space, unless built over a separate ground floor residential unit, have a habitable room located at ground floor level with a minimum internal dimension of 3 metres; and</del></p> <p><del>ii. Any residential unit shall have at least 50% of any ground floor area as habitable rooms.</del></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>the site is habitable space, to avoid the ground floor of complexes being overly dominated by garaging and undercroft parking areas.</p> <p>The proposed rule is sought to be amended to better articulate these two outcomes and to avoid developments arranged as horizontally stacked low-rise apartments being unnecessarily penalised through a requirement for every unit to individually have ground floor space.</p> <p>As all MRZ now has a height limit of 11m or more, clause (b) requires amendment, noting that the outcomes of 50% habitable remains as a valid outcome for the small areas of MRZ that have a height of less than 11m through QMs.</p>	<p>a. <u>Where a residential unit fronts a road or public open space, it shall have a habitable room with a minimum internal dimension of 3 metres located at the ground floor level facing the frontage. This rule does not apply to upper-level units that are built over a separate ground floor residential unit; and</u></p> <p>b. <u>Where the permitted height limit is over 11m (refer to Rule 14.5.2.3),</u> a minimum of 50% of the ground floor area <u>across the site</u> shall be occupied by habitable spaces and/or indoor communal living space. This area may include pedestrian access to lifts, stairs, and foyers.</p> <p>c. This rule does not apply to residential units in a retirement village.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
101.		14.5.2.13 - storage	Support in Part	<p>The requirement for outdoor storage for bins and washing lines is an Operative Plan rule that appears to be working well.</p> <p>Clause (a) relating to outdoor storage is supported, although may be an unnecessary level of regulation if this matter is adequately covered by urban design assessment matters.</p> <p>Clause (b) is a new rule in PC14. It requires a minimum amount of internal storage to be provided. Whilst internal storage spaces are useful, this rule is considered to be an unnecessary level of regulation.</p> <p>It is noted that clause (a) only applies to 4 or more units, while clause (b) applies to all units i.e. it is unclear what the rationale is behind the different number of units that trigger the clauses.</p>	<ol style="list-style-type: none"> <li>1. Retain clause (a).</li> <li>2. Delete clause (b).</li> <li>3. Alternatively storage could be addressed as an assessment matter for developments of 4 or more units.</li> </ol>
102.		14.5.2.14 – Water supply for fire fighting	Neutral		

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
103.		14.5.2.15 – Garage location	Support in Part	<p>The location of car parking can have a significant impact on streetscape quality. A requirement to recess garaging or carports behind the front building line is supported.</p> <p>It is noted that this rule is only triggered where there are 4 or more units. It also does not apply to surface car parking areas which can also have a significant adverse effect on streetscape. Recessing is only required along the street frontage i.e. the rule must not apply to the front face of units located internally within a site.</p>	<p>Amend the rule as follows:</p> <p>14.5.2.15 garaging and carport building <b>and parking area</b> location</p> <p><u>When developing four or more residential units on a single site, <b>where a residential unit fronts towards a road</b>, any garage, or carport shall be located at least 1.2 metres behind the front façade of a residential unit.</u></p>
104.		14.5.2.16 – Building reflectivity; and RD29	Oppose	<p>New rule that applies to the Residential Hills Precinct – Christchurch as had residential hill suburbs for over 100 years and these areas have not given rise to excessive glare issues from dwellings. Whilst rules controlling reflectivity can be appropriate in rural ONLs where the key outcome is to minimise the visibility of</p>	Delete rule.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>structures, such an outcome is not appropriate in residential suburbs where housing is an inherent part of the landscape.</p> <p>Requiring low light reflectance values means that buildings have to be finished in dark colours which can exacerbate urban heat island effects and require increased use of air conditioning to reduce unit heating in summer.</p>	
105.		<p>14.5.2.17 – Location of outdoor mechanical ventilation;</p> <p>And RD30</p>	Oppose	<p>New rule that requires a 3m setback if at ground level between a residential unit and the road or a shared accessway. Presumably it is visual effects that are the concern.</p> <p>The rule constitutes a level of design detail that is unnecessary to regulate. If mounted at ground level then even a short 1.2m high fence is sufficient to visually screen in a</p>	Delete the rule.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>similar manner to the proposed rule on bin storage.</p> <p>As drafted the rule applies to mechanical units on the ground, whereas they would be permitted if wall-mounted despite having a worse visual outcome. It also applies to mechanical units located adjacent to internal boundaries where the property next door (over the fence) has an accessway.</p>	
106.		14.5.2.18 – Spine Road setbacks	Oppose	<p>The new rule requires buildings and outdoor living spaces to be set back 4m from spine road corridors (where the corridor is less than 24m in width, which is the majority of the corridor given 20m road reserves are typical).</p> <p>It is understood that the intention of the rule is to enable road widening in the future to accommodate public rapid transit. If Council's intention is to acquire land in the future to</p>	<ol style="list-style-type: none"> <li>1. Delete the rule.</li> <li>2. If land acquisition for public works is the intent, then Council should initiate a Notice of Requirement to designate the corridor.</li> </ol>



ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>facilitate public works then it should use the designation powers available to it.</p> <p>Given the highly developed nature of these existing corridors with lengthy sections of commercial property built to the road boundary, it is unclear how any corridor-long road widening will occur without major land acquisition and demolition.</p>	
<b>High Density Residential Zone</b>					
107.		Controlled and Restricted Discretionary notification statements	Support in Part	<p>Consistent logic needs to be applied to the notification statements as follows:</p> <p>If the rule controls an internal occupant amenity matter or general street-scape outcomes then rule breaches are sought to be non-notified as it is only the occupant who is affected or passers-by;</p>	<p>Amend notification statements in both activity and built form rules to align with this logic.</p> <p>Non-notified:</p> <p>14.6.1.3 (RD2) – four or more units</p> <p>14.6.2.7 – landscaping</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>If the rule it controls a neighbouring site interface matter then it should be open to an assessment re limited notification but should not be publicly notified. Ltd but not full;</p> <p>If it rule controls a matter that could impact on urban form at a neighbourhood scale e.g. height, then it should be open to a full s95 assessment.</p>	<p>14.6.2.10 – Outdoor Living Space</p> <p>14.6.2.4 – Outlook space</p> <p>14.6.2.5 – Building separation</p> <p>14.6.2.6 – Fencing</p> <p>14.6.2.8 – Windows to street</p> <p>14.6.2.16 – Minimum unit size</p> <p>14.6.2.9 – Ground floor habitable space</p> <p>14.6.2.11 – Service and storage space</p> <p>14.6.2.14 – Garage and carports</p> <p>14.6.2.15 – mechanical ventilation</p> <p>14.6.2.17 – Spine road setbacks</p> <p>Open to limited but not public notification:</p> <p>14.6.2.12 – Building coverage</p> <p>14.6.2.2 – height to boundary</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					14.6.2.3 – internal boundary setbacks  14.6.2.13 – Water for Firefighting (FENZ only)  Open to full s95 assessment:  14.6.2.1 – height
108.		Assessment matters	Oppose	The proposed assessment matters for both the '4 or more units' urban design rule and the built form rules are excessive and overlapping. Kāinga Ora seeks that they be simplified and consolidated.	<ol style="list-style-type: none"> <li>1. For the 'non-notified' rules set out above, the matters for assessment are sought to be limited to the adequate provision of amenity for occupants and the delivery of a functional and attractive streetscape.</li> <li>2. For the rules that potentially affect neighbouring sites set out above, additional matters relating to consideration of the amenity of neighbouring sites are appropriate.</li> <li>3. For height, additional matters relating to urban form and proximity to services and public and active transport modes are appropriate, along with consideration of wind effects for buildings over 22m in height.</li> </ol>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p>4. For the 4+ unit urban design rule, matters of discretion are sought to be as follows:</p> <p>e) <u>Whether the design of the development is in keeping with, or complements, the scale and character of development anticipated for the surrounding area and relevant significant natural, heritage and cultural features.</u></p> <p>f) <u>The relationship of the development with adjoining streets or public open spaces including the provision of landscaping, and the orientation of glazing and pedestrian entrances;</u></p> <p>g) <u>Privacy and overlooking within the development and on adjoining sites, including the orientation of habitable room windows and balconies;</u></p> <p>h) <u>The provision of adequate outdoor living spaces, outdoor</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p><u>service spaces, waste and recycling bin storage including the management of amenity effects of these on occupants and adjacent streets or public open spaces;</u></p> <p>i) <u>Where on-site car parking is provided, the design and location of car parking (including garaging) as viewed from streets or public open spaces.</u></p>
109.		RD2 and RD6 – urban design	Support in Part	<p>RD2 is the Operative Plan rule that requires an urban design assessment for more than 3 units. Clause (a)(i) of the rule implements MDRS as per Schedule 3A.</p> <p>Clause (a)(ii) and (iii) are unnecessary as the assessment of projects that do not comply with garage location and ground floor habitable space are addressed through proposed rule RD20.</p>	<p>Retain clauses (a)(i) and (b)</p> <p>Delete clauses (a)(ii) and (iii).</p> <p>Delete rule RD6</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>Given that the purpose of this rule is to enable an urban design assessment, rather than consideration of any built form rule breaches, the retention of the clause (b) 'not limited or publicly notified' clause is supported.</p> <p>Proposed RD6 simply duplicates the assessment required under RD2(a)(i) and therefore is unnecessary and is sought to be deleted.</p>	
110.		RD7 and RD 8 – building heights  14.6.2.1 - Height	Oppose	<p>The approach to managing height is unnecessarily over-complicated and seeks to introduce additional built form rules relating to outdoor living space and internal boundary setbacks as an activity standard.</p> <p>Kāinga Ora seek that the Plan be simplified so that the MRZ has a single height limit rule as per the MDRS (subject to QMs). What is currently the MDRS Local Centre</p>	<ol style="list-style-type: none"> <li>Delete these two activity rules.  Replace with:  <b><u>Buildings that do not meet Rule 14.6.2.1 Building Height.</u></b></li> <li>Retain matter of discretion reference to 'Impacts on neighbouring property – Rule 14.15.3a'.</li> <li>Delete references to: Town Centre Intensification Precinct; and replace with 'Height Variation Overlay'.</li> </ol>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>Intensification Precinct is sought to be rezoned to HRZ.</p> <p>The HRZ is sought to have two height limit areas – a 22m limit for the majority of the area taking in what are currently the MRZ Local intensification precinct, and the Large Local Centre Intensification Precinct. The extent of the HRZ is proportionate to the size of the centre so large centres support a greater walkable catchment. But the height enabled in the HRZ remains the same at 22m.</p> <p>HRZ is sought 0-1.20km from the edge of the MCZ and the CCZ.</p> <p>A 36m 'Height Variation Control' is sought to apply 0-400m from the edge of the Metropolitan Centre Zone (as sought within this submission) (Riccarton, Hornby and Papanui centres).</p>	<p>4. Subject to the relief sought above, further consequential changes may be necessary to fully incorporate the effects of the zone changes discussed in the reason related to Metropolitan Centres.</p>



ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>A 36m 'Height Variation Control' is sought to replace the High Density Residential Precinct and 0-400m from the edge of the CCZ.</p> <p>Rules controlling boundary setback, height to boundary, outdoor living space, and landscaping are all covered by other built form rules. The PC14 height to boundary rule requires at least a 6m setback from boundaries for buildings over 12m.</p> <p>Tall buildings are anticipated in the HRZ and therefore are sought to be permitted up to the height limit. Such buildings will remain subject to an assessment of qualitative urban design outcomes as covered by the urban design assessment matters for 4+ units.</p> <p>Buildings that exceed the height limits are RD, and subject to additional assessment of the</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				built form matters of discretion for height breaches.	
111.	Residential	14.6.1.3 RD13	Oppose	In accordance with our submission seeking deletion of the tree canopy financial contribution rule, the landscaping and tree canopy rule is sought to be deleted and replaced with the MDRS standard.	Delete the rule.
112.		RD17	Support in Part	<p>While Kāinga Ora does not oppose the potential need for wind assessments on tall buildings (above 6 storey), the concern lays around appropriateness of Matters of Discretion, the proposed height limits triggering an assessment and technical expertise available to carry out these assessments or determine if assessments (or anticipated effects) are appropriate.</p> <p>The rule should provide a permitted pathway. Buildings may separately breach height</p>	<ol style="list-style-type: none"> <li>1. Delete the rule.</li> <li>2. As an alternative relief in the event that a regulatory approach to wind modelling is retained, redraft the rule to provide for a permitted pathway (for wind effects) where compliance with the specified performance standards is met.</li> <li>3. Kāinga Ora seek that the provisions relating to wind effects are relocated to within the General Rules.</li> </ol>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				rules but that is a separate matter (just as they will also invariably require consent under RD2 for more than 3 units).	
113.		D1 and NC1 –education, spiritual, heath, pre-school activities	Support in Part	<p>The Operative Plan has restrictive rules controlling non-residential activities within the City Centre (Four Avenues) due to historic pressure to develop such areas for non-residential use.</p> <p>The HRZ now extends much further than the City Centre, however the restrictive ‘4 Aves’ rules have been carried over so they now apply throughout the HRZ.</p> <p>The HRZ includes areas in close proximity to the larger commercial centres where the provision of a range of community facilities is very appropriate and has long been anticipated and provided for in the District Plan. Easy accessibility to such services</p>	<ol style="list-style-type: none"> <li>1. Retain Rule D1 for education, spiritual, heath, pre-school activities located inside the Four Avenues.</li> <li>2. Adopt the MRZ provisions/ activity status for such activities located in the HRZ outside the Four Avenues.</li> </ol>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>and facilities is likewise a key element in delivering well-functioning urban environments and good quality high density residential neighbourhoods.</p> <p>Whilst retention of the existing restrictive approach to such facilities inside the Four Avenues may be appropriate, the existing framework in the Residential Medium Density Zone is considered to be more appropriate for the HRZ areas outside of the Four Avenues.</p>	
114.		Add new provisions for retail, office, and commercial service activity on the ground floor of apartment buildings		<p>It is common for apartment buildings to contain a small-scale commercial activity on the ground floor, often adjacent to the entrance foyer and as a means of buffering residential activity from what can be busy frontage roads. The provision of such services can likewise have significant convenience benefits for residents and is consistent with a good quality, high density neighbourhood. The ability to provide shared workspaces in</p>	<p>Add a new restricted discretionary and fully discretionary rule as follows:</p> <p><b><u>Retail, office, and commercial service activity</u></b></p> <p><b><u>a. Activity status: Restricted Discretionary</u></b></p> <p><b><u>Where:</u></b></p> <p><b><u>i. The retail, office, or commercial service activity is limited to the</u></b></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				apartment buildings is consistent with emerging remote working trends where people still seek companionship during the day whilst working remotely from their employer. Provided the scale of non-residential facilities is limited there is minimal potential for such to undermine the role and function of nearby commercial centres which typically cover several hectares.	<p><u>ground floor tenancy of an apartment building;</u></p> <p><u>ii. The gross floor area of the activity/activities does not exceed 200m<sup>2</sup>; and</u></p> <p><u>iii. The hours of operation are between:</u></p> <p><u>i. 7.00am and 9.00pm Monday to Friday; and</u></p> <p><u>ii. 8.00am and 7.00pm Saturday, Sunday, and public holidays.</u></p> <p><u>The Council's discretion shall be limited to the following matters:</u></p> <p><u>a. The design, appearance and siting of the activity;</u></p> <p><u>b. Noise and illumination;</u></p> <p><u>c. Signage.</u></p> <p><u>2. Activity status: Discretionary</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<u>Where compliance is not achieved with the matters specified in HRZ-RX(a)(i), (ii) and/or (iii).</u>
115.		14.6.2 – Built form standards note	Oppose	<p>The built form rules start with a new note that the standards apply “to all permitted activities and restricted discretionary RD2” i.e. 3+ units.</p> <p>This note is ambiguous as it implies that the built form standards do not apply to any non-residential activities or activities that breach other RD, D or NC rules.</p> <p>It is questionable whether the note is necessary, but if it is to be retained it would be better placed in the ‘how to use the rules’ section. Kāinga Ora seek that it simply state that in addition to being subject to the activity standards, all buildings are also subject to the built form rules.</p>	<p>1. Delete the note.  2. As an alternative relief, if the note is to be retained, then relocate it to the ‘how to use the rules’ section 14.3 as follows:</p> <p><u>In addition to being subject to the activity standards, all buildings are also subject to the built form standards.</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
116.		14.6.2.1 - Height	Support in Part	See discussion under RD7 and RD8 above.	Amend clause (a) of the rule as follows:  a. Buildings must not exceed <b>14.22</b> metres in height above ground level;  <b>b. <u>Buildings located in the Height Variation Control overlay must not exceed 36 metres in height above ground level;</u></b>
117.		14.6.2.2 – Height to boundary	Support in Part	Kāinga Ora supports the encouragement of perimeter block development and building mass at front edge. However there is some concern over if the 20m, or 60% element of the provision is appropriate. For example, the 20m length should be increased to better align with standard block sizes in the High Density Zone. Kāinga Ora is also concerned, while the intent of the rule will achieve desired development outcomes, its drafting could be simplified.	Redraft provisions to improve clarity for plan users and ensure that dimensions referred to in the provision reflects block sizes within the High Density Zone.



ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
118.		14.6.2.3 - Setbacks	Support in Part	<p>Support clauses (a) and (b)(i) as implements MDRS as per Schedule 3A.</p> <p>Support clause (b)(ii) – support reduction in setbacks for accessory buildings, subject to the limitations to height and length in the rule. A grammatical amendment would be helpful to clarify that accessory buildings do not need to have internal access to the dwelling.</p> <p>Support clause (b)(iii) enabling eaves and gutters to project into the road boundary setback. Extend the eave exemption to 600mm to align with standard building practice, along with enabling deeper porches which have a strong functional benefit. Such projections have a minimal impact on streetscape amenity and can have benefits through providing greater articulation in the street-facing facade.</p>	<p>Retain clause (a) and (b)(i) as notified.</p> <p>Amend clause (b)(ii) and (iii) as follows:</p> <p>(b) This standard does not apply to site boundaries:</p> <p>(i)...</p> <p>(ii) side and rear setbacks: for accessory buildings or garages, <b>including garages</b> that internally access a residential unit, where the accessory building or garage is less than 3 metres in height and the total length of the building does not exceed 10.1m; and</p> <p>(iii) front boundary setbacks: where eaves, <b>and</b> roof overhangs, <b>and porches</b> up to <b>300mm 600mm</b> in width and guttering up to 200mm in width from the wall of a building intrude into the boundary setback.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
119.		14.6.2.4 - Outlook Space	Support	Support as implements MDRS as per Schedule 3A. Minor amendment to clarify clause (i) is also supported.	Retain rule as notified
120.		14.6.2.5 – Building separation	Support in Part	<p>It is understood that the intent of the rule is to manage built form within the site i.e. the rule is to ensure separation between two towers on the same site, rather than provide separation with buildings on neighbouring sites (as separation to neighbours is managed through a combination of height to boundary, internal boundary setbacks and outlook space rules).</p> <p>The outcome of having reasonable space between taller built elements on the same site is supported, subject to the rule being amended to make its application clear.</p> <p>The other option is to delete the rule and rely on separation being addressed in part through the outlook space rule, plus</p>	<p>Delete the rule and replace as follows:</p> <p><u><b>Any parts of a building located more than 12m above ground level shall be separated by at least 10m from any other buildings on the same site that are also located more than 12m above ground level.</b></u></p> <p><u><b>Or alternatively, delete the rule entirely.</b></u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought									
				urban design assessment matters, and therefore this rule is unnecessary.										
121.		14.6.2.6 - Fencing	Support in Part	<p>Support 2m height limit on internal boundary fencing.</p> <p>The proposed rules will result in a significant loss of occupant amenity where outdoor living is located between the unit and the street. Whilst such a layout is not generally preferred, for east-west streets, the units on the southern side of the street will face north where it can often result in good design outcomes for the outdoor living to be located between the unit and the street to take advantage of the northern orientation.</p> <p>Retain the Operative Plan rules on road frontage fencing which are well understood by the design community and achieve an appropriate balance in occupant amenity and streetscape outcomes.</p>	<p>Retain clause (iii) relating to internal boundaries as notified.</p> <p>Delete clauses (i) and (ii) and replace with the following (Operative Plan rule and associated diagrams reinstated):</p> <table><tr><td></td><td><b><u>Fence type</u></b></td><td><b><u>standard</u></b></td></tr><tr><td><b><u>i</u></b></td><td><b><u>Where at least 50% of the fence structure is visually transparent</u></b></td><td><b><u>1.8m</u></b></td></tr><tr><td><b><u>ii</u></b></td><td><b><u>Where less than 50% of the fence structure is visually transparent</u></b></td><td><b><u>1.2m</u></b></td></tr></table>		<b><u>Fence type</u></b>	<b><u>standard</u></b>	<b><u>i</u></b>	<b><u>Where at least 50% of the fence structure is visually transparent</u></b>	<b><u>1.8m</u></b>	<b><u>ii</u></b>	<b><u>Where less than 50% of the fence structure is visually transparent</u></b>	<b><u>1.2m</u></b>
	<b><u>Fence type</u></b>	<b><u>standard</u></b>												
<b><u>i</u></b>	<b><u>Where at least 50% of the fence structure is visually transparent</u></b>	<b><u>1.8m</u></b>												
<b><u>ii</u></b>	<b><u>Where less than 50% of the fence structure is visually transparent</u></b>	<b><u>1.2m</u></b>												

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
122.		14.6.2.7 - Landscaping and tree cover	Oppose	<p>In accordance with our submission seeking deletion of the tree canopy financial contribution rule, the landscaping and tree canopy rule is also sought to be deleted and replaced with the MDRS standard.</p> <p>An additional clause is proposed for non-residential activities that aligns with the MDRS outcomes.</p>	<p>Delete rule and replace with the following:</p> <p><b><u>14.5.2.2 landscaped area</u></b></p> <p><b><u>(1) A residential unit at ground floor level must have a landscaped area of a minimum of 20% of a developed site with grass or plants, and can include the canopy of trees regardless of the ground treatment below them.</u></b></p> <p><b><u>2. The landscaped area may be located on any part of the development site, and does not need to be associated with each residential unit.</u></b></p> <p><b><u>3. Non-residential activities must have a landscaped area of a minimum of 20% of a developed site with grass or plants, and can include the canopy of trees regardless of the ground treatment below them.</u></b></p>
123.		14.6.2.8 - Windows to street	Support in Part	<p>Clause (a) of the rule implements MDRS as per Schedule 3A.</p>	<p>Retain clause (a)-(d) as notified.</p> <p>Delete clause (e).</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>Clause (b) re excluding gables is supported.</p> <p>Clause (c) relating to units with large streetscene setbacks is also supported as the large setbacks meant that the streetscene outcomes sought by the rule are less relevant.</p> <p>Clause (d) to incentivise front doors and their contribution towards an attractive street façade is supported.</p> <p>Clause (e), whilst trying to be enabling, adds considerable (and unnecessary) complexity to the rule for little gain.</p>	
124.		14.6.2.9 – Ground floor habitable rooms	Support in Part	<p>The Operative Plan includes a rule controlling ground floor habitable rooms which is well-established and appears to be working well.</p> <p>There are two key design outcomes sought, namely 1) the ground floor on the road</p>	<p>Amend the rule as follows:</p> <p><del>a. Any building that includes a residential unit shall:</del></p> <p><del>i. Where the residential unit fronts a road or public open space, unless built over a separate ground floor residential unit, have a habitable room located at ground floor level</del></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>frontage is habitable space rather than garaging in order to deliver positive streetscape outcomes; and 2) that at least 50% of the ground floor across the site is habitable space, to avoid the ground floor of complexes being overly dominated by garaging and undercroft parking areas.</p> <p>The proposed rule is sought to be amended to better articulate these two outcomes and to avoid developments arranged as horizontally stacked low-rise apartments being unnecessarily penalised through a requirement for every unit to individually have ground floor space.</p> <p>The outcome of 50% habitable at ground floor across a site is an appropriate outcome for HRZ.</p>	<p><del>with a minimum internal dimension of 3 metres; and</del>  <del>ii. Any residential unit shall have at least 50% of any ground floor area as habitable rooms.</del></p> <p>a. <u>Where a residential unit fronts a road or public open space, it shall have a habitable room with a minimum internal dimension of 3 metres located at the ground floor level facing the frontage. This rule does not apply to upper-level units that are built over a separate ground floor residential unit; and</u></p> <p>b. <del>have at least 50% of any ground floor area as habitable rooms, except on sites where at least 25% of the building footprint is more than 4 storeys, which shall have at least 30% of any ground floor area as habitable rooms.</del></p> <p><u>A minimum of 50% of the ground floor area across the site shall be occupied by habitable spaces and/or indoor communal living space. This area may include pedestrian access to lifts, stairs, and foyers.</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
125.		14.6.2.10 - Outdoor living space	support	<p>Clauses (a) and (b) implement MDRS as per Schedule 3A</p> <p>Clause (c) provides a useful reduction for studio/ 1 bed units to 15m<sup>2</sup> (ground floor) or 6m<sup>2</sup> balcony if located above ground floor.</p>	Retain rule as notified.
126.		14.6.2.11 – Storage space	Support in Part	<p>The requirement for outdoor storage for bins and washing lines is an Operative Plan rule that appears to be working well.</p> <p>Clause (a) relating to outdoor storage is supported, although may be an unnecessary level of regulation if this matter is covered by urban design assessment matters.</p> <p>Clause (b) is a new rule in PC14. It requires a minimum amount of internal storage to be provided. Whilst internal storage spaces are useful, this rule is considered to be an unnecessary level of regulation.</p>	<ol style="list-style-type: none"> <li>1. Retain clause (a), noting that if outdoor storage is addressed as an urban design assessment matter then a separate rule may be unnecessary.</li> <li>2. Delete clause (b).</li> </ol>



ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				It is noted that clause (a) only applies to 4 or more units, while clause (b) applies to all units i.e. it is unclear what the rationale is behind the different number of units that trigger the clauses.	
127.		14.6.2.12 - Building coverage	Support in Part	<p>The rule implements MDRS as per Schedule 3A.</p> <p>Support additional exemption for eaves and guttering, although this is sought to be extended to 600mm which is a standard eave depth and better provides for weather tightness design solutions. Eaves do not have a significant impact on visual dominance, and setbacks from neighbours are controlled through separate rules on internal setbacks and height-to-boundary.</p> <p>Clause (a)(ii) seeks to enable greater site coverage in the HRZ. An increase to 60% is supported and is a useful tool in differentiating between MRZ</p>	<p>1. Amend as follows:</p> <p>a. <u>The maximum building coverage must not exceed <del>50</del> 60% of the net site area;</u></p> <p>i. <u>Any eaves and roof overhangs up to <del>300mm</del> 600mm in width and guttering up to 200mm in width from the wall of a building shall not be included in the building coverage calculation.</u></p> <p>2. Delete Clause (a)(ii).</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				and HRZ. The proposed clause is however unnecessarily complex, with outdoor space and landscaping both subject to other rules and noting that the proposed ground floor habitable space rule will also necessitate the provision of ground floor outdoor living spaces.	
128.		14.6.2.13 – water supply for fire fighting	Neutral		
129.		14.6.2.14 - Garaging	Oppose	<p>Whilst the equivalent rule in the MRZ requires garaging to be recessed behind the front façade, this rule requires garaging to be located behind the rear façade of a residential unit.</p> <p>This rule is unworkable for carparking levels in apartment buildings where such parking is invariably located beneath (or above) a residential unit rather than behind the unit's rear façade.</p>	<p>Delete the rule and replace as follows:</p> <p><b><u>14.6.2.14 garaging and carports</u></b></p> <p><b><u>Where a residential unit fronts towards a road, any garage or carport shall be located at least 1.2 metres behind the front façade of a residential unit.</u></b></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>For smaller scale developments ie. 2-3 storey, having parking recessed behind the front façade provides an acceptable outcome, in combination with the urban design assessment matters for 4+ units.</p> <p>The rule wording sought in the equivalent rule in the MRZ is considered to be equally applicable.</p>	
130.		14.6.2.15 – Location of mechanical ventilation	Oppose	<p>New rule that requires a 3m setback if at ground level between a residential unit and the road or a shared accessway. Presumably it is visual effects that are the concern.</p> <p>Level of design detail that is unnecessary to regulate. If mounted at ground level then even a short 1.2m high fence is sufficient to visually screen in a similar manner to the proposed rule on bin storage.</p>	Delete the rule.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				As drafted the rule applies to mechanical units on the ground, whereas they would be permitted if wall-mounted despite having a worse visual outcome. It also applies to mechanical units located adjacent to internal boundaries where the property next door (over the fence) has an accessway.	
131.		14.6.2.16 - Minimum unit sizes	Support	No amendments are proposed to the Operative Plan rule on minimum unit sizes. This rule is well-established and appears to be working well.	Retain rule as notified.
132.		14.6.2.17 - Spine road setbacks	Oppose	<p>The new rule requires buildings and outdoor living spaces to be set back 4m from spine road corridors (where the corridor is less than 24m in width).</p> <p>It is understood that the intention of the rule is to enable road widening in the future to accommodate public rapid transit. If Council's intention is to acquire land in the future to</p>	<p>Delete the rule.</p> <p>If land acquisition for public works is the intent, then Council should initiate a Notice of Requirement to designate the corridor.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>facilitate public works then it should use the designation powers available to it.</p> <p>Given the highly developed nature of these existing corridors with lengthy sections of commercial property built to the road boundary, it is unclear how any corridor-long road widening will occur without major land acquisition and demolition.</p>	
<b>14.7 – Residential Hills Zone</b>					
133.				<p>The Residential Hills zone is an existing Operative Plan zone that covers the Port Hills Suburbs. PC14 as notified includes a QM on public transport accessibility. Areas that fall within this QM retain their existing low-density Operative Plan zoning.</p> <p>It would appear that the public transport QM is the only QM</p>	Delete zone and replace with MDZ.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				that is generating the need to retain the Residential Hills Zone. Given our submission that the public transport QM is not a valid QM and is sought to be deleted, a consequence is that the Residential Port Hills Zone is also sought to be deleted and replaced by MRZ	
<b>14.12 – Future Urban Zone</b>					
134.				See above discussion on Objective 14.2.8. The Future Urban Zone ('FUZ') is a relabelling of Residential New Neighbourhood Zone. This is the wrong label and not the intention of the National Planning Standards. FUZ are a mechanism for signalling rural areas that will be urbanised at some point in the future as a holding pattern, with the 'live' zone to be developed at a later date through a subsequent plan change process. RNN are existing well-established live	Delete the FUZ and replace with MDRZ.  The associated rules relating to build-out of these areas/ compliance with ODPs, or any area-specific rules can equally be located at the end of the MDRZ provisions.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				zones (albeit that some of them are still being built out). These areas are sought to simply be MDRZ unless there is a qualifying matter in play that would preclude MDRZ zoning.	
<b>14.14 – Community Housing Redevelopment Mechanism</b>					
136.	Chapter 14.14 – Community Housing Redevelopment Mechanism	Whole Chapter	Support	Kāinga Ora supports the deletion of the Community Housing Redevelopment Mechanism, provided Plan Change 14 is consistent with the MDRS and NPS-UD.	Kāinga Ora supports the deletion of the Community Housing Redevelopment Mechanism, provided Plan Change 14 is amended consistent with the relief sought in this submission.
<b>Chapter 15 - Commercial</b>					
137.		Related to the commercial chapter as a whole	Support in part	Kāinga Ora seeks that Metropolitan Centres are introduced within the centres hierarchy, as per the forward-looking aspects of the NPS-UD policies of 1, 3, and 6. These are sought to cover the existing key activity areas for Riccarton, Papanui, and Hornby. The size,	<ol style="list-style-type: none"> <li>1. Insert reference to Metropolitan Centres in all relevant provisions of the chapter.</li> <li>2. Insert rules for metropolitan centre zone as attached in <b>Appendix 2</b>.</li> </ol>



ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>scale, existing and future function of these centres are such that they merit the application of a Metropolitan Centre Zone classification, and thus an appropriate objective, policy and rules framework.</p> <p>Further, recent and proposed investment in public and active transport modes along the corridors in which these activity centres are located support the case for a zoning classification reflective of their relative position within the centres hierarchy.</p>	
<b>Chapter 15.2 – Commercial Policy framework</b>					
138.		Policy 15.2.2.1, Table 15.1 – Commercial zone titles	Support in part	<p>Support amendments to Table 15.1 of Policy 15.2.2.1 in so far as these reflect National Planning Standards nomenclature.</p> <p>Kāinga Ora</p>	<p>Realignment of Commercial Zone names with National Planning Standard (<b>NPS</b>) zone descriptions (Chapter 2 Interpretation). The allocation of centres to the NPS labelling appears generally appropriate if Metropolitan Centre is added.</p> <p>B. Town Centre: Key Activity Centre:</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p>Retain reference to '<i>High Density Housing is contemplated ... and around larger local centres</i>'.</p> <p>C. Local Centres: Retain reference to '<i>High Density Housing is contemplated ... and around larger local centres</i>'.</p>
138.		Table 15.1 - Centre hierarchy		<p>The role and function of centres has a direct bearing on the associated geographic extent and zoning of high density residential zoning around the centre. The hierarchy needs to reflect both current condition and potential future state in the event that enabled development occurs.</p> <p>The centre hierarchy for Local Centres in particular is considered to be unnecessarily complex and it is sought that these be simplified, along with a commensurate simplification in the heights and zoning of the surrounding residential area.</p>	<ol style="list-style-type: none"> <li>1. Amend role and function of Church Corner, Sydenham and Merivale from 'Local Centre (Large)' to 'Town Centre'.</li> <li>2. Consolidate all Local Centres into a simple category i.e. delete the distinction between 'small' and 'medium'.</li> <li>3. Incorporate Metropolitan centres and relabel Riccarton, Hornby, Papanui Northlands as such and as shown within <b>Appendix 3</b>.</li> </ol>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>Church Corner, Sydenham and Merivale are evolving and will be establishing a substantial residential catchment through development enabled by PC14. In addition, these 'centres' are positioned within corridors identified as Mass Transit Network and Growth Corridors within the Greater Christchurch 'Huihui Mai' Consultation Plan for accommodating Growth to 2050. The corresponding Council s32 Report 'Commercial Appendix 2' identifies such centres as performing a greater role in intensification enablement and diversity of function.</p> <p>The large local centres should be town centres, with small and medium local centres merged into a single 'local centre' category.</p>	
139.		Policy 15.2.2.7 – Residential activity in centres	Support in part	Amend so that the provision also provides for residential activity within Neighbourhood centres. Rule 15.5.1.1.1(P19)	Amend Policy 15.2.2.7 as follows: Residential activity in district Town, and

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				provides for such above ground floor, or to the rear of the premises fronting the street.	Local <u>and neighbourhood</u> centres Residential activity in <del>district town</del> , <u>and</u> Local <u>and neighbourhood</u> <del>neighbourhood</del> centres ....
140.		Objective 15.2.3(b) – Mixed use areas	Support in part	<p>Kāinga Ora support the principle of providing for Mixed Use Zones proximate to the City Centre Zone to transition to higher density residential neighbourhoods.</p> <p>The application of the provision is unclear however. The 'Objective Heading' refers to mixed use <u>outside the central city</u>. <b>Central City</b> is defined (in the operative Plan) as that part of the City contained within the four avenues. Whereas the amendment to Chapter 2 Interpretation to introduce '<b>City Centre – means the City Centre Zone</b>'.</p> <p>This confusion is then reinforced in Policy 15.2.3.2 where the 'heading' references Mixed Use Zones outside the central city, then conflicts with</p>	<p>Amend the objective as follows:</p> <p><b>15.1.1 Objective - Office parks and mixed use areas <u>outside the central city (except the Central City Mixed Use and Central City Mixed Use (South) Zones)</u>.</b></p> <p><b>a.</b> Recognise the existing nature, scale and extent of commercial activity within the Commercial Office and <del>Commercial</del> Mixed Use Zones, but avoid the expansion of existing, or the development of new, office parks <del>and/or mixed use areas</del>.</p> <p><b>b.</b> <u>Mixed use zones located <b>within a 15min walking distance of close to the</b> City Centre Zone transition into high density residential neighbourhoods that contribute to an improved</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>(b) which references increased opportunities within a 15 minute walking distance of the <b>City Centre Zone</b> (which would therefore include the Commercial Central City Mixed Use and Central City Mixed Use (South Frame) zones). If the aim is to deliberately exclude the Central City Mixed Use and South Frame Zones, this should be made clear, and Policy 15.2.7.1 'Diversity of Activities' amended to encourage a transition into good quality residential neighbourhoods.</p> <p>'Close' should be replaced by explicit reference to the respective zones (presumed to be the 15-minute walking distance in Policy 15.2.3.2(b)).</p> <p>Referencing a reduction in greenhouse gas emissions is superfluous in this context, given proximity and modal choice.</p>	<p><u>diversity of housing type, tenure and affordability</u> <del>and support a reduction in greenhouse gas emissions.</del></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				The intent and objectives of these amendments to the plan change do not seem to be achievable through the rules proposed. Kāinga Ora submits that it may be more appropriate to consider these zone changes and rules through a subsequent schedule 1 process.	
141.		Policy 15.2.3.2 – Mixed use	Support in part	<p>Amend ‘outside the central city’ as above.</p> <p>A ‘high quality’ residential neighbourhood is subjective and is referenced in terms of residential zone outcomes (Objective 14.2.4). Such is an inappropriately high threshold for residential development in a transitioning and Mixed Use zone. Contributing positively to quality and design is sufficient.</p> <p>Delete reference to ‘reducing greenhouse gas emissions’ as this would be immaterial at this scale, and the areas are zoned for mixed use which anticipates residential activity being</p>	<p>Amend as follows:  15.2.3.2 Policy – Mixed use areas <del>outside the central city</del> <b>(except the Central City Mixed Use and Central City Mixed Use (South) Zones)</b></p> <p><b>a.</b> Recognise the existing nature, scale and extent of retail activities and offices <b><u>in mixed use zones outside the central city in Addington, New Brighton, off Mandeville Street and adjoining Blenheim Road</u></b>, while limiting their future growth and development to ensure commercial activity in the City is focussed within the network of commercial centres.</p> <p><b>b.</b> <u>Support mixed use zones at</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>proximate to necessary facilities / employment thereby reducing trip journeys. Support for greater housing diversity and including 'alternative housing models' although noting that these are not well defined (Chapter 2 Interpretation).</p> <p>The greenway requirements in Appendix 15.15.12 and 15.15.13 are problematic to implement given the fragmented ownership of these areas. The provision of small parks and greenlinks is a matter for Council to facilitate through LGA processes and a more comprehensive place-making programme that will be vital in supporting a shift from industrial to mixed use neighbourhoods. If specific greenlinks are considered to be vital then the Council should use its designation powers to secure these spaces as a more efficient and effective method than the proposed comprehensive housing rules.</p>	<p><u>Sydenham, Addington, off Mandeville Street, and Philipstown located within a 15 minute walking distance of the City Centre Zone, to transition into <b>high good</b> quality residential neighbourhoods by:</u></p> <ul style="list-style-type: none"> <li>i. <u>enabling comprehensively designed <b>high-good</b>-quality, high-density residential activity;</u></li> <li>ii. <u>ensuring that the location, form and layout of residential development <b>supports the objective of reducing greenhouse gas emissions and</b> provides for greater housing diversity including alternative housing models;</u></li> <li>iii. <u>requiring developments to achieve a <b>high-good</b> standard of on-site residential amenity <b>to offset and improve the current low amenity industrial environment</b> and mitigate potential conflicts between</u></li> </ul>



ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p><u>uses;</u></p> <p>iv. <u>encourage small-scale building conversions to residential use where they support sustainable re-use and provide <del>high-good</del> quality living space, and contribute to the visual interest of the area.</u></p> <p><del>c. Avoid Comprehensive Residential Development of sites within the Comprehensive Housing Precinct that are identified in Appendix 15.15.12 and 15.15.13 unless the relevant shared pedestrian/cycleway, greenway or road connection is provided.</del></p> <p>d. <del>For sites identified within Appendix 15.15.12 and 15.15.13 encourage the connection to facilitate convenient and accessible through block connectivity.</del></p>
142.		Objective 15.2.4 – urban form	Support	No changes necessary.	Retain the objective as notified.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
143.		Policy 15.2.4.1 – scale and form	Support in part	<p>The foundation of this policy is found within Policy 3 of the NPS – UD. That Policy requires at clause (a) within city centre zones, building heights and density of urban form to realise as much development capacity as possible. Accordingly, the current wording of clause (i) to (v) which seek to limit building height is not supported.</p> <p>For clause (b)(i) the duplication associated with the amendment can be removed.</p> <p>For clause(b)(ii) it is considered that the District Plan should be forward looking, hence the need for building heights to be commensurate with their 'anticipated' role.</p>	<p>1. Amend Clause (a) as follows:</p> <p><b>15.2.4.1 Policy – Scale and form of development</b></p> <p>a. Provide for development of a <u>significant</u> scale and <del>form</del> <u>massing that reinforces the City's City Centre Zone's distinctive sense of place and a legible urban form <b>by enabling as much development capacity as possible to maximise the benefits of intensification, whilst managing building heights adjoining Cathedral Square, Victoria Street, New Regent High Street and the Arts Centre to account for recognised heritage and character values.</b></u> <del>in the core of District Centres and Neighbourhood Centres, and of a lesser scale and form on the fringe of these centres.</del></p> <p>2. Delete Clause (a)(i)-(v).</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p>1. Amend Clause (b) as follows:</p> <p>b. The scale and form of development in <u>other commercial</u> centres shall:</p> <ul style="list-style-type: none"> <li>i. reflect the context, character and the anticipated scale of the zone and centre's function <u>by:</u></li> <li><del>ii. providing for the tallest buildings and greatest scale of development in the city centre to reinforce its primacy for Greater Christchurch and enable as much development capacity as possible to maximise the benefits of intensification;...</del></li> </ul> <p>2. Retain the remaining parts of clause (b) as notified.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
144.		Policy 15.2.4.2 - design	Oppose	There is no basis within the MDMR Act nor NPS-UD that facilitates or provides support for the inclusion of these provisions. It is considered that the provisions introduced would function to limit or reduce potential development capacity. The provisions are not accompanied by a comprehensive s32, do not adequately recognise the functional requirements associated with commercial developments, and would not be the more appropriate in terms of achieving Objective 3.3.1 and 3.3.2 of the Plan.	Delete all inclusions introduced and retain existing Operative Plan Policy 15.2.4.2.
145.		Policy 15.2.4.6 – Strategic Infrastructure	Support in Part	This policy contains operative plan wordings using the term ‘avoiding’ in relation to noise sensitive activities and the Airport Noise Influence Area, we seek amendment to this wording to reflect management solutions are appropriate.	Amend policy 15.2.4.6 as follows:  Provide for the effective development, operation, maintenance and upgrade of strategic infrastructure and avoid adverse effects of development on strategic infrastructure through managing the location of activities and the design of stormwater areas. This includes but is not limited to, managing noise sensitive activities within commercial zones

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					located <del>within the 50 dB Ldn Air Noise Contour and</del> within the Lyttelton Port Influences Overlay Area.
146.		Objective 15.2.5(a)(i)	Support in Part	This policy contains existing Operative Plan wording that's no longer appropriate "...and limiting the height of buildings to support an intensity of commercial activity across the zone".	Amend Objective 15.2.5 as follows: <ul style="list-style-type: none"> <li>a. A range of commercial activities, community activities, cultural activities, residential activities and guest visitor accommodation are supported in the Central City to enhance its viability, vitality and the efficiency of resources, while encouraging activities in specific areas by: <ul style="list-style-type: none"> <li>i. Defining the <del>Commercial Central City Business City Centre</del> Zone as the focus of retail activities and offices <del>and limiting the height of buildings to support an intensity of commercial activity across the zone;</del></li> </ul> </li> </ul>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
147.	Central City	Policy 15.2.6.3 - Amenity	Support in part	<p>Deletion of the operative clause (ii) is supported.</p> <p>Seek deletion or amendment of inserted clause (ii) which acts as a proxy to otherwise limit height contrary to the statutory requirement of Policy 3 of the NPS-UD.</p>	<ol style="list-style-type: none"> <li>1. Support the deletion of existing clause (a)(ii).</li> <li>2. Delete the replacement Clause (a)(ii).</li> </ol>
148.	Central City	Policy 15.2.6.4 – Residential intensification	Support in part	<p>Seek moderation of the qualifier 'high quality' to either good, or 'positively contributes'.</p>	<p>Amend Policy 15.2.6.4(a) as follows:</p> <p>Encourage the intensification of residential activity within the <del>Commercial Central City Business City Centre Zone</del> by enabling <b>high-good</b> quality residential development that <b>positively contributes to supports</b> a range of <del>types of</del> residential <del>development typologies, tenures and prices,</del> with an appropriate level of amenity including:...</p>
149.	Central City	Policy 15.2.6.5 – Pedestrian focus	Oppose	<p>Delete the PC14 amendment relating to 'wind generation'. It is not considered that the respective s32 analysis demonstrates that such limits/</p>	<p>Amend Policy 15.2.6.5(ii) as follows:</p> <p>ii. requiring development to support a</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				wind rules are the most efficient or effective method.	pedestrian focus through controls over building location and continuity, weather protection, height, <del>wind generation</del> , sunlight admission, and the location of parking areas;
150.	Central City Mixed Use Zone	Objective 15.2.7 – central city mixed use	Oppose	Delete insertion of reference to 'high quality' as inappropriate in this context.	15.2.7 Objective – Role of the Central City Mixed Use Zone a. The development of vibrant, <del>high</del> <b>good</b> quality urban areas where a diverse and compatible mix of activities can coexist in support of the <del>Commercial Central City Business City Centre Zone</del> and other areas within the <del>Central City Central City</del> .
151.	Central City Mixed Use Zone	Policy 15.2.7.1 – diversity of activities	Support in part	The Central City mixed use zone is well located within easy walking and cycling distance of the wide range of services and facilities on offer. As such the height limit is sought to reflect such proximity and not be tagged or limited to colocation with large faculties, as the whole of the zone is well-	<b><u>Amend Clause (a)(viii) as follows:</u></b> viii. opportunities for taller buildings to accommodate residential activity and visitor accommodation, to support the vibrancy of the City Centre Zone, <del>where co-located with the and the nearby</del> large-scale community facilities, Te Kaha



ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				located in close proximity to these facilities.	<u>and Parakiore.</u>
152.	Central City Mixed Use Zone	Policy 15.2.8.1 - usability, Policy 15.2.8.2 - amenity	Oppose	<p>The amenity provisions introduced are too fine grain to be set as policies, are unsubstantiated by s32 analysis, do not respond to a resource management issue, and would act as detriment to development. Kāinga Ora seek that these be deleted.</p> <p>Policy 15.2.8.2(viii) is not opposed, subject to the amendments sought above as to setting an appropriate urban design context, and not set at 'high quality'.</p>	<ol style="list-style-type: none"> <li>1. Retain Policy 15.2.8.1 as existing in the Operative Plan and delete all PC14 amendments.</li> <li>2. Retain Policy 15.2.8.2 as existing in the Operative Plan and delete all PC14 amendments, with the exception of clause (viii) which is sought to be retained.</li> </ol>
153.	Central City Mixed Use Zone	Policy 15.2.8.3 – residential development	Oppose	The requirements in the NPS-UD to facilitate differing housing typologies and provide intensification opportunities is disenabled by provisions seeking excessive private amenity space.	<p>Delete amendments seeking improved private amenity space, compensatory to the predominantly commercial nature of the Central City Mixed Use Zone.</p> <p><b>15.2.8.3 Policy Residential Development</b></p> <p>a. provide for ...</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					b. <u>Require a level of private amenity space for residents that is proportionate to the extent of residential activity proposed.</u> <del>and which compensates for the predominantly commercial nature of the area, including</del> consistent with the intended built form and mix of activities within that environment, through:...
154.	Central City Mixed Use Zone (South Frame)	Policy 15.2.10.2 – residential development	Support	Policy amendments appropriately recognise area context.	Retain policy as notified
<b>15.4 – Commercial Zone rules</b>					
155.	Town Centre Zone Rules  Local Centre Rules  Neighbourhood Centre Zone	City Spine Transport Corridor  15.4.1.3(RD8)  15.5.1.3(RD8)  15.6.1.3(RD7)	Oppose	Delete the provision in its entirety. The provision is not justified in terms of s32, is not the most appropriate mechanism to secure increased road widths, or proxy road reserve planting and landscaping at the expense of developable area. Provision and Qualifying matter is not	Delete all City Spine Transport Corridor activity rules from the suite of commercial zones.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
	Large Format Retail Zone  Mixed Use Zone	15.8.1.3(RD3)  15.10.2.10		supported by Policy 4/ clause 3.32 of the NPS-UD. Inconsistency with design outcomes specified in Rule 15.4.2.3, including clause (i) Key Pedestrian Frontages as associated with Riccarton, Church Corner, Merivale and Papanui Centres.  If road widening is required to facilitate rapid transit infrastructure then Council should use its designating powers.	
156.	Town Centre Zone Built Form Standards  Local Centre Built Form Standards	15.4.2.1(a)(ii)  15.5.2.1(a)(i)	Oppose / cl16(b)	Delete erroneous reference to Local Centre in 15.4.2.1(a)(ii)  Delete erroneous reference to Town Centre in 15.5.2.1(a)(i)	<del>ii. 1,000m<sup>2</sup> GLFA where located in a Neighbourhood Local Centre identified in Policy 15.2.2.1, Table 15.1</del>  <del>ii. 4,000m<sup>2</sup> GLFA where located in a District Town Centre as identified in Policy 15.2.2.1, Table 15.1; or</del>
157.	Town Centre Zone Built Form Standards	14.4.2.2 Maximum Building Height	Support in part	Increased development capacity is sought to be enabled specifically at Hornby,	1. Adopt Metropolitan Centre Zone Rules proposed in the Kāinga Ora submission <b>Appendix 2</b> and amend

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought												
				<p>Riccarton and Papanui noting that the role and function of these centres is already straddling that associated with the role and function of Metropolitan Centres as set out within the National Planning Standards. The adoption of the Metropolitan Centre Rules Kāinga Ora seeks would take into account that role and function (including social amenity) would be anticipated to grow and diversify given the anticipated level of residential catchment growth. An appropriate height limit is accordingly 36m.</p> <p>For the remaining Town Centres, noting anticipated corridor growth and development as associated with Sydenham, Merivale and Church Corner (elevating these centres to Town Centres in the retail hierarchy) (refer submission to Table 15.1) a height limit of 22m is the more appropriate.</p>	<p>these rules as appropriate.</p> <p>2. Amend rule 14.4.2.2 as follows:</p> <p>a. The maximum height of any building shall be as follows:</p> <table><tr><td></td><td><b>Applicable to</b></td><td><b>Standard</b></td></tr><tr><td>i.</td><td>All sites in a <del>District Town Centre</del> (other than specified below)</td><td><del>20</del> metres</td></tr><tr><td>ii.</td><td><u>All sites in a Town Centre at Riccarton, or Hornby or Papanui</u></td><td><u>22 metres</u></td></tr><tr><td>iii.</td><td>...</td><td></td></tr></table>		<b>Applicable to</b>	<b>Standard</b>	i.	All sites in a <del>District Town Centre</del> (other than specified below)	<del>20</del> metres	ii.	<u>All sites in a Town Centre at Riccarton, or Hornby or Papanui</u>	<u>22 metres</u>	iii.	...	
	<b>Applicable to</b>	<b>Standard</b>															
i.	All sites in a <del>District Town Centre</del> (other than specified below)	<del>20</del> metres															
ii.	<u>All sites in a Town Centre at Riccarton, or Hornby or Papanui</u>	<u>22 metres</u>															
iii.	...																

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
158.	Town Centre Zone Built Form Standards	Sunlight and Outlook 15.4.2.5	Oppose in part	Refer submission point relating to amended Recession Planes as a Qualifying Matter and changes to Appendix 14.16.2.	Consequential amendments associated with Appendix 14.16.2.
	Local Centre Zone Standards	15.5.2.5			Adopt Metropolitan Centre Zone Rules proposed in the Kāinga Ora submission <b>Appendix 2</b> and amend these rules as appropriate.
	Neighbourhood Centre Zone Standards	15.6.2.4			
	Large Format Zone	15.8.2.4			
	Commercial Office Zone	15.9.2.4			
	Mixed Use Zone	15.10.2.4			
	City Centre Zone	15.11.2.9			
	Central City Mixed Use Zone	15.12.2.6			

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought						
159.	Town Centre Zone Built Form Standards  Local Centre Zone Standards  Neighbourhood Centre Zone Standards  Large Format Zone  Mixed Use Zone  City Centre – Mixed Use Zone	City Spine Transport Corridor 15.4.2.10  15.5.2.10  15.6.2.11  15.8.2.13  15.10.1.3 (RD5)  15.12.2.13 / 15.12.1.3(RD6)	Oppose	Delete the provision in its entirety. The provision is not justified in terms of s32, is not the most appropriate mechanism to secure increased road widths, or proxy road reserve planting and landscaping at the expense of developable area. Provision and Qualifying matter is not supported by Policy 4/ clause 3.32 of the NPS-UD.	Delete all City Spine Transport Corridor built form rules from the suite of commercial zones.						
160	Local Centre Zone Built Form Rules – Maximum Building Height	15.5.2.2		Support in part  As identified in the submission point on Town Centre heights – Merivale, Church Corner and Sydenham are sought to be elevated to a ‘Town Centre’ zone and provided with a 22m height limit.	Replace the table in 15.5.2.2 as follows (with Merivale, Church Corner and Sydenham elevated in Table 15.1 to Town Centre zoning): <table><tr><td></td><td>Applicable to</td><td>Standard</td></tr><tr><td>ii</td><td>Ferrymead and all sites in a Local Centre (medium)</td><td>20 metres</td></tr></table>		Applicable to	Standard	ii	Ferrymead and all sites in a Local Centre (medium)	20 metres
	Applicable to	Standard									
ii	Ferrymead and all sites in a Local Centre (medium)	20 metres									

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought												
				<p>In the alternative, they are sought to be afforded a 22m height limit as Local Centre (Large).</p> <p>As sought above the remaining medium centres and Ferrymeed are sought to become 'large' Local Centres, with the 'small' Local Centres simply being 'local centres'.</p> <p>In terms of heights, the new large centres are sought to have a consistent 22m height limit to provide for additional capacity and conformity with the proposed HRZ height limits adjoining these centres within this submission. The exception is New Brighton, given qualifying matters associated with appropriate natural hazards reduce intensification opportunities.</p> <p>All remaining Neighbourhood Centres are sought to have a standard height limit of 14m to provide a scale commensurate</p>	<table><tr><td></td><td><u>as identified in Table 15.1 of Policy 15.2.2.1, excluding New Brighton.</u></td><td></td></tr><tr><td>ii.</td><td><u>New Brighton and all sites in a Local Centre (small) as identified in Table 15.1 of Policy 15.2.2.1</u></td><td><u>14metres</u></td></tr></table> <p>Or in the alternative:</p> <p>15.5.2.2 Maximum building height</p> <p>a. The maximum height of any building shall be as follows:</p> <table><tr><th></th><th>Applicable to</th><th>Standard</th></tr><tr><td>i</td><td><u>Merivale, Church Corner and Sydenham North (Colombo Street between Brougham Street and Moorhouse Avenue)</u></td><td><u>22 metres</u></td></tr></table>		<u>as identified in Table 15.1 of Policy 15.2.2.1, excluding New Brighton.</u>		ii.	<u>New Brighton and all sites in a Local Centre (small) as identified in Table 15.1 of Policy 15.2.2.1</u>	<u>14metres</u>		Applicable to	Standard	i	<u>Merivale, Church Corner and Sydenham North (Colombo Street between Brougham Street and Moorhouse Avenue)</u>	<u>22 metres</u>
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ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought															
				with the surrounding MRZ areas and to differentiate from the 12m height limit applying to Neighbourhood Centres.	<table><tr><td>ii</td><td><b><u>Ferryhead</u> and all sites in a Local Centre (medium) as identified in Table 15.1 of Policy 15.2.2.1, excluding New Brighton.</b></td><td><b>20 metres</b></td></tr><tr><td>ii.</td><td><b>New Brighton and all sites in a Local Centre (small) as identified in Table 15.1 of Policy 15.2.2.1</b></td><td><b>14 metres</b></td></tr><tr><td>i. —</td><td><b>All sites in a District Centre</b></td><td><b>20 metres</b></td></tr><tr><td>ii.</td><td><b>Any building in a District Centre within 30 metres of an internal boundary with a residential zone</b></td><td><b>12 metres</b></td></tr><tr><td>iii. i.</td><td><b><u>All sites in a Neighbourhood Local Centre (small) as identified in Table 15.1 of Policy 15.2.2.1.</u></b></td><td><b><u>12 metres</u></b></td></tr></table>	ii	<b><u>Ferryhead</u> and all sites in a Local Centre (medium) as identified in Table 15.1 of Policy 15.2.2.1, excluding New Brighton.</b>	<b>20 metres</b>	ii.	<b>New Brighton and all sites in a Local Centre (small) as identified in Table 15.1 of Policy 15.2.2.1</b>	<b>14 metres</b>	i. —	<b>All sites in a District Centre</b>	<b>20 metres</b>	ii.	<b>Any building in a District Centre within 30 metres of an internal boundary with a residential zone</b>	<b>12 metres</b>	iii. i.	<b><u>All sites in a Neighbourhood Local Centre (small) as identified in Table 15.1 of Policy 15.2.2.1.</u></b>	<b><u>12 metres</u></b>
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ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought									
					<table><tr><td>iv.</td><td><del>Other locations</del></td><td><del>17 metres</del></td></tr><tr><td>ii.</td><td><del>All sites in a Neighbourhood Local Centre (medium) as identified in Table 15.1 of Policy 15.2.2.1.</del></td><td><del>14 metres</del></td></tr><tr><td>iii.</td><td><del>All sites in a Neighbourhood Local Centre (large) as identified in Table 15.1 of Policy 15.2.2.1.</del></td><td><del>20 metres</del></td></tr></table>	iv.	<del>Other locations</del>	<del>17 metres</del>	ii.	<del>All sites in a Neighbourhood Local Centre (medium) as identified in Table 15.1 of Policy 15.2.2.1.</del>	<del>14 metres</del>	iii.	<del>All sites in a Neighbourhood Local Centre (large) as identified in Table 15.1 of Policy 15.2.2.1.</del>	<del>20 metres</del>
iv.	<del>Other locations</del>	<del>17 metres</del>												
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iii.	<del>All sites in a Neighbourhood Local Centre (large) as identified in Table 15.1 of Policy 15.2.2.1.</del>	<del>20 metres</del>												
161.	Neighbourhood Centre Zone – Built Form Standards	15.6.2.1 - Height	Support in part	<p>The increase in height of buildings from 8m to 12m is supported.</p> <p>Within the Central City, an increased height to 32m is the more appropriate, given these areas are surrounded by HRZ.</p>	<p>Amend rule 15.6.2.1 as follows:</p> <p>15.6.2.1 Maximum Building Height</p> <p><b>a.</b> The maximum height of any building shall be as follows:</p> <table><tr><th></th><th>Applicable to</th><th>Standard</th></tr><tr><td>i.</td><td>All sites unless specified below</td><td>8 <u>12</u> metres</td></tr><tr><td>ii.</td><td><u>For sites within the Central City</u></td><td></td></tr></table>		Applicable to	Standard	i.	All sites unless specified below	8 <u>12</u> metres	ii.	<u>For sites within the Central City</u>	
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ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought		
					<table><tr><td><del>located:</del> <del>a. To the east of Barbadoes Street</del> <del>b. To the west of Barbadoes Street</del></td><td><del>20m</del>  <del>32m</del></td></tr></table>	<del>located:</del> <del>a. To the east of Barbadoes Street</del> <del>b. To the west of Barbadoes Street</del>	<del>20m</del>  <del>32m</del>
<del>located:</del> <del>a. To the east of Barbadoes Street</del> <del>b. To the west of Barbadoes Street</del>	<del>20m</del>  <del>32m</del>						
162.	Mixed Use Zone	15.10.1.1 Activity rules	Support in Part	<p>Support the enablement of residential in P27, subject to deletion of the ‘Comprehensive Housing Precinct’.</p> <p>The rule framework does not enable the suite of community activities that are inherent in good quality mixed use neighbourhoods. The rule framework must enable activities such as preschools, education, spiritual, health, community faculties, and convenience retail to support the emergence of a genuinely mixed use neighbourhood. The activity standards for these activities in the MRZ are equally</p>	<ol style="list-style-type: none"><li>1. Amend P27 to delete clause (b) relating to the Comprehensive Housing Precinct.</li><li>2. Add additional activity rules enabling a suite of community activities i.e. rules 14.5.1.1 P5-P13, P20.</li></ol>		

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>appropriate and set appropriate limits on activity size to ensure effects of larger facilities are able to be assessed.</p> <p>Such activities do not generally give rise to retail distribution effects, and will not give rise to reverse sensitivity effects given the clear change in outcomes sought for these areas and the enablement of residential activity throughout the mixed use zone.</p>	
163.	Mixed Use Zone	15.10.2.1 - Height	Support in part	<p>The insertion of (b) providing for higher intensity of residential development is supported. However a height limit of 22m is considered the more appropriate for consistency with the height limits proposed within this submission, and appropriate levels of enablement, along with the unnecessary need to differentiate between the heights of buildings depending on where they are located on the site.</p>	<p>Amend rule 15.10.2.1 as follows:</p> <p>Maximum building height</p> <ul style="list-style-type: none"> <li>a. The maximum height of any building shall be 15 metres, <u>unless specified below.</u></li> <li>b. <u>The maximum height of any Comprehensive Residential Development located within the Comprehensive Housing Precinct (shown on the</u></li> </ul>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p><u>planning maps) shall be <del>21</del> 22 metres, <del>for buildings located adjacent to the street, or 12 metres for buildings located at the rear of the site.</del></u></p>
164.	Mixed Use Zone – Comprehensive Residential Development	<p>15.10.1.1(P27)</p> <p>15.10.1.3 (RD3 / RD4) Comprehensive Residential Development</p> <p>15.10.2.9 Minimum Standards for Comprehensive Residential Development.</p> <p>15.14.3.40 Assessment Matters Comprehensive Redevelopment</p> <p>15.10.1.5(NC3)</p> <p>Appendix 15.15.12 – Sydenham and Appendix 15.15.13. Appendix 15.15.14</p>	Oppose	<p>These provisions are overtly complicated, unworkable and provide inappropriate mechanisms to manage development and acquire public laneways (Appendix 15.15.12 – Sydenham and Appendix 15.15.13).</p> <p>Clarity needs to be improved in (P27) that those provisions apply to all MUZ except:</p> <ul style="list-style-type: none"> <li>(i) Blenheim Road / Main South Road 15.10.1.4(D1); and</li> <li>(ii) Comprehensive Housing Precinct (15.10.1.3 (RD3) and (RD4).</li> </ul>	<p>Delete all existing provisions and provide a suite of workable and clear rules that encourage and enable large scale redevelopment.</p> <p>Remove statutory impediments in Appendix 15.15.12 – Sydenham and Appendix 15.15.13 requiring ‘Greenways’ and ‘Shared Pedestrian / Cycleways’ and seek to facilitate through more appropriate means – such as negotiated purchase.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>Reference in 15.10.1.3(RD3) to 15.14.3.40(a)(iv) and (v) is incorrect, as these provisions do not exist.</p> <p>The respective matters identified in relation to 15.10.1.3(RD4) are overly excessive and broad.</p> <p>15.10.1.5(NC3) has the statutory function of deeming all Comprehensive Residential Development within the precinct identified for such (at Appendix 15.15.12 and 15.15.13) non-complying. This inconsistency and error needs to be corrected.</p> <p>The matters expressed in 15.14.3.40 are overly excessive and broad (effectively not restricting the matters to be assessed), lack certainty of achievement, and are absent a resource management purpose. Collectively these matters are the antithesis of the achievement of Objective 3.3.1</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>and Objective 3.3.2 and will disenable investment and redevelopment. Reference is sought to be made to a good quality living environment that positively contributes to local amenity as a high quality environment is contextually unobtainable in a transitioning Mixed Use Environment.</p> <p>The requirements in Appendix 15.15.12 – Sydenham and Appendix 15.15.13. Appendix 15.15.14 are not the most appropriate in terms of s32 of the Act, and will act to disenable redevelopment and the purpose of the Zone.</p>	
165.	Central City Zone	15.11.1.1(P18) – Small buildings	Support	Support the introduction of a permitted pathway for small buildings where the built form rules and activity standards are sufficient to deliver acceptable urban design outcomes and the need for a separate urban design assessment/ consent is able to be avoided.	Retain P18 as notified.



ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
166.	Central City Zone	15.11.1.2(C1)	Oppose	<p>Additions to C1 are not in accordance with the statutory requirements of the NPS-UD, Sections 77G or 77H of the Resource Management Act, nor Objective 3.3.1 and 3.3.2 of the Plan. The provisions would act as proxies to otherwise reduce development capacity.</p> <p>The Operative Plan controlled activity status for urban design assessments is sought to be retained.</p>	Delete proposed PC14 amendments to the rule i.e. retain the Operative Plan provision.
167.	Central City Zone  Central City Mixed Use Zone	Residential Activity  15.11.1.3(RD4) Matters (b) and (c)  15.12.1.3(RD)(b) and (c)	Oppose	<p>Additional controls are unnecessary and inappropriate. These matters are able to be addressed by existing matters (i.e 15.14.2.9(b) and 15.14.2.9(d).</p>	<p>Amend the rule by deleting clauses (b) and (c) as follows:</p> <p>a. Residential activity in the <del>Commercial Central City Business City Centre</del> and Central City Mixed Use Zones – Rule 15.134.2.9</p> <p><del>b. Glazing – 15.14.3.37</del></p> <p><del>c. Outlook spaces – 15.14.3.38.</del></p>
168.	Central City Zone	Buildings  15.11.1.3(RD5)	Oppose	<p>As a consequential amendment to the relief sought in this submission to delete various</p>	<p>Amend rule by deleting clauses (m) and (n) as follows:</p> <p><del>m. Upper floor setbacks, tower</del></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought			
				built form rules, the activity status rule also needs amending to remove reference to rule breaches with the built form rules on wind, upper floor setbacks and tower dimension.	<del>dimension and site coverage – Rule 15.14.3.35</del> <del>n. Wind – Rule 15.14.3.39</del>			
169.	Central City Zone	Sunlight and Outlook for the street 15.11.2.3	Oppose	Acts as a proxy to limit development capacity in the Central City in a manner that is not founded in the NPS-UD Policy 3.	Delete rule			
170.	Central City Zone	Building Height – 15.11.2.11	Support in part	<p>There is an inconsistency between the definition of Building Base and the rule. The definition of Building Base is sought to be deleted, as it is internally inconsistent with provisions in the Plan and is uncertain in purpose.</p> <p>Building Base is defined as: <i>‘In respect to the City Centre and Central City Mixed Use Zones, means any part of any building that is below the maximum permitted height for that type of building in the zone’.</i></p>	<p>1. Amend definition of Building Base as:</p> <p><del>Building Base: In respect to the City Centre and Central City Mixed Use Zones, means any part of any building that is below the maximum permitted height for that type of building in the zone.</del></p> <p>2. Amend rule as follows:</p> <table><tr><td></td><td>Applicable to</td><td>Standard</td></tr></table>		Applicable to	Standard
	Applicable to	Standard						

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought									
					<table><tr><td>i.</td><td>All buildings, except as provided for in ii, <del>and</del> iii <b>and iv</b> below.</td><td><b>A.</b> The maximum height shall be <u>90 metres</u>. <b><del>B.</del></b> <del>The <u>maximum height of the building base shall be 28 metres.</u></del>  in accordance with the Central City Maximum Building Height planning map</td></tr><tr><td>ii.</td><td>All buildings in the <u>heritage setting</u> of New Regent Street as identified in <u>Appendix 9.3.7.2.</u></td><td>The minimum and maximum height shall be 8 metres.</td></tr><tr><td>iii.</td><td>All buildings at the Arts Centre, being land bordered by Montreal Street,</td><td>The maximum height shall be 16 metres.</td></tr></table>	i.	All buildings, except as provided for in ii, <del>and</del> iii <b>and iv</b> below.	<b>A.</b> The maximum height shall be <u>90 metres</u> . <b><del>B.</del></b> <del>The <u>maximum height of the building base shall be 28 metres.</u></del>  in accordance with the Central City Maximum Building Height planning map	ii.	All buildings in the <u>heritage setting</u> of New Regent Street as identified in <u>Appendix 9.3.7.2.</u>	The minimum and maximum height shall be 8 metres.	iii.	All buildings at the Arts Centre, being land bordered by Montreal Street,	The maximum height shall be 16 metres.
i.	All buildings, except as provided for in ii, <del>and</del> iii <b>and iv</b> below.	<b>A.</b> The maximum height shall be <u>90 metres</u> . <b><del>B.</del></b> <del>The <u>maximum height of the building base shall be 28 metres.</u></del>  in accordance with the Central City Maximum Building Height planning map												
ii.	All buildings in the <u>heritage setting</u> of New Regent Street as identified in <u>Appendix 9.3.7.2.</u>	The minimum and maximum height shall be 8 metres.												
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ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought									
					<table><tr><td></td><td>Worcester Street, Rolleston Avenue and Hereford Street.</td><td></td></tr><tr><td>iv</td><td>All buildings within the Cathedral Square Height Precinct</td><td><p>A. The maximum height shall be 45 metres.</p><p><del>B. The maximum height of the building base shall be 28 metres.</del></p></td></tr><tr><td>v.</td><td>All buildings within the Victoria Street Height Precinct</td><td><p>A. The maximum height shall be 45 metres.</p><p><del>B. The maximum height of the building base shall be 28 metres.</del></p></td></tr></table>		Worcester Street, Rolleston Avenue and Hereford Street.		iv	All buildings within the Cathedral Square Height Precinct	<p>A. The maximum height shall be 45 metres.</p> <p><del>B. The maximum height of the building base shall be 28 metres.</del></p>	v.	All buildings within the Victoria Street Height Precinct	<p>A. The maximum height shall be 45 metres.</p> <p><del>B. The maximum height of the building base shall be 28 metres.</del></p>
	Worcester Street, Rolleston Avenue and Hereford Street.													
iv	All buildings within the Cathedral Square Height Precinct	<p>A. The maximum height shall be 45 metres.</p> <p><del>B. The maximum height of the building base shall be 28 metres.</del></p>												
v.	All buildings within the Victoria Street Height Precinct	<p>A. The maximum height shall be 45 metres.</p> <p><del>B. The maximum height of the building base shall be 28 metres.</del></p>												

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<div> <div>vi. <u>All buildings in the Central City Heritage Qualifying Matter and Precinct, including the following areas:</u></div> <div>...</div> <div>The maximum height shall be 28 metres.</div> </div>
171.	Central City Zone	Maximum Road Wall Height - 15.11.2.12  Building Tower Setbacks - 15.11.2.14  Maximum building tower dimension and building tower coverage – 15.11.2.15  15.11.2.16 Minimum building tower separation  15.11.2.17 Wind	Oppose	<p>These provisions, both individually and collectively act as proxies to restrict height and associated development capacity in the Central City Zone.</p> <p>The retention (and addition) of height rules in the City Centre zone simply does not give effect to the NPS-UD Policy 3 direction to “enable in city centre zones, building heights and density of urban form to realise as much development capacity as possible, to maximise benefits of intensification.</p>	Delete all these provisions.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>The proposed wind standards are inappropriate (as set between 4m/s to 6m/s more than 5% annually at ground level within 100m of a proposal.) The Technical data used in support of the provision identifies that measured wind levels already typically exceed these levels without development. There is no supporting s32 considering the benefits and costs associated with this provision.</p> <p><i>“Christchurch is a relatively windy city with a background mean wind speed of about 4 m/s (at 10 m above the ground). At the airport for example, the mean wind speed exceeds 4 m/s about 45% of the time, exceeds 6 m/s about 21% of time, and exceeds 8 m/s about 11% of the time”.<sup>1</sup></i></p>	
172.	Central City Mixed Use Zone	15.12.1.1(P16)(a)(iii)	Oppose	Delete as this matter is appropriately managed through	Amend rule by deleting clause (a)(iii).

<sup>1</sup> Technical Advice for Wind Assessments for Christchurch Cit. Meteorology Solutions (2022). [Section 2. Context]

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				screening and controls in Rule 15.12.2.5 'Screening'	
173.	Central City Mixed Use Zone	15.12.1.1(P16)(c)(iii)	Oppose	Requirement is seen as excessive within this context as these areas are not necessarily mutually exclusive.	Amend rule by deleting clause (c)(iii).
174.	Central City Mixed Use Zone	15.12.1.1(P16)(j)	Oppose	This requirement is seen as excessive within this context as a higher density of residential activity should be encouraged, with standards for outdoor and communal living space being used to provide appropriate levels of amenity.	Amend rule by deleting clause (j).
175.	Central City Mixed Use Zone	15.12.1.3(RD2) – Buildings	Oppose	Additional matters of discretion associated with Upper Floor Setbacks, and Glazing are unnecessary and not the more appropriate provisions.	Amend rule by deleting clauses (k) upper floor setbacks and (l) glazing.
176.	Central City Mixed Use Zone	15.12.1.3(RD4) – Four or more residential units	Oppose	Matters of discretion associated with Upper Floor Setbacks, and Glazing are unnecessary and not the more appropriate provisions. The matters in 15.5.1 are considered	Amend rule by deleting clauses (b) outdoor living space and (c) glazing.



ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				appropriately broad to ensure an appropriate balance between private, communal and public amenity.	
177.	Central City Mixed Use Zone	15.12.2.1 'Street scene, landscaping and trees'	Oppose	The proposed landscaping requirements are excessive and inappropriately reduce development opportunities. The operative plan rule is sought to be retained and PC14 amendments deleted.	Delete PC14 amendments and retain operative plan rule.
178.	Central City Mixed Use Zone	15.12.2.2	Support in part	<p>The maximum height of 32m is supported as being appropriately enabling within a proximate distance to the City Centre Zone.</p> <p>The restrictions associated with the rule are opposed as being unnecessary, in conjunction with the absence of clarity in the definition associated with 'building base' as discussed in this submission.</p>	<p>Amend the rule as follows:</p> <p>15.12.2.2 Maximum building height</p> <p>a. <del>The maximum height of any building shall be in accordance with the height specified</del> <u>Unless identified on the Central City Maximum Building Height planning map the maximum height of any building shall be 32 metres.</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p><del>b. The maximum height of any building base shall be 17 metres.</del></p> <p>b. Any application arising from this rule shall not be limited or publicly notified.</p>
179.	Central City Mixed Use Zone	15.12.2.7 – Minimum setback from the boundary	Oppose	It is considered that the inserted requirements are unnecessary, and unduly constraining.	Delete PC14 amendments and retain operative plan rule.
180.	Central City Mixed Use Zone	15.12.2.9 – Minimum number of floors	Oppose	Whilst a minimum requirement of two floor levels is appropriate in the zone to increase intensity of development, the zone provides for a wide variety of uses, not all of which are appropriate in multi-storey buildings. As such single storey buildings may well be appropriate in a mixed use environment.	Delete proposed rule.
181.	Central City Mixed Use Zone	15.12.2.10 – Building Setbacks	Oppose	Requirements associated with internal setbacks between building towers is unnecessary.	Amend the rule by deleting clauses (b) and (c).

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
182.	Central City Mixed Use Zone	15.12.2.11 – Building Tower Coverage	Oppose	Considered unnecessary and would inappropriate disenable development capacity for no sound resource management purpose.	Delete the rule.
183.	Central City Mixed Use Zone	15.12.2.12 – Glazing	Oppose	Considered unnecessary and would inappropriate disenable development capacity for no sound resource management purpose	Delete the rule.
184.	Central City Mixed Use Zone (South Frame)	15.12.1.1(P13)(a)(iii)	Oppose	Delete as this matter is appropriately managed through screening and controls in Rule 15.12.2.5 'Screening'	Amend the rule by deleting clause (a)(iii).
185.	Central City Mixed Use Zone (South Frame)	15.12.1.1(P13)(d)(iii)	Oppose	Requirement is seen as excessive within this context as these areas are not necessarily mutually exclusive.	Amend the rule by deleting clause (d)(iii).
	Central City Mixed Use Zone (South Frame)	15.12.1.1(P13)(f)(g)(j)	Oppose	Increasing the extent of setbacks is not more appropriate within this context, revert to the operative Plan rule.	<ol style="list-style-type: none"> <li>1. Amend the rule by retaining the operative Plan wording for clause (f).</li> <li>2. Delete clauses (g) and (j).</li> </ol>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				Clause (j) is seen as excessive within this context as a higher density of residential activity should be encouraged, with standards for outdoor and communal living space being used.	
186.	Central City Mixed Use Zone – South Frame	15.13.1.3(RD4)	Oppose	Assessment matters for Glazing and Outdoor Space are excessive and appropriate matters are contained within Provision 15.14.2.10.	Amend the rule by deleting clauses (b) – glazing and (c) – outlook.
187.	Central City Mixed Use Zone – South Frame	15.13.1.3(RD5)	Oppose	Assessment matters for Upper floor setbacks and glazing are excessive.	Amend the rule by deleting clauses (l) – upper floor setbacks and (m) – glazing.
188.	Central City Mixed Use Zone – South Frame	15.13.2.1	Support in part	<p>The maximum height of 32m is supported as being appropriately enabling within a proximate distance to the City Centre Zone.</p> <p>The restrictions associated with is opposed as unnecessary, in conjunction with the absence of clarity in the definition associated with ‘building base’</p>	<p>Delete the rule and replace as follows:</p> <p><u>The maximum height of all buildings shall be 32m.</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				as discussed in this submission.  The provision as associated with notification is sought to be consistent with that associated with the Central City – Mixed Use zone.	Retain clause (b).
189.	Central City Mixed Use Zone – South Frame	15.13.2.4(f) 'Street scene, landscaping and trees'	Oppose	The requirement for a minimum area of tree canopy of 4m <sup>2</sup> is excessive and inappropriately, it reduces development opportunities.	Amend the rule by deleting the PC14 amendments and retaining the Operative Plan rule wording.
190.	Central City Mixed Use Zone – South Frame	15.13.2.10 – Building Tower Setbacks  15.13.2.11 – Building Tower Coverage  15.13.2.12 – Glazing	Oppose	Considered unnecessary and would reduce development capacity for no sound resource management purpose.	Delete rules 15.13.2.10 – tower setbacks, 15.13.2.11 – tower coverage, and 15.13.2.12 -glazing.
191.	Assessment Matters	15.14.3.1	Oppose	Additional assessment matters set out in clause (b) are unnecessary as the key issues are already addressed in clause (a), or are matters to be deleted	Delete clause (b), with the exception of clause (v) (subject to the below amendment):  v. <u>The individual or cumulative</u>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				as a consequential amendment in association with the submission seeking the deletion of street wall, wind, and tower rules.	<u>effects of shading, visual bulk and dominance, <del>and reflected heat from glass</del> on sites in adjoining residential zones or on the character, quality and use of public open space and in particular the Ōtākaro Avon River corridor, Earthquake Memorial, Victoria Square and Cathedral Square;</u>
192.	Assessment Matters	<p>15.14.3.35 – Upper Floor Setbacks</p> <p>15.14.3.36 – height in Central City Mixed Use Zone</p> <p>15.14.3.37 Glazing</p> <p>15.14.3.38 Outdoor Spaces</p> <p>15.14.3.39 Wind</p> <p>15.14.3.40 – Comprehensive Residential Development in the Mixed Use Zones</p> <p>15.14.5.3 City Spine Transport Corridor</p>	Oppose	Additional controls are unnecessary, subjective and overly broad. These matters are all addressed by Rule 15.14.2.6 'Urban Design'. Deletion of the assessment matters sought as a consequential amendment associated with the submission seeking the deletion of the upper floor setback rule.	<p>Delete the following assessment matters:</p> <p>15.14.3.35 – upper floor setbacks</p> <p>15.14.3.36 – height in Central City Mixed Use Zone</p> <p>15.14.3.37 Glazing</p> <p>15.14.3.38 Outdoor Spaces</p> <p>15.14.3.39 Wind</p> <p>15.14.3.40 – Comprehensive Residential Development in the Mixed Use Zones</p> <p>15.14.5.3 City Spine Transport Corridor</p>

## **Appendix 2: Metropolitan Centre Zone Rules**

The following Metropolitan Centre Zone Rules set out proposed amendments sought from Kāinga Ora to Plan Change 14, to incorporate rules to enable the classification of Hornby, Papanui and Riccarton as Metropolitan Centre Zones

Proposed changes in zoning are highlighted in dark blue.



## MCZ - Metropolitan Centre Zone

The Christchurch Metropolitan Centres are commercial centres with a focal point as sub-regional centres of Papanui, Riccarton and Hornby. They have a planned urban built environment that reflects a high density built form with high-quality public spaces. The Metropolitan Centre Zone provides for a diverse range of commercial, retail, community and recreational activities and offers a variety of employment and living opportunities.

The Metropolitan Centre Zone implements the National Policy Statement on Urban Development, by enabling a built form and density that reflects demand for housing and business use in sub-regional centres.

Activities and buildings along identified active street frontages interact with the streets and public spaces and contribute to a vibrant and attractive metropolitan centre. New buildings and development are well designed and reflect the high-quality urban environment.

Objectives
<p><b>MCZ-O1 Purpose of the Metropolitan Centre Zone</b></p> <p>The Metropolitan Centre Zone:</p> <ol style="list-style-type: none"> <li>1. Is Christchurch's secondary commercial, civic and community centres; and</li> <li>2. Accommodates a wide range of commercial, community, recreational and residential activities.</li> </ol>
<p><b>MCZ-O2 Planned urban built environment of the Metropolitan Centre Zone</b></p> <p>The planned urban built environment of the Metropolitan Centre Zone is characterised by:</p> <ol style="list-style-type: none"> <li>1. A built form that is compact and reflects the high-density environment of the Metropolitan Centre;</li> <li>2. A built environment that is versatile, well designed and of high quality and contributes to attractive and safe public spaces; and</li> <li>3. An urban environment that is an attractive place to live, work and visit.</li> </ol>
Policies
<p><b>MCZ-P1 Appropriate activities</b></p> <p>Enable activities that are compatible with the purpose of the Metropolitan Centre Zone.</p>
<p><b>MCZ-P2 Location of residential activity</b></p> <p>Enable residential activity where:</p> <ol style="list-style-type: none"> <li>1. It is located above ground floor; and</li> <li>2. It provides for an ongoing active street frontage with a positive interface with the public space.</li> </ol>
<p><b>MCZ-P3 Health and well-being for residential activity</b></p> <p>Ensure residential activity and residential units achieve a healthy urban built environment that provides for people's amenity and well-being in respect of:</p> <ol style="list-style-type: none"> <li>1. Access to sunlight, daylight and outdoor living space; and</li> <li>2. Privacy and site design.</li> </ol>

<p><b>MCZ-P4 Other activities</b></p> <p>Provide for other activities within the Metropolitan Centre Zone where:</p> <ol style="list-style-type: none"> <li>1. Any significant adverse effects, can be avoided, remedied or mitigated; and</li> <li>2. The activity is consistent with the planned urban built environment and purpose of the zone.</li> </ol>
<p><b>MCZ-P5 Inappropriate activities</b></p> <p>Avoid activities that are incompatible with the purpose of the Metropolitan Centre Zone.</p>
<p><b>MCZ-P6 Small scale built development</b></p> <p>Enable repairs, alterations and additions to existing buildings and structures, and the erection of smaller-scale buildings and structures, that achieve the planned urban built environment for the Metropolitan Centre Zone.</p>
<p><b>MCZ-P7 Larger scale built development</b></p> <p>Provide for high-density development that achieves a quality built form, taking into consideration the following design objectives and the planned urban built environment of the zone.</p> <ol style="list-style-type: none"> <li>1. Buildings are well-designed and contribute to a high-quality vibrant public realm through visual interest and aesthetic coherence achieved through façade design, materials, and active edges;</li> <li>2. Buildings abut the street edge and define and enclose the streets, and define the edges of open space;</li> <li>3. Street corners are legible and enhanced through architectural treatment and form and maximised activity;</li> <li>4. Pedestrian amenity is maximised through good permeability and activation, which contributes to safety and walkability;</li> <li>5. Servicing and parking are subservient to the built form to maximise an attractive and active pedestrian interface at the street edge;</li> <li>6. Servicing plant is integrated within the architectural design, to avoid an ‘add on’ appearance and ensure a well-designed top to buildings;</li> <li>7. Residential activity is provided with a high quality living environment, including access to privacy, outlook, and sun access;</li> <li>8. Development responds to the positive contextual elements (existing and potential) including neighbouring buildings, elements such as trees and crossing points in the street</li> </ol>
<p><b>MCZ-P8 Public space interface</b></p> <p>Where located along an active street frontage identified on the planning maps, require development to provide a positive interface with the public space through:</p> <ol style="list-style-type: none"> <li>1. Buildings that are built up to the front boundary of the site;</li> <li>2. Continuous active street frontages;</li> <li>3. Verandas or other forms of pedestrian shelter;</li> <li>4. Transparent glazing on the ground floor that allows visibility into and out of commercial frontages and reflects whether it is a primary or secondary frontage;</li> <li>5. Obvious and highlighted public entrances; and</li> <li>6. Visually unobtrusive parking, storage and servicing areas, preferably within or to the rear of the building.</li> </ol>
<p><b>MCZ-P9 Car parking and parking lots</b></p> <p>Only allow for ground level car parking and parking lots where:</p> <ol style="list-style-type: none"> <li>1. It is not located along a primary frontage identified on the planning maps; and</li> </ol>

2. Any adverse effects on the amenity and quality of the streetscape and public open spaces can be minimised.

Rules	
	<p><b>MCZ-R1      New buildings and structures, and alterations, repairs and additions to existing buildings and structures</b></p> <p>1. Activity status: <b>Permitted</b></p> <p>Where:</p> <ul style="list-style-type: none"> <li>a. The gross floor area of the new building, structure or addition to an existing building or structure is no more than 450m<sup>2</sup>; and</li> <li>b. Compliance is achieved with: <ul style="list-style-type: none"> <li>i. MCZ-S1;</li> <li>ii. MCZ-S2;</li> <li>iii. MCZ-S4; and</li> <li>iv. MCZ-S5.</li> </ul> </li> </ul> <p>Except that:  MCZ-S1, MCZ-S4 and MCZ-S5 do not apply to alterations and repairs to existing buildings and structures.</p>
	<p>2. Activity status: <b>Restricted discretionary</b></p> <p>Where:</p> <ul style="list-style-type: none"> <li>a. Compliance is not achieved with MCZ-R1-1.a.</li> </ul> <p>Matters of discretion are restricted to:</p> <ul style="list-style-type: none"> <li>1. The matters in MCZ-P7.</li> </ul> <p>Notification:</p> <p>An application under this rule is precluded from being publicly and limited notified in accordance with sections 95A and 95B of the RMA.</p>
	<p>3. Activity status: <b>Restricted discretionary</b></p> <p>Where:</p> <ul style="list-style-type: none"> <li>a. Compliance is not achieved with MCZ-R1-1.b.</li> </ul> <p>Matters of discretion are restricted to:</p> <ul style="list-style-type: none"> <li>1. The matters of discretion of the infringed standard.</li> </ul> <p>Notification:</p> <p>An application under this rule where compliance is not achieved with MCZ-S2, MCZ-S3, MCZ-S4, or MCZ-S5 is precluded from being publicly</p>

	notified in accordance with section 95A of the RMA.
<b>MCZ-R2</b>	<b>Construction activity</b> 1. Activity status: <b>Permitted</b>
<b>MCZ-R3</b>	<b>Retail activity</b> 1. Activity status: <b>Permitted</b>
<b>MCZ-R4</b>	<b>Commercial service activity</b> 1. Activity status: <b>Permitted</b>
<b>MCZ-R5</b>	<b>Office</b> 1. Activity status: <b>Permitted</b>
<b>MCZ-R6</b>	<b>Entertainment activity</b> 1. Activity status: <b>Permitted</b>
<b>MCZ-R7</b>	<b>Recreation activity</b> 1. Activity status: <b>Permitted</b>
<b>MCZ-R8</b>	<b>Gymnasium</b> 1. Activity status: <b>Permitted</b>
<b>MCZ-R9</b>	<b>Food and beverage outlet</b> 1. Activity status: <b>Permitted</b>
<b>MCZ-R10</b>	<b>Healthcare activity</b> 1. Activity status: <b>Permitted</b>
<b>MCZ-R11</b>	<b>Educational facility</b> 1. Activity status: <b>Permitted</b>
<b>MCZ-R12</b>	<b>Community facility</b> 1. Activity status: <b>Permitted</b>
<b>MCZ-R13</b>	<b>Visitor accommodation</b> 1. Activity status: <b>Permitted</b>
<b>MCZ-R14</b>	<b>Residential activity including Papakāinga/Kāinga Nohoanga</b> 1. Activity status: <b>Permitted</b> Where: a. Compliance is achieved with: i. MCZ-S3.
	2. Activity status: <b>Restricted discretionary</b>

	<p>Where:</p> <p>a. Compliance is not achieved with MCZ-S3.</p> <p>Matters of discretion are restricted to</p> <p>1. The matters of discretion of the infringed standard.</p> <p><b>Notification:</b></p> <p>An application under this rule is precluded from being publicly notified in accordance with section 95A of the RMA.</p>
	<p><b>MCZ-R15 Social Housing Complex</b></p> <p>1. Activity status: <b>Permitted</b></p>
	<p><b>MCZ-R16 Community corrections activities</b></p> <p>1. Activity status: <b>Permitted</b></p>
	<p><b>MCZ-R17 Conservation activity</b></p> <p>1. Activity status: <b>Permitted</b></p>
	<p><b>MCZ-R18 Customary harvesting</b></p> <p>1. Activity status: <b>Permitted</b></p>
	<p><b>MCZ-R19 Large format retail activity</b></p> <p>1. Activity status: <b>Permitted</b></p>
	<p><b>MCZ-R20 Supermarket</b></p> <p>1. Activity status: <b>Permitted</b></p>
	<p><b>MCZ-R21 Emergency service facility</b></p> <p>1. Activity status: <b>Restricted discretionary</b></p> <p>Matters of discretion are restricted to:</p> <p>1. The matters in MCZ-P4.</p> <p>Notification:</p> <p>An application under this rule is precluded from being publicly notified in accordance with section 95A of the RMA.</p>
	<p><b>MCZ-R22 Retirement village</b></p> <p>1. Activity status: <b>Restricted discretionary</b></p> <p>Matters of discretion are restricted to:</p> <p>1. The matters in MCZ-P4.</p>
	<p><b>MCZ-R23 Parking lot</b></p> <p>1. Activity status: <b>Restricted discretionary</b></p>

	<p>Matters of discretion are restricted to:</p> <ol style="list-style-type: none"> <li>1. The matters in MCZ-P9.</li> </ol> <p><b>Notification:</b>  An application under this rule is precluded from being publicly notified in accordance with section 95A of the RMA</p>
	<p><b>MCZ-R24 Trade supplier</b></p> <ol style="list-style-type: none"> <li>1. Activity status: <b>Discretionary</b></li> </ol>
	<p><b>MCZ-R25 Drive-through services</b></p> <ol style="list-style-type: none"> <li>1. Activity status: <b>Permitted</b></li> </ol>
	<p><b>MCZ-R26 Any activity not otherwise listed as permitted, restricted discretionary, discretionary or non-complying</b></p> <ol style="list-style-type: none"> <li>1. Activity status: <b>Discretionary</b></li> </ol>
	<p><b>MCZ-R27 Industrial activity</b></p> <ol style="list-style-type: none"> <li>1. Activity status: <b>Non-complying</b></li> </ol>
	<p><b>MCZ-R28 Primary production</b></p> <ol style="list-style-type: none"> <li>1. Activity status: <b>Non-complying</b></li> </ol>
	<p><b>MCZ-R29 Rural activities other than primary production</b></p> <ol style="list-style-type: none"> <li>1. Activity status: <b>Non-complying</b></li> </ol>

Standards	
<b>MCZ-S1 Height</b>	
<ol style="list-style-type: none"> <li>1. All buildings and structures must not exceed a maximum height above ground level of 53m.</li> </ol>	<p>Matters of discretion are restricted to:</p> <ol style="list-style-type: none"> <li>1. The location, design and appearance of the building or structure;</li> <li>2. Loss of sunlight to adjacent public space;</li> <li>3. Shading to surrounding buildings;</li> <li>4. Shading and loss of privacy for any adjacent residential activity;</li> <li>5. Wind effects on the safety and amenity of the adjacent public space;</li> <li>6. The planned urban built environment; and</li> <li>7. Whether an increase in building height results from a response to natural hazard mitigation.</li> </ol>
<b>MCZ-S2 Active street frontages</b>	
<ol style="list-style-type: none"> <li>1. Along building lines identified on the planning maps all buildings must be built up to and oriented towards the identified building line and provide a veranda that:</li> </ol>	<p>Matters of discretion are restricted to:</p> <ol style="list-style-type: none"> <li>1. Whether the building promotes a positive interface with the street, community safety and visual interest;</li> <li>2. Whether the building incorporates landscaping or other means to provide</li> </ol>

<ul style="list-style-type: none"> <li>a. Extends along the entire length of the building frontage;</li> <li>b. Provides continuous shelter with any adjoining veranda; and</li> <li>c. Has a minimum setback of 500mm from any kerb face.</li> </ul> <p>2. For sites with primary street frontage controls identified in the planning maps:</p> <ul style="list-style-type: none"> <li>a. At least 55% of the ground floor building frontage must be display windows or transparent glazing; and</li> <li>b. The principal public entrance to the building must be located on the front boundary.</li> </ul> <p>3. For sites with secondary street frontage controls identified in the planning maps at least 35% of the ground floor building frontage must be display windows or transparent glazing.</p>	<p>increased amenity, shade and weather protection; and</p> <p>3. Whether topographical or other site constraints make compliance with the standard impractical.</p>
<b>MCZ-S3      Location of residential units</b>	
<p>1. All residential units must be located above ground floor.</p>	<p>Matters of discretion are restricted to:</p> <ul style="list-style-type: none"> <li>1. The amenity and quality of the streetscape;</li> <li>2. Whether the location of the residential units promote on the an active frontage, community safety and visual interest at the pedestrian level; and</li> <li>3. Whether the design could facilitate conversion to commercial use so as not to foreclose future options.</li> </ul>
<b>MCZ-S4      Location of parking</b>	
<p>1. Any on-site ground level car parking must be located within or at the rear of the building that it serves.</p>	<p>Matters of discretion are restricted to:</p> <ul style="list-style-type: none"> <li>1. The amenity and quality of the streetscape.</li> </ul>



<b>MCZ-S5      Service areas and outdoor storage</b>	
<p>1. Any on-site service area, including rubbish collection areas, and area for the outdoor storage of goods or materials must:</p> <p>a. Be located to the rear of the building; and</p> <p>b. Without preventing the provision of a gate or entry point to the site, be fully screened by a 1.8m high fence or landscaping where it is visible from the road or any other public space.</p>	<p>Matters of discretion are restricted to:</p> <p>1. The amenity and quality of the streetscape or public space; and</p> <p>2. The service and storage needs of the activity.</p>

### **Appendix 3: Maps**

The following maps set out the height amendments sought from Kāinga Ora to Plan Change 14.

Noting that changes to the Residential Suburban and Residential Transition Zone and including the Lyttleton Port Residential Zone has not been shown here.



10931

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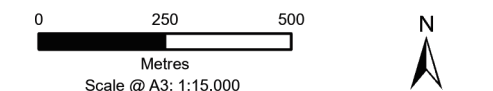
Plan Change 14

Kāinga Ora Submission

Papanui & Merivale

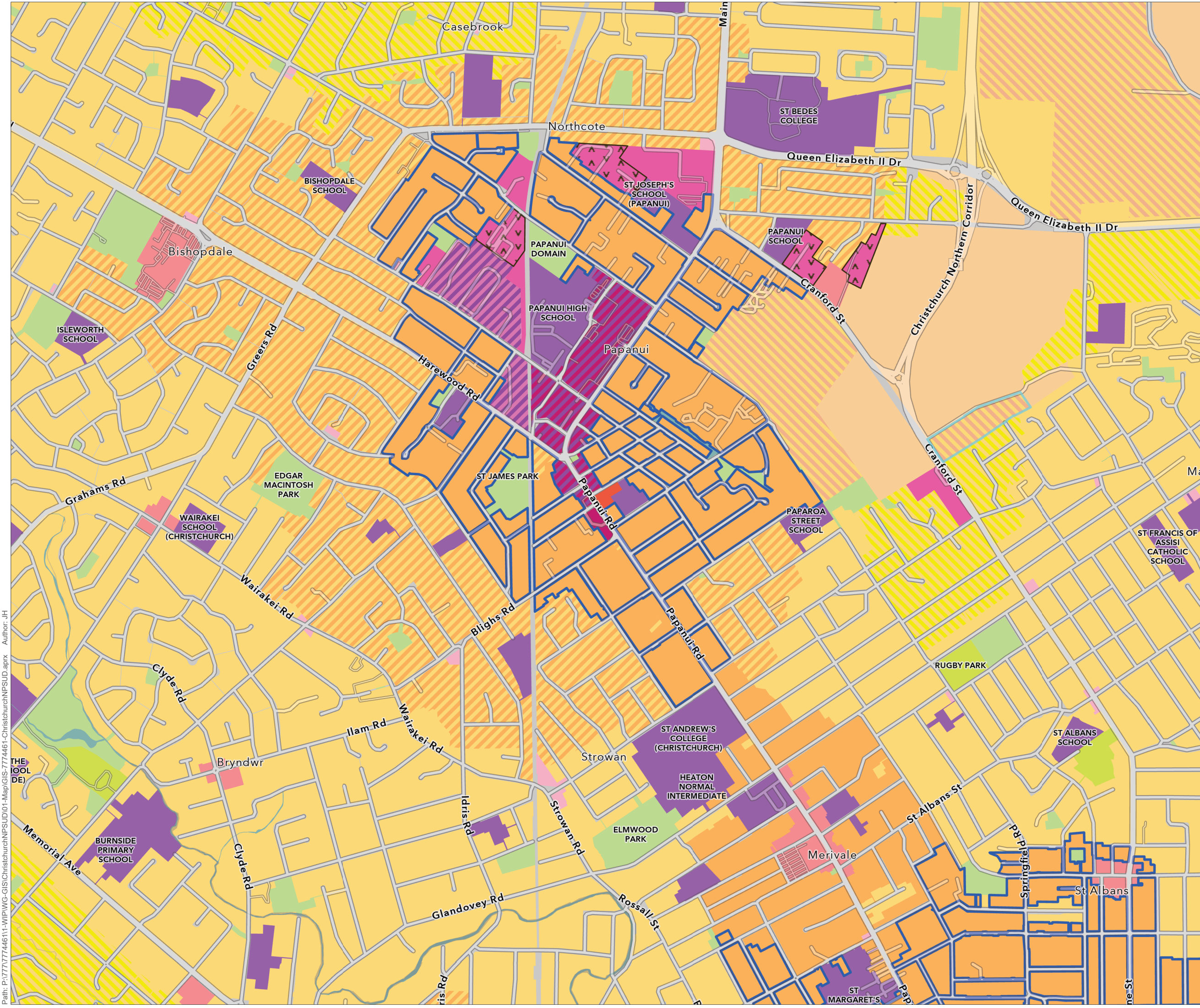
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- Height Variation Control - 36m
- Kāinga Ora Proposed Zoning
- Metropolitan Centre Zone
- High density residential zone
- Medium density residential zone
- PC14 Zoning
- Future Urban Zone
- High density residential zone
- Large format retail zone
- Local centre zone
- Medium density residential zone
- Neighbourhood centre zone
- Town centre zone
- Transport
- Specific Purpose
- Industrial General
- Rural Urban Fringe
- Residential Guest Accommodation
- Residential Medium Density
- Residential Suburban
- Residential Suburban Density Transition
- Open Space Community Parks
- Open Space Metropolitan Facilities
- Open Space Natural
- Open Space Water and Margins
- Residential New Neighbourhood
- Precinct
- Brownfield Precinct

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Revision	1.0
Status	FINAL
Author	JH
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Project	Christchurch City Council PC14 Submissions
Client	Kāinga Ora
Discipline	GIS
Drawing No.	GIS-7774461-CCCPC14-01



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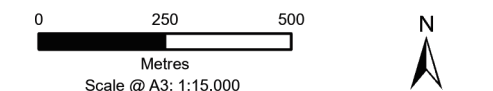
Plan Change 14

Kāinga Ora Submission

Hornby

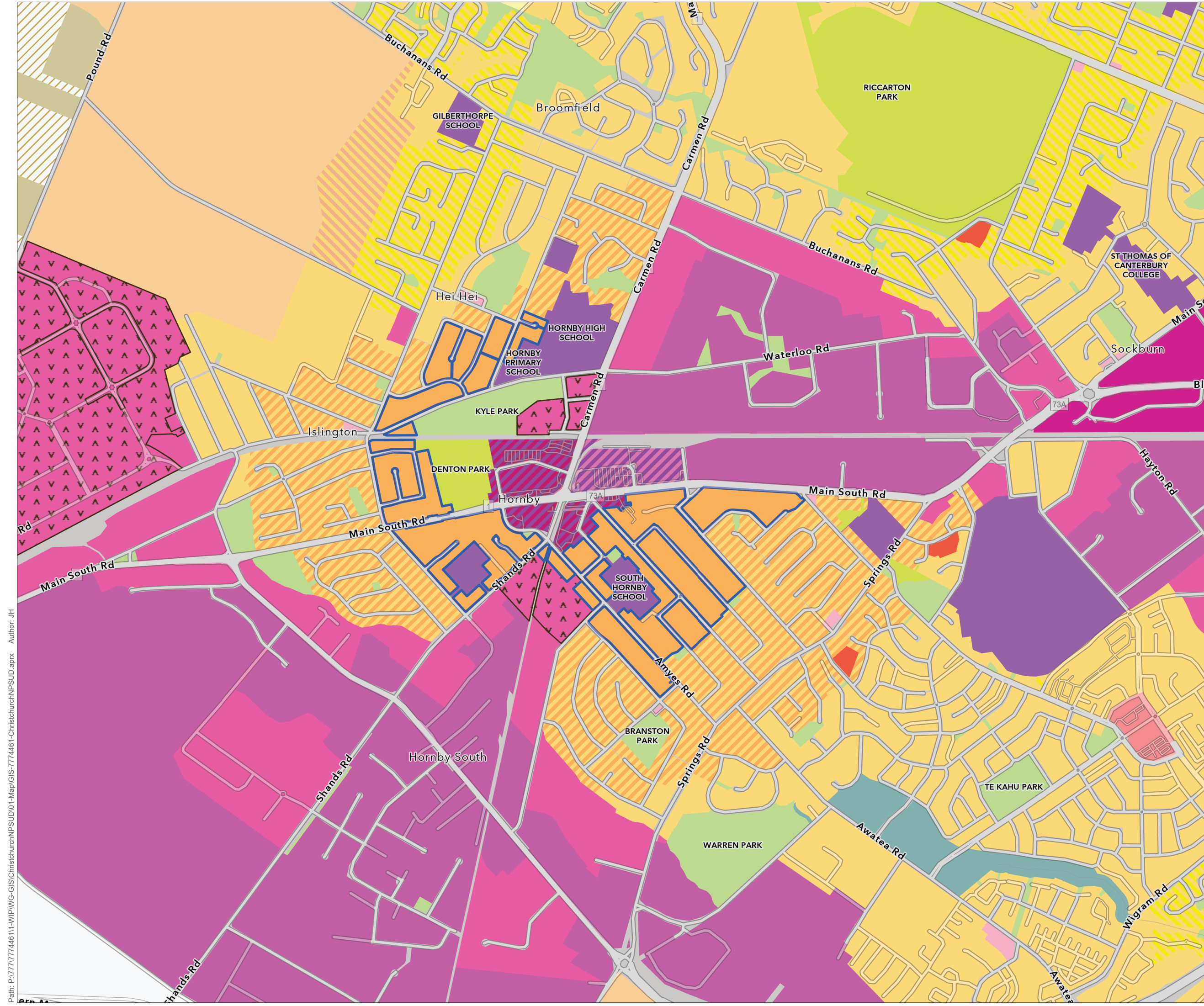
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- Metropolitan Centre Zone
- High density residential zone
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- PC14 Zoning
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- High density residential zone
- Large format retail zone
- Local centre zone
- Medium density residential zone
- Mixed use zone
- Neighbourhood centre zone
- Town centre zone
- Transport
- Specific Purpose
- Industrial General
- Industrial Heavy
- Industrial Park
- Rural Quarry
- Rural Quarry or Open Space Community Parks (Templeton)
- Rural Urban Fringe
- Residential Guest Accommodation
- Residential Suburban
- Residential Suburban Density Transition
- Open Space Community Parks
- Open Space Metropolitan Facilities
- Open Space Water and Margins
- Residential New Neighbourhood
- Precinct
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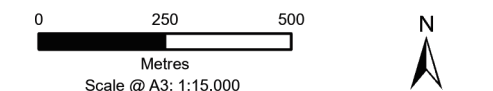
Plan Change 14

Kāinga Ora Submission

City Centre

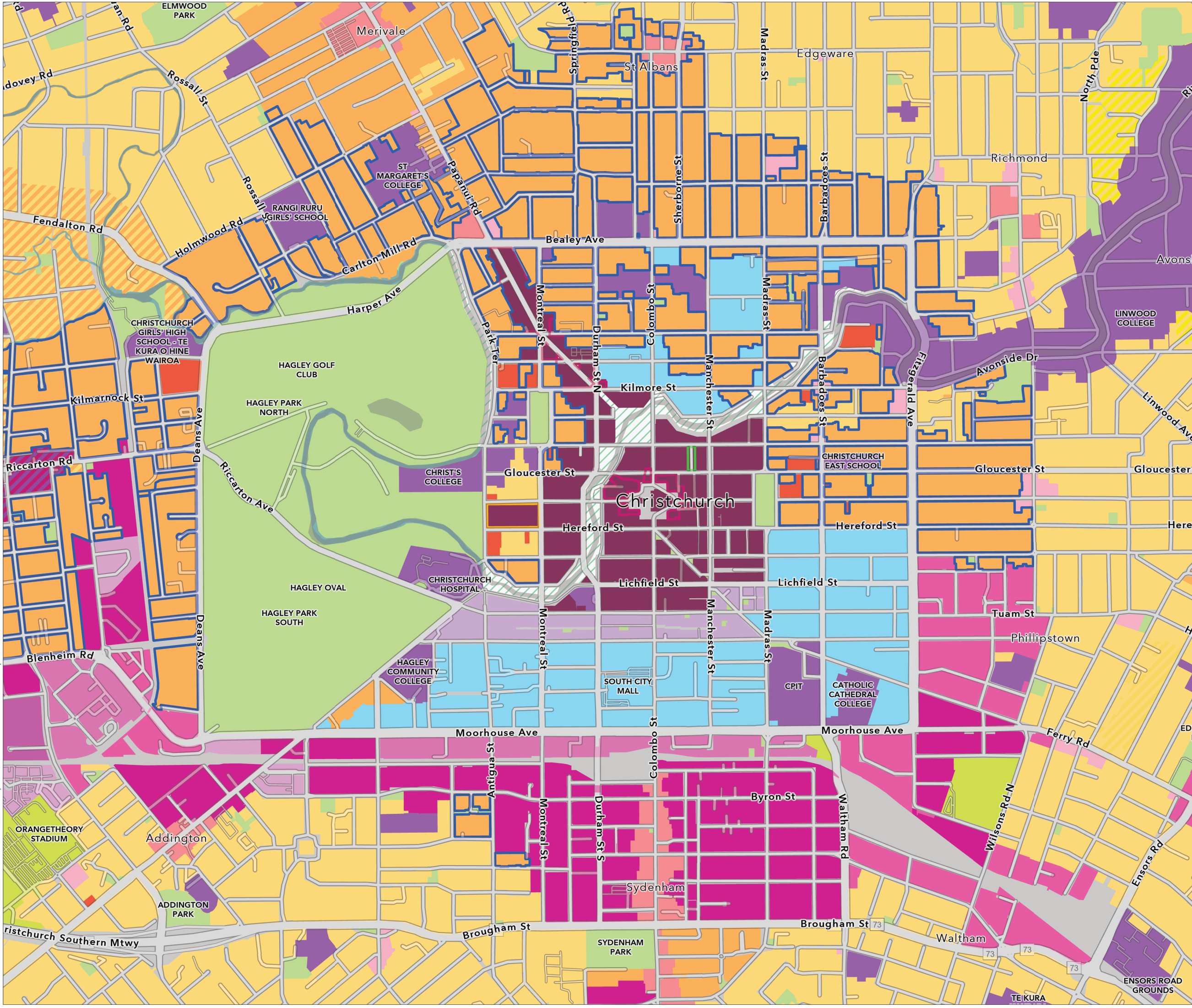
- Kāinga Ora Proposed HVC
- Height Variation Control - 36m
- Kāinga Ora Proposed Zoning
- Metropolitan Centre Zone
- High density residential zone
- Medium density residential zone
- PC14 Zoning
- Central City Mixed Use Zone
- Central City Mixed Use Zone (South Frame)
- City centre zone
- High density residential zone
- Large format retail zone
- Local centre zone
- Medium density residential zone
- Mixed use zone
- Neighbourhood centre zone
- Town centre zone
- Transport
- Specific Purpose
- Industrial General
- Industrial Heavy
- Residential Guest Accommodation
- Residential Medium Density
- Residential Suburban
- Residential Suburban Density Transition
- Open Space Community Parks
- Open Space Metropolitan Facilities
- Open Space Water and Margins
- Commercial Office
- Avon River Precinct (Te Papa Otakaro)
- Commercial Retail Park
- Precinct
- Art Centre Height Precinct
- Cathedral Square and Victoria Street Precinct
- New Regent Street Height Precinct

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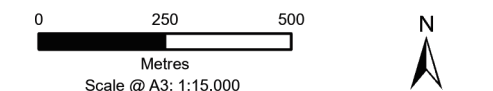
Plan Change 14

Kāinga Ora Submission

Riccarton

- Kāinga Ora Proposed HVC
- Height Variation Control - 36m
- Kāinga Ora Proposed Zoning
- Metropolitan Centre Zone
- High density residential zone
- Medium density residential zone
- PC14 Zoning
- Central City Mixed Use Zone
- High density residential zone
- Large format retail zone
- Local centre zone
- Medium density residential zone
- Mixed use zone
- Neighbourhood centre zone
- Town centre zone
- Transport
- Specific Purpose
- Industrial General
- Industrial Heavy
- Residential Guest Accommodation
- Residential Medium Density
- Residential Suburban
- Residential Suburban Density Transition
- Open Space Community Parks
- Open Space Metropolitan Facilities
- Open Space Natural
- Open Space Water and Margins
- Commercial Office

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File
KaingaOra_CCCPC14Submission_PapanuiMerivale
20230512 Kainga Ora - ChChDP PC 13 submission vSIGNED





12<sup>th</sup> May 2023

Attn: Mark Stevenson  
Planning Manager  
Christchurch City Council  
Po Box 73016  
Christchurch

*Submission lodged via email: [engagement@ccc.govt.nz](mailto:engagement@ccc.govt.nz)*

**KĀINGA ORA – HOMES AND COMMUNITIES SUBMISSION ON A NOTIFIED  
PROPOSAL FOR PLAN CHANGE 13 UNDER CLAUSE 6 OF SCHEDULE 1 OF THE  
RESOURCE MANAGEMENT ACT 1991**

**This is a submission on Plan Change 13 – Heritage (“PC13”) from Christchurch City Council (“the Council” on the Operative Christchurch District Plan (“the Plan”).**

Kāinga Ora does not consider it can gain an advantage in trade competition through this submission. In any event, Kāinga Ora is directly affected by an effect of the subject matter of the submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

**The specific provisions of the proposal that this submission relates to:**

The proposed Residential Heritage Area provisions in their entirety.

**The Kāinga Ora submission is:**

1. Kāinga Ora Homes and Communities (“**Kāinga Ora**”) is a Crown Entity and is required to give effect to Government policies. Kāinga Ora has a statutory objective that requires it to contribute to sustainable, inclusive, and thriving communities that:

- a) Provide people with good quality, affordable housing choices that meet diverse needs; and
  - b) Support good access to jobs, amenities and services; and
  - c) Otherwise sustain or enhance the overall economic, social, environmental and cultural well-being of current and future generations.
2. Because of these statutory objectives, Kāinga Ora has interests beyond its role as a public housing provider. This includes a role as a landowner and developer of residential housing and as an enabler of quality urban developments through increasing the availability of build-ready land across Christchurch City.
3. Kāinga Ora therefore has an interest in PC13 and how it:
  - (a) Gives effect to the National Policy Statement on Urban Development (“**NPS-UD**”) and The Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (“**the Housing Supply Act**”);
  - (b) Minimises barriers that constrain the ability to deliver housing development across public housing, affordable housing, affordable rental, and market housing; and
  - (c) Provides for the provision of services and infrastructure and how this may impact on the existing and planned communities, including Kāinga Ora housing developments.
4. By way of review, Kāinga Ora considers that having some of the Residential Heritage Area provisions being contained in PC14 and following an IPI process i.e. the built form standards, and other Heritage Area provisions being progressed through a separate PC13, and following a first schedule process i.e. Heritage Area policies has created efficiency issues. The Kāinga Ora submission on Residential Heritage Areas as part of PC13 therefore needs to be read together with our separate submission on PC14.
5. The Kāinga Ora submission supports the following parts of PC13:
  - a) The management of historic heritage and the use of qualifying matters for individually listed heritage items, including the identified sites of historic heritage items and their settings (City Centre Zone) – noting that historic heritage is a matter of national significance in Section 6.
6. The Kāinga Ora submission opposes in part PC13 for the following reasons:

- a) Kāinga Ora generally supports the protection of areas of historic heritage where the requirements of Section 6 of the Resource Management Act 1991 ('RMA' or 'the Act') are met. However, Kāinga Ora opposes the proposed Residential Heritage Areas ('RHAs') and the Residential Heritage Area Interface overlay ('RHAIO') that are sought to be introduced under PC13 in their entirety. Kāinga Ora does not consider that the proposed RHAs and RHAIOs meet the requirements of Section 6 of RMA to the extent that they should be accorded 'historic heritage' status of 'national' significance.
- b) Kāinga Ora seeks the deletion of any proposals in PC14 that seek amendments as matters pertain to RHAs and RHAIOs, consistent with the relief sought in this PC13 submission. Kāinga Ora considers that the proposed changes across PC13 and PC14 are not qualifying matters, as the assessments in its view, do not meet the requirements under s6, s77I, s77J, s77K, and/or s77L of the RMA.
- c) The RHAs and RHAIOs lack a strong evidence basis and fail to consider unimplemented resource consents.
- d) Kāinga Ora also opposes the proposed RHAs and RHAIOs as being a qualifying matter as proposed in PC14 as we consider the Council has sought to elevate (conflate) special character as historic heritage. Kāinga Ora, therefore oppose the PC13 provisions, contained in section 9.3.6.4 and the associated Schedule B in 9.3.7.3.
- e) Kāinga Ora has particular concern regarding the assessment of areas with a high proportion of Kāinga Ora housing, such as the proposed Piko/Shands character and heritage areas. For example, the benefits of providing a greater number of houses for the most vulnerable members of society, particularly in an area that has historically been used for social housing, are greater than retaining the character associated with existing housing. Consideration should be given if protection does sufficiently outweigh the social cost of the provision warm, dry and safe housing. We do not believe this test has been met.
- f) While State Housing delivery throughout the first Labour Government period is a feature of New Zealand's past, the very nature of state 'public housing' was and remains at its core, to provide housing for those in need. Much of the existing housing stock throughout Christchurch is nearing the end of its serviceable life and located on low-density residential zoned land which does not reflect the significant increase

in New Zealand's population since their original construction, and the relative increase and demand for public housing in the current environment. Securing such areas or groupings of houses (and in some instances identification as 'built heritage') effectively-ascribes heritage value to past urban development patterns that are demonstrably not an efficient use of land, and present a significant loss of opportunity cost for public housing delivery – particularly where the Medium Density Residential Standards ('MDRS') or High Density Residential Zoning ('HDZ') would enable an uplift in housing intensity as a permitted activity.

- g) Kāinga Ora consider that the assessments supporting the identification of RHAs and RHAIOs predominantly focus on physical built form, and do not have sufficient consideration of historical values associated with the place.
- h) Kāinga Ora also oppose the proposed provisions controlling new buildings on sites sharing a boundary with a Residential Heritage Area (Residential Heritage Area Interface). The introduction of this interface further blurs the distinction between s6 RMA matters. These controls are similarly not a universally accepted approach to the management and protection of heritage values, and Kāinga Ora does not support this use.
- i) Kāinga Ora considers that qualifying matters need to be expressed more clearly across PC13 and PC14 to assist with plan administration and interpretation. For example, having some of the Heritage Area provisions being contained in PC14 and following an IPI process i.e. the built form standards, and other Heritage Area provisions being progressed through a separate PC13, and following a first schedule process i.e. Heritage Area policies has created efficiency issues.
- j) Kāinga Ora submits that changes to policies, rules and matters of discretion are necessary to better reflect the requirements and intent of the 'the Housing Supply Act' and NPS-UD. Kāinga Ora considers that PC 13 and PC14 are not currently appropriately framed to recognise that as the character of planned urban areas evolves to deliver a more intensive and compact urban form, amenity values will change. Amendments are sought through both this submission and the submission on PC14 to ensure this is reflected more consistently throughout the provisions, in language that is consistent with the NPS-UD.
- k) The submission seeks such further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission above.

7. The changes requested are made to:
- a) Ensure that Kāinga Ora can carry out its statutory obligations;
  - b) Ensures that the proposed provisions are the most appropriate way to achieve the purpose of the Resource Management Act 1991;
  - c) Reduce interpretation and processing complications for decision makers so as to provide for plan enabled development;
  - d) Provide clarity for all plan users; and
  - e) Allow Kāinga Ora to fulfil its urban development functions as required under the Kāinga Ora–Homes and Communities Act 2019.

**Kāinga Ora seeks the following decision from Christchurch City Council:**

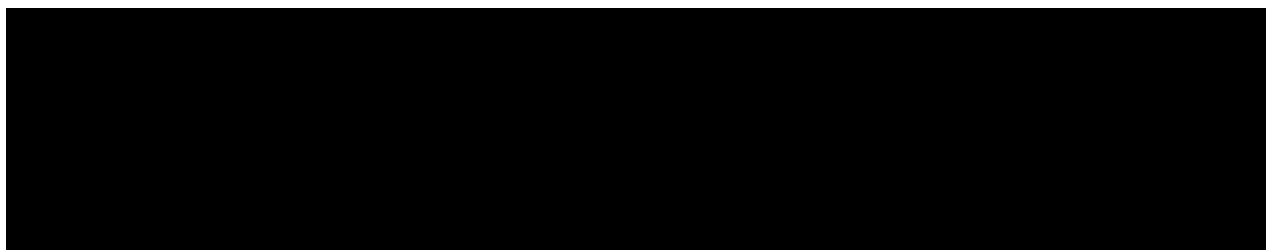
That the specific amendments, additions or retentions which are sought as specifically outlined in this submission letter, are accepted and adopted into PC13 and PC14. Including such further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.

**Kāinga Ora wishes to be heard in support of their submission.**

Kāinga Ora seeks to work collaboratively with the Council and wishes to discuss its submission on PC13 to address the matters raised in its submission.



**Brendon Liggett**  
**Development Planning Manager**  
**Kāinga Ora – Homes and Communities**





10931

Christchurch City Council

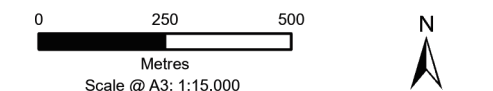
Plan Change 14

Kāinga Ora Submission

Papanui & Merivale

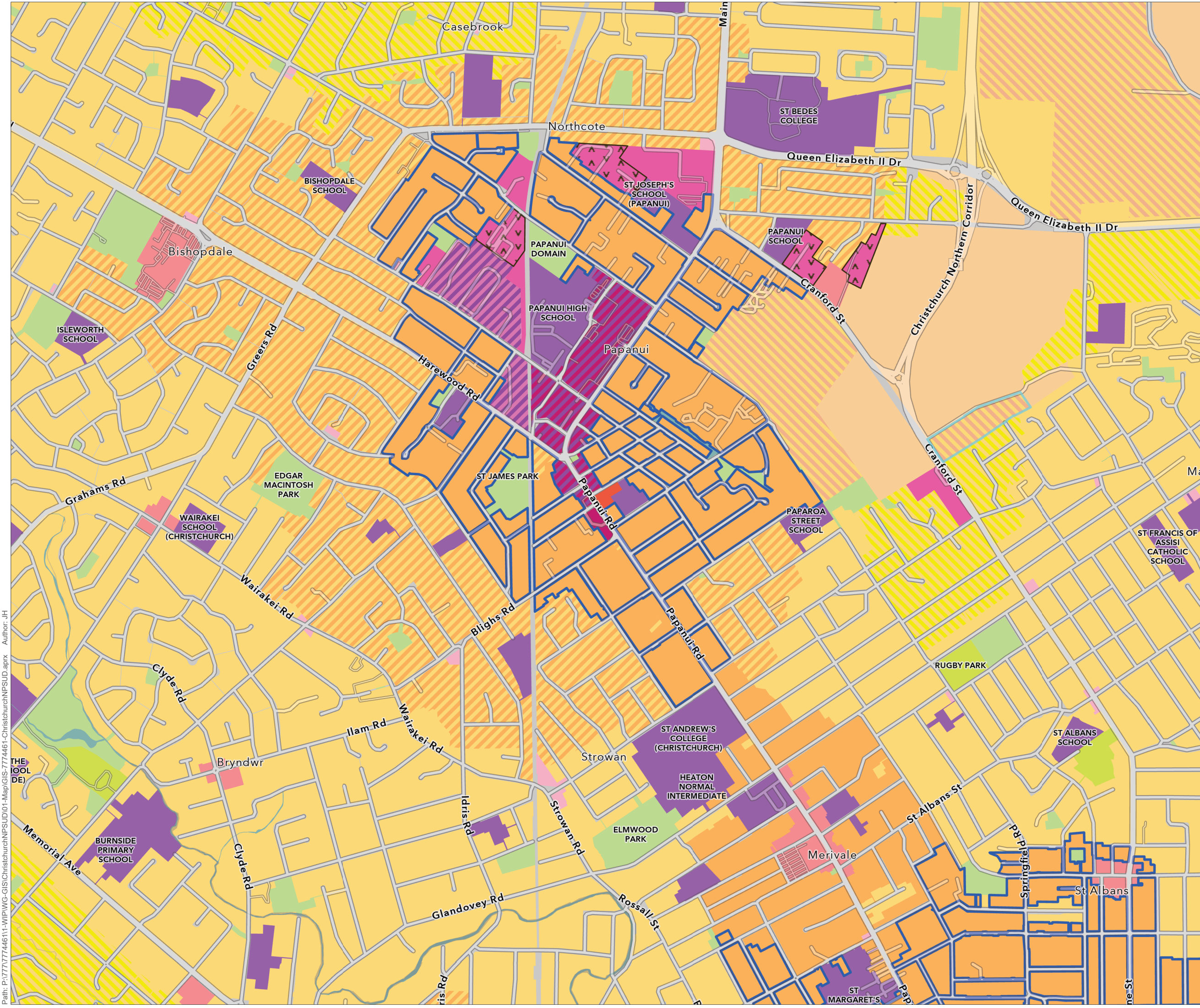
- Kāinga Ora Proposed HVC
- Height Variation Control - 36m
- Kāinga Ora Proposed Zoning
- Metropolitan Centre Zone
- High density residential zone
- Medium density residential zone
- PC14 Zoning
- Future Urban Zone
- High density residential zone
- Large format retail zone
- Local centre zone
- Medium density residential zone
- Neighbourhood centre zone
- Town centre zone
- Transport
- Specific Purpose
- Industrial General
- Rural Urban Fringe
- Residential Guest Accommodation
- Residential Medium Density
- Residential Suburban
- Residential Suburban Density Transition
- Open Space Community Parks
- Open Space Metropolitan Facilities
- Open Space Natural
- Open Space Water and Margins
- Residential New Neighbourhood
- Precinct
- Brownfield Precinct

This map contains data derived in part or wholly from sources other than Kāinga Ora, and therefore, no representations or warranties are made by Kāinga Ora as to the accuracy or completeness of this information. Contains information sourced from Hastings District Council, Hawkes Bay Regional Council, LINZ, Stats NZ, Esri, HERE, Garmin, Foursquare, METI/NASA, USGS. Map intended for distribution as an A3 PDF document.



Revision	1.0
Status	FINAL
Author	JH
Verifier	LB
Date	12/05/2023

Project	Christchurch City Council PC14 Submissions
Client	Kāinga Ora
Discipline	GIS
Drawing No.	GIS-7774461-CCCPC14-01



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10931

Christchurch City Council

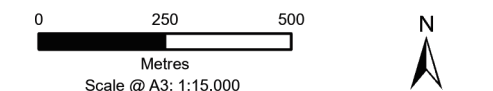
Plan Change 14

Kāinga Ora Submission

City Centre

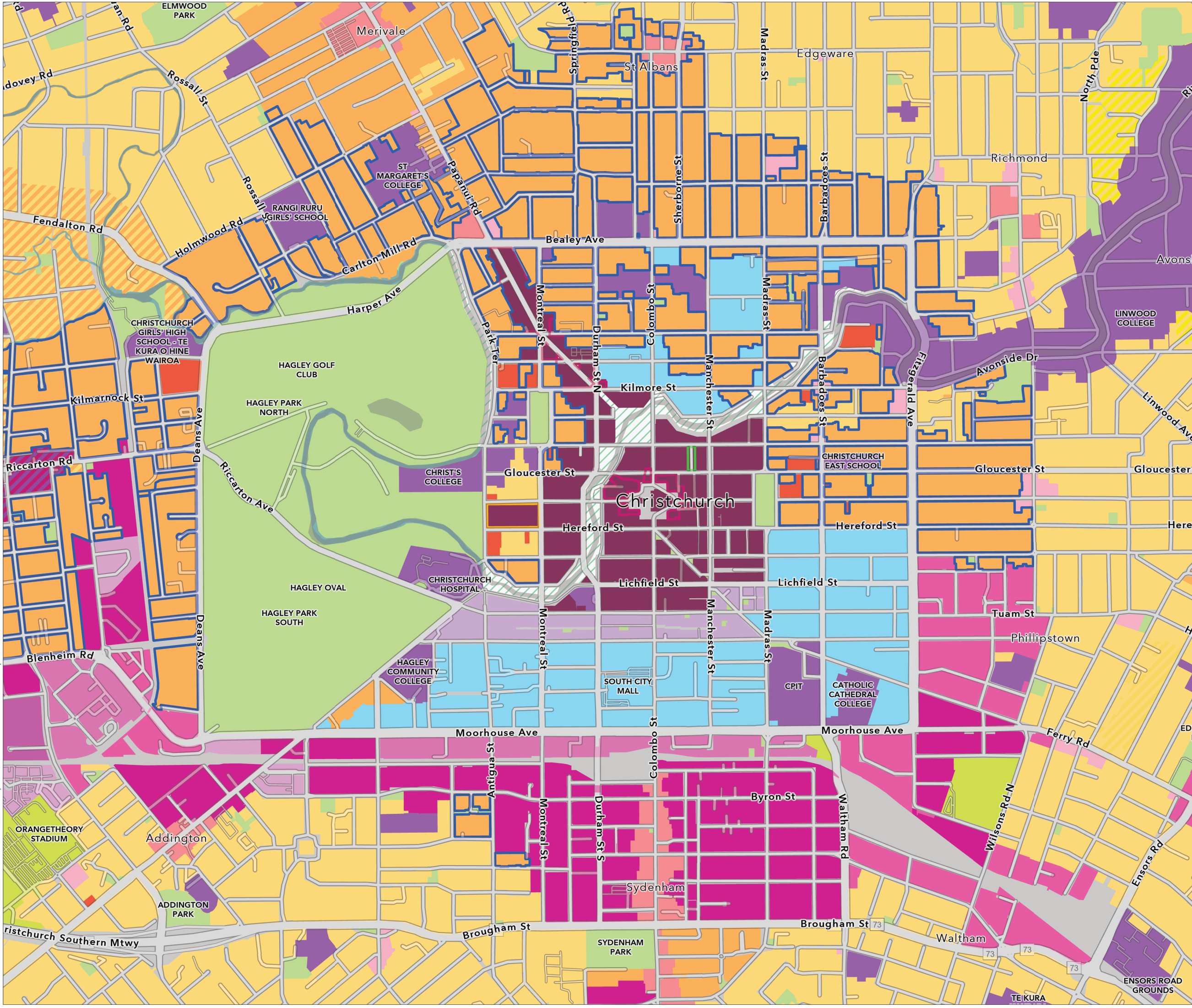
- Kāinga Ora Proposed HVC
- Height Variation Control - 36m
- Kāinga Ora Proposed Zoning
- Metropolitan Centre Zone
- High density residential zone
- Medium density residential zone
- PC14 Zoning
- Central City Mixed Use Zone
- Central City Mixed Use Zone (South Frame)
- City centre zone
- High density residential zone
- Large format retail zone
- Local centre zone
- Medium density residential zone
- Mixed use zone
- Neighbourhood centre zone
- Town centre zone
- Transport
- Specific Purpose
- Industrial General
- Industrial Heavy
- Residential Guest Accommodation
- Residential Medium Density
- Residential Suburban
- Residential Suburban Density Transition
- Open Space Community Parks
- Open Space Metropolitan Facilities
- Open Space Water and Margins
- Commercial Office
- Avon River Precinct (Te Papa Otakaro)
- Commercial Retail Park
- Precinct
- Art Centre Height Precinct
- Cathedral Square and Victoria Street Precinct
- New Regent Street Height Precinct

This map contains data derived in part or wholly from sources other than Kāinga Ora, and therefore, no representations or warranties are made by Kāinga Ora as to the accuracy or completeness of this information. Contains information sourced from Hastings District Council, Hawkes Bay Regional Council, LINZ, Stats NZ, Esri, HERE, Garmin, Foursquare, METI/NASA, USGS. Map intended for distribution as an A3 PDF document.



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Author	JH
Verifier	LB
Date	12/05/2023

Project	Christchurch City Council PC14 Submissions
Client	Kāinga Ora
Discipline	GIS
Drawing No.	GIS-7774461-CCCPC14-02



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**Robson, Gina**

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**From:** Lezel Beneke <lezel.beneke@kaingaora.govt.nz>  
**Sent:** Friday, 12 May 2023 8:53 pm  
**To:** Engagement  
**Cc:** developmentplanning  
**Subject:** RE: Kainga Ora Submission on Plan Change 14 of the Operative Christchurch District Plan  
**Attachments:** KaingaOra\_CCCPC14Submission\_PapanuiMerivale.pdf;  
 KaingaOra\_CCCPC14Submission\_CityCentre.pdf

## Appendix 3 – Maps of HRZ and Height Variation Control – Maps Papanui and City Centre

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**From:** Lezel Beneke  
**Sent:** Friday, 12 May 2023 8:52 PM  
**To:** 'engagement@ccc.govt.nz' <engagement@ccc.govt.nz>  
**Cc:** developmentplanning <developmentplanning@kaingaora.govt.nz>  
**Subject:** RE: Kāinga Ora Submission on Plan Change 14 of the Operative Christchurch District Plan

## Appendix 3 – Maps of HRZ and Height Variation Control – Maps Riccarton and Hornby

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**From:** Lezel Beneke  
**Sent:** Friday, 12 May 2023 8:51 PM  
**To:** 'engagement@ccc.govt.nz' <[engagement@ccc.govt.nz](mailto:engagement@ccc.govt.nz)>  
**Cc:** developmentplanning <[developmentplanning@kaingaora.govt.nz](mailto:developmentplanning@kaingaora.govt.nz)>  
**Subject:** RE: Kāinga Ora Submission on Plan Change 14 of the Operative Christchurch District Plan

Kia ora,

Cognisant of the size of the document. I have broken the submission into:

- Cover letter
- Appendix 1 – Table of submission points
- Appendix 2 – Metropolitan Centre Zone provisions

I will send Appendix 3 separately.



**Lezel Beneke** MNZPI. BPlan(Hons)

Principal Development Planner

Development Planning

Urban Planning and Design

Mobile: 021 428 055

Email: [lezel.botha@kaingaora.govt.nz](mailto:lezel.botha@kaingaora.govt.nz)

Freephone: 0800 801 601 | Mainline: (021) 428 055 | Kāinga Ora - Homes and Communities

P.O.BOX 2628, WELLINGTON, 6140 | New Zealand Government | [www.kaingaora.govt.nz](http://www.kaingaora.govt.nz)

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**From:** Lezel Beneke

**Sent:** Friday, 12 May 2023 8:48 PM

**To:** 'engagement@ccc.govt.nz' <[engagement@ccc.govt.nz](mailto:engagement@ccc.govt.nz)>

**Cc:** developmentplanning <[developmentplanning@kaingaora.govt.nz](mailto:developmentplanning@kaingaora.govt.nz)>; Brendon Liggett  
<[Brendon.Liggett@kaingaora.govt.nz](mailto:Brendon.Liggett@kaingaora.govt.nz)>

**Subject:** RE: Kāinga Ora Submission on Plan Change 14 of the Operative Christchurch District Plan

Kia ora,

Please find attached the Kāinga Ora submission on Plan Change 14 of the Operative Christchurch District Plan.

Please let us know if you require word documents.

This attachment includes:

- Cover letter
- Appendix 1 – Table of submission points
- Appendix 2 – Metropolitan Centre Zone provisions
- Appendix 3 – Maps of HRZ and Height Variation Control

**Please confirm receipt of the submission once received.**

Kind Regards,



**Lezel Beneke** MNZPI. BPlan(Hons)

Principal Development Planner  
Development Planning  
Urban Planning and Design

Mobile: 021 428 055  
Email: [lezel.botha@kaingaora.govt.nz](mailto:lezel.botha@kaingaora.govt.nz)

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Freephone: 0800 801 601 | Mainline: (021) 428 055 | Kāinga Ora - Homes and Communities  
P.O.BOX 2628, WELLINGTON, 6140 | New Zealand Government | [www.kaingaora.govt.nz](http://www.kaingaora.govt.nz)

[www.govt.nz](http://www.govt.nz) - your guide to finding and using New Zealand government services

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Please:

- (1) reply promptly to that effect, and remove this email, any attachment and the reply from your system;
- (2) do not use, disclose or act on this email in any other way. Thank you.

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[ccc.govt.nz/haveyoursay](http://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\* P. Tucker and C. Vinehead

Postcode\* \_\_\_\_\_

Email \_\_\_\_\_ Phone no. \_\_\_\_\_

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 \_\_\_\_\_

Date 12.5.23



## Have your say

### 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.)

Chapter 13 - Amend } Residential Heritage Area.  
Chapter 14 - Oppose } please see attached  
HRZ } submission and  
MRZ } annexures.

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.)

We wish to amend Chapter 13 and oppose Chapter 14. We live in Windermere Rd. We believe the street should have the status of SC(F) RMA based on previous IHP decision. Increased densing will destroy the character of the Papanui street but also devalue and minimise the war memorial status.

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.)

1. Chapter 13 - extend protection to include the entire of Windermere Road as a place of significant heritage protection.
2. Chapter 14 - no change to current zoning or housing density



## 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.)

To extend protection of Windermere Road from trees/plaques to the avenue itself - to retain the integrity of a war memorial.

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.)

Please see attached.

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.)

To extend Plan change 13  
Sub chapter 9.3  
Historic Heritage Statements

to extend scope of protection on what we believe is trees/plaques in Windermere Road to the entire street and Louisa making HRZ/MRZ inappropriate.

## **Submissions:**

We have lived in the area now for 13 years and have enjoyed the sense of community, heritage and significance in the area. We wish to preserve that going forwards.

We wish to amend Chapter 13 to include Windermere Road as a significant heritage area including the avenue, housing trees and plaques and believe it should have the protection analogous to section 6(f) Resource Management Act.

We oppose chapter 14 with the selection of Windermere Road for a high density/medium density. We do not consider it is appropriate given our distance from Northlands – exceeding the 600metres. The character of the neighbourhood, the history and significance if it, the housing stock, make it unsuitable for commercial development on this scale. We oppose any change in housing density.

We are not alone and refer to the IHP decision, previous expert evidence and submissions, overseas management of tree lined memorial avenues, CCC heritage advice and the RMA. The CCC approach is inconsistent with these findings in our submission.

We oppose the High Density and Medium Density Development in Windermere Road as residents.

### **A. What is the memorial?**

1. With regard to Windermere Road and the associated other 14 avenues the first question to consider is what is the memorial?

### **Historical records**

2. The information on the "Memorial Streets and Their Original Plantings and Dates Planted"<sup>1</sup> shows Windermere Road to have 64 Fraxinus Ornus planted in 1947. When considering the request it was initiated around 14 July 1943.
3. By 25 March 1946 there was a public meeting "to further the project that certain streets in the district to be planted with trees as memorials to the fallen servicemen of the district". The focus was on side streets, not likely to carry arterial traffic.<sup>2</sup> By 20 August 1946 trees were planted in five of the avenues.<sup>3</sup>
4. By 13 May 1946 Windermere Road was being considered.<sup>4</sup>
5. There was no mention in those reports of refining the memorial to the trees and consideration was given in the reports to the width of the road, the traffic density of the road, the minimum width of the footpath, with the focus of a Memorial Street.
6. Plaques were added to the streets by way of public subscription. The trees were paid for by "some contribution should be made forwards the costs by residents of the district"<sup>5</sup>

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<sup>1</sup> list provided

<sup>2</sup> P2 "Memorial Street Trees in Papanui" report

<sup>3</sup> P3 "Memorial Street Trees in Papanui" report

<sup>4</sup> Ref 4/1863 13 May 1946

<sup>5</sup> P3 and 4 "Memorial Street Trees in Papanui"



## How other avenues are treated

7. Comparing other avenues such as ANZAC Avenue in Moreton Bay Queensland that Memorial Avenue included plantings of 1760 trees over the 10 miles at 1 pound per tree.<sup>6</sup> When dealing with subsequent years the article provides that in the late 1950s developers first began purchasing properties for subdivision on the Anzac Memorial Avenue. The Avenue has been widened, officially been reopened in 1993, had to trees removed in 2006, but the integrity of the street has been maintained.<sup>7</sup> In terms of protection is provided the Avenue was listed on the Queensland Heritage register on 5 February 2009 having satisfied the criteria that
  - it was a place of importance in demonstrating the evolutionary pattern of Queensland's history,
  - the place is important in demonstrating the principal characteristics of a particular cultural places,
  - the place is important because of its aesthetic significance,
  - and the place has a special association with life or work of a particular person, group or organisation of importance to Queensland's history.
8. When considering the aesthetic significance the Avenue "is important for visitors experienced while progressing along the route in the visual delight of stretches of striking plantings..."
9. Other significant memorial avenues such as King George V Avenue of Memorial English Oaks in Tamworth Australia was subject to threatened development. This was a memorial to the late King planting an avenue of English oak trees. When considering development it was found that a major subdivision of 500+ lots would cause increased traffic flow, eventual road widening, loss of trees as well as the loss of peace and tranquillity afforded by the trees and quiet location"<sup>8</sup>
10. There are substantial English Memorial avenues and trees. Implicit in these tree-lined streets as the quality of the avenues. When discussing "Change and the Future" :

"like all parks and like many other war memorials, their features are vulnerable to vandalism and metal theft. In addition, many memorial parts, why highly significant in terms of their intangible heritage of civic commemoration and personal histories, were not only as a clean modest designs, but were often spaces dominated by formal recreation provision. Combined with their all being relatively recent in origin, this is meant that their historic landscape interest has been undervalued at a national level and now is only being addressed."<sup>9</sup>
11. New Zealand protection can be afforded under the Resource Management Act - this provides the protection of historic heritage from inappropriate subdivision, use and development.

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<sup>6</sup> P6 of 13 Wikipedia extract Anzac Avenue

<sup>7</sup> P7 of 13 Wikipedia extract Anzac Avenue

<sup>8</sup> P3 of 10 Wikipedia King George V memorial Avenue

<sup>9</sup> P 13 War Memorial Parks and Gardens (UK Article)

## 6 Matters of national importance

In achieving the purpose of this Act, <sup>New Zealand protection</sup> sing functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall recognise and provide for the following matters of national importance:

- (a) the preservation of the natural character of the coastal environment (including the coastal marine area), wetlands, and lakes and rivers and their margins, and the protection of them from inappropriate subdivision, use, and development;
- (b) the protection of outstanding natural features and landscapes from inappropriate subdivision, use, and development;
- (c) the protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna;
- (d) the maintenance and enhancement of public access to and along the coastal marine area, lakes, and rivers;
- (e) the relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga;
- (f) the protection of historic heritage from inappropriate subdivision, use, and development;
- (g) the protection of protected customary rights;
- (h) the management of significant risks from natural hazards.

### B. 2016 Evidence, Submissions and Findings

12. Applying these theories to Windermere Road, in 2016 The Independent Hearing Panel considered in a full hearing the significance of Windermere Road for medium density housing. They were of the view that it was a potential historic heritage site under section 6(f) of the Act as set out below. That suggestion would make the area inappropriate for subdivision, use and development.
13. The key aspects of the decision are set out below.

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

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## DECISION 41

### Chapter 14: Additional Residential Medium Density Areas for Linwood (Eastgate), Hornby and Papanui (Northlands)

#### 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.<sup>14</sup>

[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-](http://www.chchplan.ihp.govt.nz/hearing/additional-residential-medium-density-areas-linwoodeastgate-hornby-papanui-northlands/)

linwoodeastgate-hornby-papanui-northlands/. 9 Additional Residential Medium Density Areas — Chapter 14 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] \_\_\_\_\_ 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. 10 Additional Residential Medium Density Areas — Chapter 14

[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.

## Evidence from the IHP hearing

14. The evidence that the decision was based on is a matter of public record available on the Internet. Relevant extracts from the internet of expert evidence is set out below<sup>10</sup>.
15. Dr Murray Williams provided expert evidence as a member of the Papanui Heritage group as to the has direct nature of the houses in the area. With regard to Windermere Road he confirmed Housing dates back to the 1880s and includes an eclectic mix of housing styles some dating from the late 20<sup>th</sup> century. However there are still examples of interwar bungalows and one superb example of a transitional villa at number 101 that was probably built in the late 19<sup>th</sup> century.
16. As a heritage expert at paragraph 7(m) of his evidence Dr Williams talked of the importance of the War Memorial and the uniqueness of the scope and nature of the scheme to Christchurch. To him

“it was an effective way to beautify the suburb was suggesting themes of reflection and regeneration. Four of these streets Dormer and Perry streets, St James Avenue and Windermere Road are part of this memorial and it is obvious that the trees could be fracture dead by the proposed change in residential density. It is likely some of these trees could be removed to cater for access to smaller lots permitted under the rezoning. In my opinion if this were to occur, it would amount to a gesture of distributed respect in the war and allergist to demolishing and warm Oriel statue or obelisk”

17. His final conclusion was

“approving the recommendation would result in the eventual loss of built heritage created over a period of hundred and 30 years. This would negatively fracture the character of significant areas of Papanui”.

He makes comparisons to other areas that have had development noting

“the remaining original character of that precinct will soon be obliterated”

and this underlines the importance of retaining the areas that have been recommended for a change in zoning both quite he also praises the diversification of houses and streetscapes to provide architectural history.<sup>11</sup>

18. Legal submissions filed by Mr Cleary of Anthony Harper considered that then legislative framework. At paragraph 6.12 of the submissions it is noted there is unchallenged evidence before the panel of the Papanui South range of character and amenity value. The focus of the submissions was whether the unchallenged evidence in relation to the special values of the area, including War Memorial Heritage characteristics and its existing high-quality ill perform are such that lower density RS zoning more appropriately protects and manages these values”

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<sup>10</sup> evidence of Mike Davidson, chair on behalf of Shirley/Papanui community board, P Tucker and C Winefield, M Howley, Dr Murray Williams, and other submitters is attached

<sup>11</sup> paragraphs 7(h), 7(m), 8 and 9 Dr Murray Williams



### **C. Post 2016 Intensification of Windermere Road and area**

19. Since 2016 Windermere Road has come under more pressure with two significant developments in one small street. The rebuild of Te Ora Hau educational facility including increased substantial classrooms has had impact. Significant events occur quite often.







20. The rebuild of the substantial 2 to 3 story Bellevue retirement complex has significantly increased traffic density through staff, visitors and residents and is only half built. The photo below does not show the new wing that is being built on Windermere Road to the rear that is roughly the same size as the existing structure.

[< Back](#)

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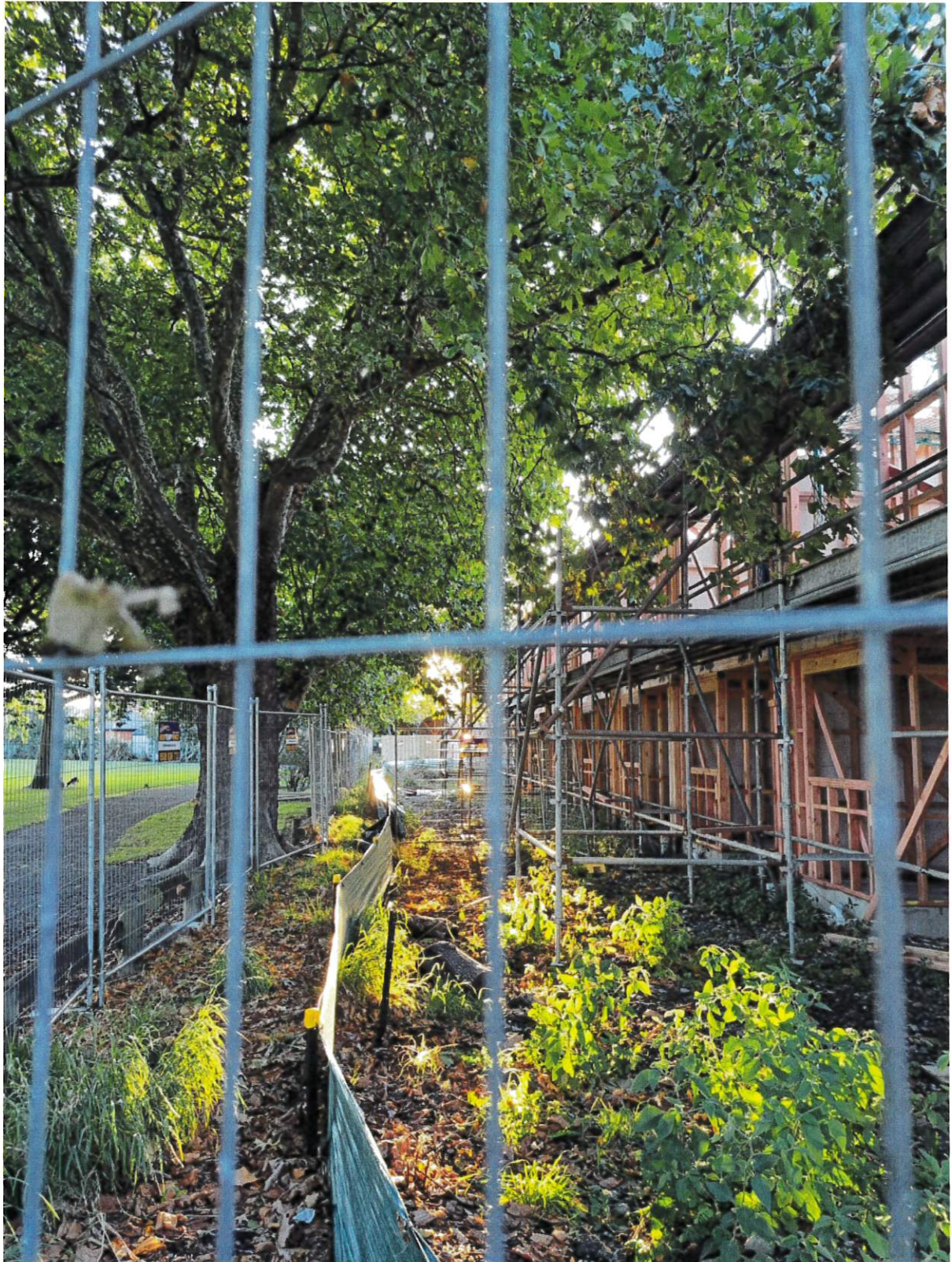
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Papanui  
Christchurch



21. The area is being impacted in other ways through density in terms of housing at 2 storey level. An example of the aesthetic clash between trees and building is set out below with development on the Harewood Road side of St James Park. This is a 2 storey development I believe. With only this height the impact is quite substantial but imagine a 6 storey development and the trees and 'avenue effect'.



22.





**D. What standard has CCC applied?**

23. The Christchurch District Plan – Scheduled Heritage Place Heritage Assessment – Statement of Significance – Heritage Item Number 1459 as set below. In this document the matters that are of significance are the trees and plaques being of high social and historical significance.

- The “Papanui War Memorial Avenues are of high cultural and spiritual significance as memorials to fallen servicemen from the Papanui district”.
- Further it is a living memorial - “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 the trees”.
- The architectural and aesthetic significance for their landscape values.
- Housing is relevant - “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”

24. The conclusion is that: -

“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-site”<sup>12</sup>

25. I suggest this standard is similar to overseas views and Dr Williams and the IHP decision.

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<sup>12</sup> P1 and to Christchurch district plan – scheduled heritage place Heritage assessment – statement of significance heritage item number 1459

**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.


#### **CCC applied a different test**

26. However CCC adopted a restricted view. Correspondence by email from CCC indicates the elements that were to be protected where the trees, the plaques and the "Avenue effect" but that high and medium density would be permitted with no protection for the avenue itself.

27. The email suggested the housing and the avenues were evaluated is not meeting the criteria required for a protection as a residential Heritage area. This is disputed.
28. This leads to 2 issues. The "Avenue effect" requires an Avenue in our submission. Looking at the precedents above and definitions above an Avenue is something that provides aesthetic significance and is dependent not only the trees and plaques but the street itself.
29. Breaking this in parts - the trees, the plaques, the housing, the architecture and aesthetic value were of importance in CCCs report above. No attempt was made in this document to segregate trees and plaques from housing, the avenues themselves or to provide a justification of how the Avenue effect would remain in place if housing, architecture, and arguably aesthetic effect no longer existed. The significance of the area was a combination of all of the elements.
30. I requested an Official Information Act request to find out more about how CCC had come to the conclusion that the trees and plaques would sit alongside high-density and medium density housing without impacting on the Avenue effect. That was requested on 27 February 2023 and no information has been provided. The assumption therefore is that this information is unchallenged. As it is placed on the CCC website with regard to identifying why Windermere Road is a heritage area this assumption seems reasonable. I would like to chance to respond to any information I do receive with an updated submission.
31. Looking at comparisons: -
- the steps that have been taken overseas to preserve the Avenue has included preserving the avenue along with the trees and the plaques.
  - Memorial Avenue to the airport has not been included in the development and presumably the rationale for its exclusion is its layout and Memorial status. It is similar to that of Windermere Road. It is a Memorial Avenue with an Avenue effect.
32. The criticism that the housing lacks aesthetic value – I suggest the housing is of aesthetic significance and of historical value going forwards based on expert reporting and the IHP decision.
33. We rely on the document above from CCC that concludes the Avenue, along with its housing, is or architectural significance.
34. We refer to the findings of Dr Williams. It was recorded in the submissions the Papanui evidence was unchallenged. Dr Williams expert evidence is that Windermere Road does contain housing that qualifies and in fact is important for heritage consistent with the report writer above.
35. The findings of the Independent hearing panel are relevant particular with regard to the comments around section 6(f) of the RMA. Section 6 (f) is similar to findings of others above that the development including subdivision and integrity of the memorial are inconsistent. I am not aware this has been addressed.

**E. What evidence is there the integrity of the memorial avenues will be maintained without protection against housing density?**

36. We suggest the Avenue effect will deteriorate - with high-density development and medium density development on Windermere Road traffic will increase and car parking and congestion. It is already a through road often used by commuters to avoid Harewood Road/Grahams Road corner in the rush hour. Waimairi school traffic continues to park on the street. The loading has increased with Te Ora Hau and Bellevue retirement complex and apartments. This will increase as the retirement complex and apartments new wing is finished.
37. The sheer height and imposing nature of high density and medium density buildings will impact on the aesthetics and architectural integrity. The photo of the small St James Park development shows the impact of development against the trees. The modern housing will lack character and erode the character housing stock.
38. The impact of building works, Sewerage Works, driveway works will impact on the trees. Already with houses being built have been issues with developers wanting to remove or closely encroach on trees.
39. Quite simply, the Avenue effect will be lost. The close proximity of trees and high-density apartment blocks or multi-storey houses will be inconsistent with the memorial effect.
40. Very little has been done to date to lift profile of the significant living memorials and despite that CCC conclude there is "regular commemorative events associated with the avenues and the trees".
41. Windermere Road is a significant area. It is of value to all who have had family lost in both first and second World Wars. It is part of a sequence linking the cemetery, St James park trees and memorial rose garden to the wider Papanui Avenues with their specific plantings. Windermere Road has a friendly sense of community and some families have lived there for some generations. The street trees are something we as residents we are aware of, and proud to be associated with. It would be of great benefit to know, as residents, the history was being protected, retained and enhanced. It should be allowed to "live" going forwards. The pressure for development needs to be balanced with heritage as the commentary above suggests.
42. It is our submission that an avenue effect includes the trees and plaques but essential to the character is the avenue and housing that the trees rely on – without that it will be a street with some trees dwarfed by huge buildings. In my view it will irreversibly diminish the memorial and is inconsistent with the duty to preserve our heritage. There are examples of development of 2 storey housing units that can be consistent with both increasing density and preserving character that should be a first resort



PK Tucker and CS Winefield





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\* P. Tucker and C. Vinehead

[Redacted] Postcode\* [Redacted]

Email [Redacted] Phone no. [Redacted]

If you are responding on behalf of a recognised organisation, please provide:

Organisation's name [Redacted]

Your role [Redacted]

### 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 [Signature] Date 12.5.23



## Have your say

### 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.)

Chapter 13 - Amend } Residential Heritage Area.  
Chapter 14 - Oppose } please see attached  
HRZ } submission and  
MRZ } annexures.

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.)

We wish to amend Chapter 13 and oppose Chapter 14. We live in Windermere Rd. We believe the street should have the status of SC(F) RMA based on previous IHP decision. Increased densing will destroy the character of the Papanui street but also devalue and minimise the war memorial status.

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.)

1. Chapter 13 - extend protection to include the entire of Windermere Road as a place of significant heritage protection.
2. Chapter 14 - no change to current zoning or housing density



## 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.)

To extend protection of Windermere Road from trees/plaques to the avenue itself - to retain the integrity of a war memorial.

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.)

Please see attached.

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.)

To extend Plan change 13  
Sub chapter 9.3  
Historic Heritage Statements

to extend scope of protection on what we believe is trees/plaques in Windermere Road to the entire street and Louisa making HRZ/MRZ inappropriate.

### Submissions:

We have lived in the area now for 13 years and have enjoyed the sense of community, heritage and significance in the area. We wish to preserve that going forwards.

We wish to amend Chapter 13 to include Windermere Road as a significant heritage area including the avenue, housing trees and plaques and believe it should have the protection analogous to section 6(f) Resource Management Act.

We oppose chapter 14 with the selection of Windermere Road for a high density/medium density. We do not consider it is appropriate given our distance from Northlands – exceeding the 600metres. The character of the neighbourhood, the history and significance if it, the housing stock, make it unsuitable for commercial development on this scale. We oppose any change in housing density.

We are not alone and refer to the IHP decision, previous expert evidence and submissions, overseas management of tree lined memorial avenues, CCC heritage advice and the RMA. The CCC approach is inconsistent with these findings in our submission.

We oppose the High Density and Medium Density Development in Windermere Road as residents.

#### A. What is the memorial?

1. With regard to Windermere Road and the associated other 14 avenues the first question to consider is what is the memorial?

#### Historical records

2. The information on the "Memorial Streets and Their Original Plantings and Dates Planted"<sup>1</sup> shows Windermere Road to have 64 Fraxinus Ornus planted in 1947. When considering the request it was initiated around 14 July 1943.
3. By 25 March 1946 there was a public meeting "to further the project that certain streets in the district to be planted with trees as memorials to the fallen servicemen of the district". The focus was on side streets, not likely to carry arterial traffic.<sup>2</sup> By 20 August 1946 trees were planted in five of the avenues.<sup>3</sup>
4. By 13 May 1946 Windermere Road was being considered.<sup>4</sup>
5. There was no mention in those reports of refining the memorial to the trees and consideration was given in the reports to the width of the road, the traffic density of the road, the minimum width of the footpath, with the focus of a Memorial Street.
6. Plaques were added to the streets by way of public subscription. The trees were paid for by "some contribution should be made forwards the costs by residents of the district"<sup>5</sup>

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<sup>1</sup> list provided

<sup>2</sup> P2 "Memorial Street Trees in Papanui" report

<sup>3</sup> P3 "Memorial Street Trees in Papanui" report

<sup>4</sup> Ref 4/1863 13 May 1946

<sup>5</sup> P3 and 4 "Memorial Street Trees in Papanui"



### How other avenues are treated

7. Comparing other avenues such as ANZAC Avenue in Moreton Bay Queensland that Memorial Avenue included plantings of 1760 trees over the 10 miles at 1 pound per tree.<sup>6</sup> When dealing with subsequent years the article provides that in the late 1950s developers first began purchasing properties for subdivision on the Anzac Memorial Avenue. The Avenue has been widened, officially been reopened in 1993, had to trees removed in 2006, but the integrity of the street has been maintained.<sup>7</sup> In terms of protection is provided the Avenue was listed on the Queensland Heritage register on 5 February 2009 having satisfied the criteria that
  - it was a place of importance in demonstrating the evolutionary pattern of Queensland's history,
  - the place is important in demonstrating the principal characteristics of a particular cultural places,
  - the place is important because of its aesthetic significance,
  - and the place has a special association with life or work of a particular person, group or organisation of importance to Queensland's history.
8. When considering the aesthetic significance the Avenue "is important for visitors experienced while progressing along the route in the visual delight of stretches of striking plantings..."
9. Other significant memorial avenues such as King George V Avenue of Memorial English Oaks in Tamworth Australia was subject to threatened development. This was a memorial to the late King planting an avenue of English oak trees. When considering development it was found that a major subdivision of 500+ lots would cause increased traffic flow, eventual road widening, loss of trees as well as the loss of peace and tranquillity afforded by the trees and quiet location"<sup>8</sup>
10. There are substantial English Memorial avenues and trees. Implicit in these tree-lined streets as the quality of the avenues. When discussing "Change and the Future" :
 

"like all parks and like many other war memorials, their features are vulnerable to vandalism and metal theft. In addition, many memorial parts, why highly significant in terms of their intangible heritage of civic commemoration and personal histories, were not only as a clean modest designs, but were often spaces dominated by formal recreation provision. Combined with their all being relatively recent in origin, this is meant that their historic landscape interest has been undervalued at a national level and now is only being addressed."<sup>9</sup>
11. New Zealand protection can be afforded under the Resource Management Act - this provides the protection of historic heritage from inappropriate subdivision, use and development.

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<sup>6</sup> P6 of 13 Wikipedia extract Anzac Avenue

<sup>7</sup> P7 of 13 Wikipedia extract Anzac Avenue

<sup>8</sup> P3 of 10 Wikipedia King George V memorial Avenue

<sup>9</sup> P 13 War Memorial Parks and Gardens (UK Article)



## 6 Matters of national importance

In achieving the purpose of this Act, the [New Zealand protection]sing functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall recognise and provide for the following matters of national importance:

- (a) the preservation of the natural character of the coastal environment (including the coastal marine area), wetlands, and lakes and rivers and their margins, and the protection of them from inappropriate subdivision, use, and development;
- (b) the protection of outstanding natural features and landscapes from inappropriate subdivision, use, and development;
- (c) the protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna;
- (d) the maintenance and enhancement of public access to and along the coastal marine area, lakes, and rivers;
- (e) the relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga;
- (f) the protection of historic heritage from inappropriate subdivision, use, and development;
- (g) the protection of protected customary rights;
- (h) the management of significant risks from natural hazards.

### B. 2016 Evidence, Submissions and Findings

12. Applying these theories to Windermere Road, in 2016 The Independent Hearing Panel considered in a full hearing the significance of Windermere Road for medium density housing. They were of the view that it was a potential historic heritage site under section 6(f) of the Act as set out below. That suggestion would make the area inappropriate for subdivision, use and development.
13. The key aspects of the decision are set out below.

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

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## DECISION 41

### Chapter 14: Additional Residential Medium Density Areas for Linwood (Eastgate), Hornby and Papanui (Northlands)

#### 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.<sup>14</sup>

[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-](http://www.chchplan.ihp.govt.nz/hearing/additional-residential-medium-density-areas-linwoodeastgate-hornby-papanui-northlands/)

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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.

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[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] \_\_\_\_\_ 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. 10 Additional Residential Medium Density Areas — Chapter 14

[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.



### Evidence from the IHP hearing

14. The evidence that the decision was based on is a matter of public record available on the Internet. Relevant extracts from the internet of expert evidence is set out below<sup>10</sup>.
15. Dr Murray Williams provided expert evidence as a member of the Papanui Heritage group as to the has direct nature of the houses in the area. With regard to Windermere Road he confirmed Housing dates back to the 1880s and includes an eclectic mix of housing styles some dating from the late 20<sup>th</sup> century. However there are still examples of interwar bungalows and one superb example of a transitional villa at number 101 that was probably built in the late 19<sup>th</sup> century.
16. As a heritage expert at paragraph 7(m) of his evidence Dr Williams talked of the importance of the War Memorial and the uniqueness of the scope and nature of the scheme to Christchurch. To him

“it was an effective way to beautify the suburb was suggesting themes of reflection and regeneration. Four of these streets Dormer and Perry streets, St James Avenue and Windermere Road are part of this memorial and it is obvious that the trees could be fracture dead by the proposed change in residential density. It is likely some of these trees could be removed to cater for access to smaller lots permitted under the rezoning. In my opinion if this were to occur, it would amount to a gesture of distributed respect in the war and allergist to demolishing and warm Oriel statue or obelisk”

17. His final conclusion was

“approving the recommendation would result in the eventual loss of built heritage created over a period of hundred and 30 years. This would negatively fracture the character of significant areas of Papanui”.

He makes comparisons to other areas that have had development noting

“the remaining original character of that precinct will soon be obliterated”

and this underlines the importance of retaining the areas that have been recommended for a change in zoning both quite he also praises the diversification of houses and streetscapes to provide architectural history.<sup>11</sup>

18. Legal submissions filed by Mr Cleary of Anthony Harper considered that then legislative framework. At paragraph 6.12 of the submissions it is noted there is unchallenged evidence before the panel of the Papanui South range of character and amenity value. The focus of the submissions was whether the unchallenged evidence in relation to the special values of the area, including War Memorial Heritage characteristics and its existing high-quality ill perform are such that lower density RS zoning more appropriately protects and manages these values”

<sup>10</sup> evidence of Mike Davidson, chair on behalf of Shirley/Papanui community board, P Tucker and C Winefield, M Howley, Dr Murray Williams, and other submitters is attached

<sup>11</sup> paragraphs 7(h), 7(m), 8 and 9 Dr Murray Williams

**C. Post 2016 Intensification of Windermere Road and area**

19. Since 2016 Windermere Road has come under more pressure with two significant developments in one small street. The rebuild of Te Ora Hau educational facility including increased substantial classrooms has had impact. Significant events occur quite often.







20. The rebuild of the substantial 2 to 3 story Bellevue retirement complex has significantly increased traffic density through staff, visitors and residents and is only half built. The photo below does not show the new wing that is being built on Windermere Road to the rear that is roughly the same size as the existing structure.

[< Back](#)

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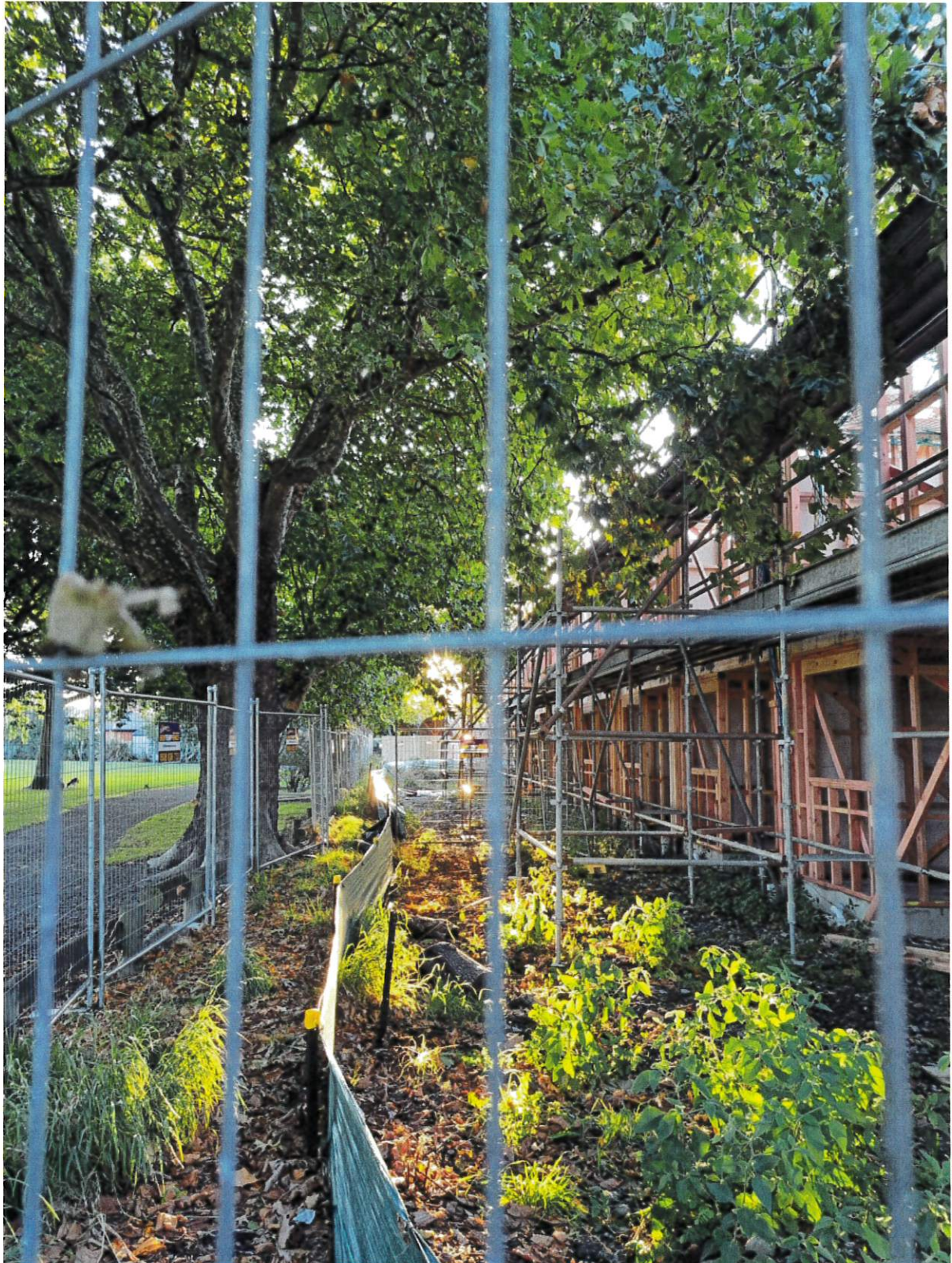
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21. The area is being impacted in other ways through density in terms of housing at 2 storey level. An example of the aesthetic clash between trees and building is set out below with development on the Harewood Road side of St James Park. This is a 2 storey development I believe. With only this height the impact is quite substantial but imagine a 6 storey development and the trees and 'avenue effect'.



22.





**D. What standard has CCC applied?**

23. The Christchurch District Plan – Scheduled Heritage Place Heritage Assessment – Statement of Significance – Heritage Item Number 1459 as set below. In this document the matters that are of significance are the trees and plaques being of high social and historical significance.

- The “Papanui War Memorial Avenues are of high cultural and spiritual significance as memorials to fallen servicemen from the Papanui district”.
- Further it is a living memorial - “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 the trees”.
- The architectural and aesthetic significance for their landscape values.
- Housing is relevant - “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”

24. The conclusion is that: -

“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-site”<sup>12</sup>

25. I suggest this standard is similar to overseas views and Dr Williams and the IHP decision.

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<sup>12</sup> P1 and to Christchurch district plan – scheduled heritage place Heritage assessment – statement of significance heritage item number 1459

**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.


### **CCC applied a different test**

26. However CCC adopted a restricted view. Correspondence by email from CCC indicates the elements that were to be protected where the trees, the plaques and the "Avenue effect" but that high and medium density would be permitted with no protection for the avenue itself.

27. The email suggested the housing and the avenues were evaluated is not meeting the criteria required for a protection as a residential Heritage area. This is disputed.
28. This leads to 2 issues. The "Avenue effect" requires an Avenue in our submission. Looking at the precedents above and definitions above an Avenue is something that provides aesthetic significance and is dependent not only the trees and plaques but the street itself.
29. Breaking this in parts - the trees, the plaques, the housing, the architecture and aesthetic value were of importance in CCCs report above. No attempt was made in this document to segregate trees and plaques from housing, the avenues themselves or to provide a justification of how the Avenue effect would remain in place if housing, architecture, and arguably aesthetic effect no longer existed. The significance of the area was a combination of all of the elements.
30. I requested an Official Information Act request to find out more about how CCC had come to the conclusion that the trees and plaques would sit alongside high-density and medium density housing without impacting on the Avenue effect. That was requested on 27 February 2023 and no information has been provided. The assumption therefore is that this information is unchallenged. As it is placed on the CCC website with regard to identifying why Windermere Road is a heritage area this assumption seems reasonable. I would like to chance to respond to any information I do receive with an updated submission.
31. Looking at comparisons: -
  - the steps that have been taken overseas to preserve the Avenue has included preserving the avenue along with the trees and the plaques.
  - Memorial Avenue to the airport has not been included in the development and presumably the rationale for its exclusion is its layout and Memorial status. It is similar to that of Windermere Road. It is a Memorial Avenue with an Avenue effect.
32. The criticism that the housing lacks aesthetic value – I suggest the housing is of aesthetic significance and of historical value going forwards based on expert reporting and the IHP decision.
33. We rely on the document above from CCC that concludes the Avenue, along with its housing, is or architectural significance.
34. We refer to the findings of Dr Williams. It was recorded in the submissions the Papanui evidence was unchallenged. Dr Williams expert evidence is that Windermere Road does contain housing that qualifies and in fact is important for heritage consistent with the report writer above.
35. The findings of the Independent hearing panel are relevant particular with regard to the comments around section 6(f) of the RMA. Section 6 (f) is similar to findings of others above that the development including subdivision and integrity of the memorial are inconsistent. I am not aware this has been addressed.

**E. What evidence is there the integrity of the memorial avenues will be maintained without protection against housing density?**

36. We suggest the Avenue effect will deteriorate - with high-density development and medium density development on Windermere Road traffic will increase and car parking and congestion. It is already a through road often used by commuters to avoid Harewood Road/Grahams Road corner in the rush hour. Waimairi school traffic continues to park on the street. The loading has increased with Te Ora Hau and Bellevue retirement complex and apartments. This will increase as the retirement complex and apartments new wing is finished.
37. The sheer height and imposing nature of high density and medium density buildings will impact on the aesthetics and architectural integrity. The photo of the small St James Park development shows the impact of development against the trees. The modern housing will lack character and erode the character housing stock.
38. The impact of building works, Sewerage Works, driveway works will impact on the trees. Already with houses being built have been issues with developers wanting to remove or closely encroach on trees.
39. Quite simply, the Avenue effect will be lost. The close proximity of trees and high-density apartment blocks or multi-storey houses will be inconsistent with the memorial effect.
40. Very little has been done to date to lift profile of the significant living memorials and despite that CCC conclude there is "regular commemorative events associated with the avenues and the trees".
41. Windermere Road is a significant area. It is of value to all who have had family lost in both first and second World Wars. It is part of a sequence linking the cemetery, St James park trees and memorial rose garden to the wider Papanui Avenues with their specific plantings. Windermere Road has a friendly sense of community and some families have lived there for some generations. The street trees are something we as residents we are aware of, and proud to be associated with. It would be of great benefit to know, as residents, the history was being protected, retained and enhanced. It should be allowed to "live" going forwards. The pressure for development needs to be balanced with heritage as the commentary above suggests.
42. It is our submission that an avenue effect includes the trees and plaques but essential to the character is the avenue and housing that the trees rely on – without that it will be a street with some trees dwarfed by huge buildings. In my view it will irreversibly diminish the memorial and is inconsistent with the duty to preserve our heritage. There are examples of development of 2 storey housing units that can be consistent with both increasing density and preserving character that should be a first resort



PK Tucker and CS Winefield





**BEFORE THE CHRISTCHURCH REPLACEMENT DISTRICT PLAN HEARINGS  
PANEL**

**UNDER** The Resource Management Act 1991 and the Canterbury  
Earthquake (Christchurch Replacement District Plan) Order 2014

**AND**

**IN THE MATTER** of the Residential Chapter 14 Proposal – Additional Residential  
Medium Density areas for Linwood (Eastgate), Hornby and  
Papanui (Northlands)

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**SUBMISSIONS ON BEHALF OF MARGARET HOWLEY, PHILLIPA TUCKER & ORS  
15 JULY 2016**

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**Anthony Harper**

Solicitor Acting: Gerard Cleary  
Level 9, HSBC Tower  
62 Worcester Boulevard,  
PO Box 2646, Christchurch  
Tel +64 3 379 0920  
Fax +64 3 366 9277  
[www.anthonharper.co.nz](http://www.anthonharper.co.nz)

## Introduction

- 1 These submissions are filed on behalf of the following submitters on the Additional RMD Proposal for Papanui:
  - Stuart Crichton (RMD114);
  - Michael Hillard (RMD93);
  - Jeanette Spencer (RMD93);
  - Valarie Sykes (RMD111);
  - Neil Davidson (RMD85);
  - Anna Hall (Group submission RMD 82)
  - Christopher Winefield and Philippa Tucker (RMD89);
  - Susan Dawber (Group submission RMD82);
  - Mary Scales (RMD129);
  - Leah Scales (RMD102);
  - Graeme Keeley (RMD70);
  - Margaret Howley (RMD130); and
  - Paul Scott (FS27).

(Collectively the "Papanui Residents")
- 2 The Papanui Residents have been financially constrained as to the extent of evidence and legal assistance they could provide at the recent hearing. Effectively, their case has been limited to the expert evidence of Dr. Williams, together with the lay evidence of a number of the Papanui Residents themselves. The Panel will no doubt have noted the extent of local knowledge contained within this well-informed lay evidence.
- 3 The Papanui Residents have engaged in prior consultation with the Council on the appropriateness of RMD zoning for Papanui and have been involved in mediation on the current proposal.
- 4 The general position of the Papanui Residents is that they oppose the RMD Zoning for Papanui South and Papanui South West (together "Papanui South"). As such, they support the recommendations of Ms Oliver in her evidence in chief and rebuttal.
- 5 The case for the Papanui Residents can be summarised as follows:
  - 5.1 The Objectives and Policies of Chapter 6 of the Regional Policy Statement do not require the Panel to rezone Papanui South as RMD;

- 5.2 When read as a whole, the Strategic Directions and Residential Objectives and Police make it neither necessary nor more appropriate to rezone Papanui South as RMD.
- 5.3 The locational criteria for supporting the establishment of new RMD Zones in Policy 14.1.1.2 are a starting point for a decision on whether it is appropriate to rezone Papanui South. A further granular assessment is required. In that respect:
- (a) The Papanui Residents agree with the assessments by Ms Oliver and Ms Schroeder that the character and amenity values of Papanui South make an RMD zone inappropriate.
  - (b) The valuation analysis of Papanui undertaken by Mr. Blake is inadequate as it fails to address relevant matters identified in evidence for the Residential Stage 1 hearing. As a consequence, there is a high probability that Mr. Blake's evidence overstates the likelihood of redevelopment for medium density within Papanui South ;
- 5.4 On the basis of significant new information, the Panel can find that Papanui South has values which are worthy of identification, and which are more appropriately managed by the Residential Suburban Zoning.
- 5.5 If the Panel decide to rezone part or all of Papanui South as RMD, the Papanui Residents support the amended map identifying Langdons Road as an appropriate location from which to apply the 800m locational criterion.
- 5.6 The Papanui Residents oppose the 11 metre height limit overlay sought by Housing New Zealand.

## 6 **GIVING EFFECT TO THE INTENSIFICATION PROVISIONS OF CHAPTER 6 OF THE CANTERBURY REGIONAL POLICY STATEMENT**

- 6.1 Objective 6.2.2 – *Urban Form and settlement pattern* sets a goal of consolidation and intensification of existing urban areas, by amongst others:
- (1) aiming to achieve the following targets for intensification as a proportion of overall growth*
- through the period of recovery:*
- (a) 35% averaged over the period between 2013 and 2016*
  - (b) 45% averaged over the period between 2016 to 2021*
  - (c) 55% averaged over the period between 2022 and 2028;*
- (2) providing higher density living environments including mixed use developments and a greater range of housing types, particularly in and around*

*the Central City, in and around Key Activity Centres, and larger neighbourhood centres, and in greenfield priority areas and brownfield sites;*

- 6.2 "Intensification" for the purposes of this Objective is identified as: "an increase in the residential household yield within existing urban areas. For the purposes of the Replacement Plan, the Objective therefore applies (at least) across all residential zones, Residential Suburban and Residential Suburban Density Transition included.
- 6.3 Priority areas for achieving higher density living environments are in and around the Central City, Key Activity Centres, larger neighbourhood centres, and in greenfield priority areas and brownfield sites.
- 6.4 In respect of greenfield priority areas, the Panel has yet to make a decision on whether to enable higher densities within, for example, the North Halswell Residential New Neighbourhood Zone. From counsel's involvement on behalf of another client, it is understood there is no opposition to this enablement, at least in a policy sense.
- 6.5 It is also understood that the ability to provide for higher densities within greenfield priority areas has not been factored into any of intensification capacity analysis undertaken for the Residential Stage 1 hearing. It is suggested therefore that, if the Panel is minded to remove Papanui South from the proposed RMD area, any potential reduction in medium density zoning capacity is likely to be compensated for in North Halswell, if not elsewhere.<sup>1</sup>
- 6.6 Objective 6.2.3 *Sustainability* relevantly states that recovery and rebuilding is undertaken in a way that *retains identified areas of special amenity and heritage values*. The explanation states:
- Intensification and consolidation of residential development in Christchurch needs to protect areas of special amenity and historic heritage value, as these contribute to the areas's identity and character. For Greater Christchurch particular attention should be paid to the provision of open space, maintenance and promotion of a sense of identity and character, and the availability of community and recreation facilities and appropriately located business centres, so as to ensure the maintenance and/ or provision of high quality living environments.*
- 6.7 Policy 6.3.1 *Development within the Greater Christchurch area* repeats that Key Activity Centres provide a focus for commercial activities and residential intensification. This focus is broadened in a subsequent Policy 6.3.7 - *Residential location, yield and intensification* to refer to the other areas identified in Objective 6.2.2. Methods of implementation include a

<sup>1</sup> For example, and subject to resolving the issue of scope, other areas identified in submissions may well compensate for the potential reduction.

requirement on Council to identify areas in district plans that are suitable for urban intensification, including brownfield redevelopment.

- 6.8 The principal reasons and explanation for Policy 6.3.7 include the following:

*....Further work will be required to increase intensification, and work towards accommodating future growth. Certain areas in Christchurch City have been identified for more intensive residential use for many years. Other suitable areas may be identified, including the redevelopment of brownfields sites for residential or mixed-use activities.*

- 6.9 Applying all of the above to the present circumstances, it is submitted that in order to give effect to the RPS, there is no mandatory requirement in the Replacement Plan to rezone Papanui South even if it were to be geographically described as being "around" the Papanui KAC. By way of simple comparison, areas for intensification have not been specifically identified unlike residential Greenfield Priority Areas (Map A), which must be rezoned in the Replacement Plan to give effect to the RPS and the companion Land Use Recovery Plan (LURP).

- 6.10 In contrast to, for example, the language of avoidance used prolifically within Chapter 6, the "aim to achieve" wording of Objective 6.2.2 in respect of intensification targets is far from prescriptive. Rather, the wording can be described as aspirational as indeed are the targets themselves. Similarly, the implementing Policy 6.3.7 does not state that new areas of intensification must be identified; rather, other suitable areas may be identified.

- 6.11 Furthermore, Objective 6.2.3 makes it clear that intensification is not to be achieved at all costs; rather it must protect areas that have special amenity character and heritage. Intensification is therefore likely to be inappropriate in locations where protection of these values is not achievable.

- 6.12 The unchallenged evidence before the Panel is of course that Papanui South has a range of character and amenity values that, in my submission, make a Residential Suburban zoning more appropriate than a RMD zoning for this area. Understandably, the Panel has commented adversely on the timing of receipt of this evidence i.e it should have been produced by the Council at the Residential Stage 1 hearing. As is discussed below, this belated receipt of important new evidence is not fatal to the case for the Papanui Residents.



## 7 OBJECTIVES AND POLICIES OF THE STRATEGIC DIRECTIONS AND RESIDENTIAL CHAPTERS

- 7.1 Relevant Objectives within the Strategic Directions Chapter include Objective 3.3.4 and 3.3.7:

### **3.3.4 Objective - Housing capacity and choice**

*(a) For the period 2012 to 2028, an additional 23,700 dwellings are enabled through a combination of residential intensification, brownfield and greenfield development; and*

*(b) There is a range of housing opportunities available to meet the diverse and changing population and housing needs of Christchurch residents, including:*

*(i) a choice in housing types, densities and locations; and*

*(ii) affordable, community and social housing and papakāinga.*

### **3.3.7 Objective Urban growth, form and design**

*A well-integrated pattern of development and infrastructure, a consolidated urban form, and a high quality urban environment that:*

*(a) Is attractive to residents, business and visitors; and*

*(b) Has its areas of special character and amenity value identified and their specifically recognised values appropriately managed; and*

*...*

*(d) Increases the housing development opportunities in the urban area to meet the intensification targets specified in the Canterbury Regional Policy Statement, Chapter 6, Objective 6.2.2 (1); particularly:*

*(i) In and around the Central City, Key Activity Centres (as identified in the Canterbury Regional Policy Statement), larger neighbourhood centres, and nodes of core public transport routes; and*

*(ii) in those parts of Residential Greenfield Priority Areas identified in Map A, Chapter 6 of the Canterbury Regional Policy Statement; and*

*(iii) in suitable brownfield areas; and*

*(e) Maintains and enhances the Central City, Key Activity Centres and Neighbourhood Centres as community focal points; and*

*(f) Identifies opportunities for, and supports, the redevelopment of brownfield sites for residential, business or mixed use activities; and*

...

- 7.2 Within the Residential Chapter, relevant objectives and policies include of course Objective 14.1.1 relating to housing supply. This Policy is to be implemented by, amongst others, Policy 14.1.12 *Establishment of New Medium Density Residential Areas*:

**14.1.1.2 Policy - Establishment of new medium density residential areas**

*a. Support establishment of new residential medium density zones to meet demand*

*for 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 4000m<sup>2</sup>; and*
- iv. a public full primary school, or a public primary or intermediate school.*

- 7.3 Also of relevance is Objective 14.1.4:

**14.1.4 Objective - High quality residential environments**

*a. High quality, sustainable, residential neighbourhoods which are well designed, have a high level of amenity, enhance local character and reflect the Ngāi Tahu heritage of Ōtautahi.*

- 7.4 The above Objective is supported by a range of policies, including Policy 14.1.4.2 relevant to medium density development.

**14.1.4.2 Policy - High quality, medium density residential development**

*a. Encourage innovative approaches to comprehensively designed, high quality, medium density residential development, which is attractive to residents, responsive to housing demands, and provides a positive contribution to its environment (while acknowledging the need for increased densities and changes in residential character), through:*

- i. consultative planning approaches to identifying particular areas for residential intensification and to defining high quality, built and urban design outcomes for those areas;*
- ii. encouraging and incentivising amalgamation and redevelopment across large-scale residential intensification areas;*
- iii. providing design guidelines to assist developers to achieve high quality, medium density development;*
- iv. considering input from urban design experts into resource consent applications;*
- v. promoting incorporation of low impact urban design elements, energy and water efficiency, and life-stage inclusive and adaptive design; and*
- vi. recognising that built form standards may not always support the best design and efficient use of a site for medium density development, particularly for larger sites.*

7.5 In addition, there are a range of further policies dealing with specific intensification mechanism and also provision of housing opportunities for the aged. All of these other policies are positively implemented by rules that are vastly more permissive than the previous City Plan.

7.6 At the hearing, witnesses on behalf of Housing New Zealand (HNZ) were questioned on HNZ's base position that areas which meet the locational criteria in Policy 14.1.1.2 must be zoned as RMD.<sup>2</sup> The answers provided by both Ms. Rennie or Ms Styles did not support their client's position:

*MS SCOTT: No, sir. If I can turn you, Ms Rennie, to the policy 14.1.1.2. So sub clause (a) that sets out what we call the locational criteria. The first words of that policy, they say, the policy uses the words "support establishment of new Residential Medium Density zones", do you see those words there?*

*MS RENNIE: Yes.*

*MS SCOTT: They don't say, do they, that the Council must rezone all land that meets that criteria?*

*MS RENNIE: No, that is not what it says. It says "support establishment of new residential density zoned to meet demand for housing within 800 metres" of those range of considerations.*

<sup>2</sup> Opening submissions on behalf of Housing New Zealand at paragraph 29

*MS SCOTT: So do you agree with me that policy 14.1.1.2(a) is not the only relevant consideration that the Council must take into account when rezoning land to RMD?*

*MS RENNIE: This is the policy which enables the establishment of new residential medium density areas.*

*MS SCOTT: Yes, and then the Council must consider other relevant objectives and policies in both chapter 3, the strategic directions, and elsewhere in chapter 14, do you agree with that?*

*MS RENNIE: This is one of a number of policies, yes.<sup>3</sup>*

....

*MS SCOTT: And Mr Jolly for the Council. You understand that the Council's position is that the locational criteria should not be the sole driver for rezoning to RMD but that all relevant objectives and policies must be considered and balanced. You understand that is the Council's position?*

*MS STYLES: I understand.*

*MS SCOTT: The section 32 evaluation requires as to zoning further consideration in terms of detailed matters of urban form, effects on character and amenity and the specific needs of local communities by way of example?*

*MS STYLES: Yes.*

....

*MS SCOTT: Thank you, so in terms of the Panel's decision-making on the appropriate zoning the locational criteria are not the only relevant factor, it must go beyond that policy and consider other relevant objectives and policies, correct?*

*MS STYLES: I believe that a hierarchical approach needs to be taken looking at the objectives and policies from the strategic objectives down through, but that policy 14.1.1.2 provides the locational criteria where RMD should or should not be depending on which part of that policy you are looking at. Beyond that there are a whole range of other considerations but that is the primary focus on location.<sup>4</sup>*

- 7.7 Consistent with the approach adopted by the Council in opening and through its cross-examination, it is submitted that the concessions made by HNZ's

<sup>3</sup> Transcript at Page 107

<sup>4</sup> Transcript at Page 122

witnesses that a range of other factors and policies must be considered as part of the s 32 & 32AA analysis is appropriate.

- 7.8 The s 32 analysis must take into account factors such as the appropriateness of a chosen location in terms of feasibility and efficiency of a proposed rezoning. Matters such as the special characteristics and heritage and amenity of a candidate area must also be addressed, otherwise a decision-maker is left within incomplete information as to whether or not a proposed RMD zoning is the most appropriate method for implementing all relevant objectives and policies. The results of the consultation process undertaken by the Council must also be considered, as is anticipated by Policy 14.1.4.2. In that respect, the views expressed by those most directly affected do not support the change to the character of the Papanui South area that would be wrought by an RMD zoning.
- 7.9 Objective 3.3.7 recognises the need for a high quality urban environment, one that appropriately manages areas of special character and amenity (3.3.7 b). As such, the values associated with Papanui South should be taken into account in deciding whether or not a RMD zoning for Papanui South is more appropriate than the Residential Suburban Zone in implementing this Objective. To repeat, the unchallenged evidence regarding the special values of this area, including its war memorial heritage characteristics and its existing high quality built form, are such that the lower density RS zoning more appropriately protects or manages these values.
- 7.10 Equally, it is submitted that there is no evidence, persuasive or otherwise, that the Residential Suburban zoning of Papanui South will in any way compromise the housing supply Objective 3.3.4. Nor is there evidence that the monitoring requirements in Chapter 14 will not address any negligible reduction in RMD capacity should the relatively limited area that is Papanui South be zoned as Residential Suburban.
- 7.11 Further, the acceptance by Ms Rennie that Policy 14.1.1.2 does not mean that the Panel must rezone Papanui South must also be correct. The wording of that particular Policy is not couched in directive terms, rather it refers to supporting the establishment of RMD zones to meet demand for housing.

## 8 **ADEQUACY OF VALUATION ANALYSIS TO SUPPORT THE LIKELIHOOD OF REZONING AT PAPANUI**

- 8.1 The Panel has of course already heard substantial evidence on the issue of intensification, in particular for the Residential Stage 1 hearing. All the



evidence concluded that, for a whole host of reasons, delivering medium to high-density residential development is certainly challenging.<sup>5</sup>

- 8.2 A consideration of what areas should be identified for intensification involves a filtering exercise, to adopt the term used by Mr. Schellekens on behalf of the Crown. Mr. Schellekens' high-level evidence provided just such a filtering exercise. Given his particular expertise, this analysis was based on feasibility considerations, as opposed to a planning analysis of locational factors.
- 8.3 A particularly important factor identified in Mr. Schellekens' evidence was the extent of on-site capitalisation which would make acquisition for redevelopment non-viable. On that, Mr. Schellekens was of the opinion that if the value of improvements on an otherwise developable site exceeded 25% (later adjusted by agreement with Dr. Fairgray to 27.5%) of the capital values, this would directly impact on and strain already challenging development economics.
- 8.4 Mr. Schellekens' evidence included a number of area specific case studies for, amongst others, Riccarton and Papanui.
- 8.5 As to Papanui, he first commented on its demographics<sup>6</sup>:

#### ***Characteristics of Papanui***

*Despite being only 2kms further away from the CBD than Riccarton, Papanui has a significantly different demographic profile. According to the 2013 census, the median age is 42.0 years (compared to 38.6 years in Christchurch City). 20.1% of people in Papanui are aged 65 years and over, compared with 15.0% in Christchurch City.*

*Couples with children make up 44.2% of all families in Papanui, (compared to 39.8% of all families Christchurch City) and 67.3% of households own their dwelling compared to 64.8% in Christchurch City.*

*These statistics imply materially fewer renters than in Riccarton, and an older and more family dominated market. This drives a different demand which is more likely to support lower density townhouse typologies. In relative terms, standalone dwellings on their own sites will be preferred in this market.*

*The sales data I have analysed supports this conclusion. Since Sept 2012, there have been no sales of new multi-unit developments and significant subdivisions in Papanui. Of the 10 sales recorded of buildings built after 2010,*

<sup>5</sup> See, for example evidence of Mr. Schellekens at para 4.9 : " I conclude in the CBRE Report that there are many challenges associated with medium to high density residential development feasibility reflecting a complex matrix of issues associated with land cost, construction costs and market acceptability of built product.

<sup>6</sup> Appendix JBJS3 of Evidence of John Schellekens at page 44



*all were developed on individual freehold vacant lots. The average lot size was 485sqms implying an achieved density of 20.6h/ha. The average sale price for each stand-alone dwelling was \$691,000 incl. GST and the average floor area was 185sqms.*

- 8.6 This was followed by an analysis of 10 newly constructed dwellings in Papanui, Mr. Schellekens concluding that the available data for Papanui *...does highlight the challenge of feasibly building even freestanding homes (for which there is strong demand) in already established locations where land is scarce prices [sic] accordingly<sup>7</sup>.*

- 8.7 Mr. Mitchell, another witness for the Crown, referred to the need to consult with the development community. He also emphasised the apparent futility of zoning areas as RMD unless this was in locations that could be profitably developed:

*MR MITCHELL: Well in that context no, it does not, because I suppose I am looking at it from the point of view of if you actually want intensification to occur you have to ensure it is in locations where developers can make a profit. So if the developers cannot make a profit they will not go there and they will not build anything. So you can have all the RMD zone you want in locations spread across the city, but unless you put it in locations which can be profitably developed, nothing is going to happen.<sup>8</sup>*

- 8.8 The above evidence indicates, firstly, that from an economic feasibility perspective Papanui South is likely to be too challenging economically to be considered as an appropriate candidate for RMD zoning. Mr. Schellekens evidence is effectively saying that there is no market demand for intensified development in Papanui; the demographics show a dominance of a family market and there are feasibility challenges associated with the high land values within this area.
- 8.9 Secondly, it is submitted that in assessing the appropriateness or otherwise of Papanui South, there has been a failure to date to engage with development community in order to identify locations that can be profitably developed to use Mr. Mitchell's words.
- 8.10 Finally, nowhere in the evidence of Mr. Blake is there any explicit regard paid to the key factor of on-site capitalisation of land i.e whether the ratio of value of improvements is more or less than the 27.5% figure agreed by Fairgray and Schellekens. This factor should have been readily ascertainable. Its absence represents a significant gap in the evidence.

<sup>7</sup> Evidence of John Schellekens at paragraph 17.11

<sup>8</sup> Residential Stage 1 Transcript at 353

9 **BELATED NATURE OF THE EVIDENCE RECEIVED ON THE VALUES OF PAPANUI SOUTH**

9.1 During the hearing, the Panel Chair commented on a number of occasions regarding the belated nature of evidence in respect of the values of Papanui South.

9.2 For example:

*SJH: Ms Scott, I indicated earlier that we had never heard any of this history until we got to this Hearing. Has any consideration been given to some effigies as long as they align with the objectives and policies we must give effect to with these sorts of areas?*

*It seems to me that some of this has arisen by the insistence that heritage and character get split apart and treated separately which I still struggle – can some consideration be given to this? Because if we had been told all of this right at residential one, only speaking for myself, I am not quite sure we would have been here about this area today.*

9.3 The Papanui Residents agree with the sentiment expressed by the Chair that had earlier consideration being given to the values of the Papanui South, the extent of potential RMD zoning for Papanui is likely to have been reduced to take into account the particular values and characteristics of the area.<sup>9</sup>

9.4 In terms of the reference to "effigies" in the transcript, this is interpreted as suggesting some form of identification of the values associated with Papanui South in the Replacement Plan.

9.5 The Panel has already made a decision on the St James Avenue Character Area, a decision which was open to it on the evidence available at the time of the Residential Stage 1 hearing, albeit in hindsight it is clear the evidence leading to this decision was far from complete.

9.6 It is submitted that, notwithstanding this earlier decision, it remains open to the Panel to nevertheless exclude Papanui South from RMD zoning on the basis of its recognised values. This would align with the higher order Objective 6.2.3 of Chapter 6 and Objective 3.3.7 (b).

9.7 A residual question, and one which is open to interpretation, is whether for the purposes of Objective 3.3.7 (b) these values must be already identified in the Replacement Plan before a decision is made as to whether or not a particular form of zoning is more appropriate?

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<sup>9</sup> I am informed by my clients that evidence on the war memorial nature of a number of the streets in Papanui South was made available during the earlier consultation exercise which Council undertook prior to the notification of Residential Stage 1.

- 9.8 There can be no argument that the uncontested values of the Papanui South area have been identified in real terms. More particularly, they have been identified in the evidence now before you, which in turn forms part of your s 32AA analysis. It is submitted accordingly that where areas with special characteristics are identified as part of this analysis, this is sufficient for the purposes of Objective 3.3.7 (b).
- 9.9 Moreover, the ultimate obligation of the Panel is to make a decision that accords with Part II of the Act, a decision that engages the provisions of section 7 in respect of maintenance of amenity values and the quality of the environment.
- 9.10 It remains open for the Panel to direct that a further additional proposal be notified to enable the specific identification of Papanui South as a character area. Equally, the Council could initiate the same on its own initiative. Neither step is however necessary should the Panel simply decide to retain the Residential Suburban Zone as originally notified for the area in Stage 1: Residential. At a later date, the Council could then choose to undertake a plan change exercise to further enhance the protection of the values of Papanui.

#### 10 **THE ALTERNATIVE MAP - MEASURING THE 800M CRITERION FROM LANGDONS ROAD**

- 10.1 At the request of His Honour, Judge Hassan, the Council has prepared and circulated an updated map identifying Langdons Road as the centre point for measuring the 800m criterion under Policy 14.1. The Papanui Residents agree that this is a more logical starting point given that it is adjacent to Northlands Mall.
- 10.2 If the Panel's decision is to rezone part of Papanui South as RMD (which is opposed), the Papanui Residents partially support this alternative map. They request the following changes:
- (a) Exclusion of the portion of St James Avenue. This small front section of the street shown in the map prepared by the Council is where the ANZAC Parade has always traditionally begun and contains the trees planted as memorial in 1947;
  - (b) The areas of Dormer and Perry Street should also be removed out of respect for their war memorial status;
  - (c) The area shown as including Watford Street should be removed. It would represent an isolated and small RMD area and would not lead to a cohesive zoning; and
  - (d) Bellevue Avenue between St James Avenue and the railway underpass should be removed as it would represent an inconsistent and isolated RMD.

10.3 A map identifying the above requested changes is attached to these Submissions.

**11 THE APPROPRIATENESS OF THE 11 HEIGHT OVERLAY SOUGHT BY HOUSING NEW ZEALAND**

11.1 It is submitted that HNZ has not established a compelling case that an 11 metre height limit is necessary in order to achieve the 30 households/per hectare density average set out in Policy 6.3.7(4)(b) of Chapter 6 RPS for intensification development outside the Central City.

11.2 Appendix B to Ms Oliver's evidence gave the perfect example of Riccarton where densities in the order of 40 households per hectare have been achieved even with an 8m height limit.

11.3 It is submitted that common sense would indicate that the primary planning tool for achieving the specified density would invariably be minimum allotment size, which in the case of the RMD zoning is specified as 200m<sup>2</sup>. Simple mathematics applied, it is submitted that this creates the potential for a household/per hectare average that is well in excess of 30, even accounting for other built form standards such as setbacks and access.

11.4 The Papanui Residents consider that if the Panel's decision is to rezone Papanui South as RMD (which is opposed), an 8m height limit would be a more appropriate method of achieving the objectives and policies, when considered in the round. An 8m height limit would more appropriately recognise and provide for the special characteristics of the Papanui South area.

11.5 In respect of Papanui South, the Papanui Residents do not support Ms Oliver's suggested alternative of an 11 metre height limit for sites in excess of 1500m<sup>2</sup>, as buildings of this scale would be incongruous with the values of Papanui South. Further, the evidence regarding existing allotment size indicates that this height bonus would apply to very few, if any, sites. The height bonus would therefore be futile absent amalgamation of sites.

11.6 If minded, it is of course open to the Panel to have a mixed overlay for Papanui with areas other than Papanui South having a higher 11 metre height limit.

G J Cleary

On behalf of the Papanui Residents

15 July 2016





# CHRISTCHURCH REPLACEMENT DISTRICT PLAN

## HEARINGS ON THE RESIDENTIAL CHAPTER 14 PROPOSAL – ADDITIONAL RESIDENTIAL MEDIUM DENSITY AREAS FOR PAPANUI

Shirley/Papanui Community Board      Submission RMD 61

### STATEMENT OF EVIDENCE OF MIKE DAVIDSON, CHAIR, ON BEHALF OF THE SHIRLEY/PAPANUI COMMUNITY BOARD.

15 JUNE 2016

#### Relief Sought

The Shirley/Papanui Community Board requests that the three Residential Medium Density zones identified within the Papanui area of Chapter 14 of the Proposed District Plan be removed from the Proposed District Plan and that the zoning of these areas remain as it is within the existing District Plan.

#### Reasons

The Shirley/Papanui Community Board wishes to support the submissions from the community that noted:

- The special character of St James Avenue (Special Amenity Area, SAM 16)
- St James Avenue as a green belt along with St James Park
- Loss of tree cover and reduction in vegetation due to increased section coverage
- The historical significance of heritage architecture and war memorial trees in St James Avenue and links to St James Church
- A substantial portion of St James Avenue is a 'Floor level and Fill Management Area' (Natural Hazard Planning Map 24, Stage 3) where Dudley Creek crosses St James Avenue.
- Increased on-street parking demand on streets in Papanui, especially those within walking distance of Northlands Mall

The Shirley/Papanui Community Board (SPCB) wishes to support the following points from Statements of Evidence.

#### 1. Likelihood of Development

The SPCB supports the points noted in the Statement of Evidence (William Blake on behalf of CCC) on Valuations the RMD zone in Papanui is already substantially developed with existing



housing that has a remaining economic life. The houses and flats within this area represent the highest and best use of the land. The end price received for any development of this land would probably not justify the removal of demolition of existing improvements.

The Papanui area has few vacant sections or properties with dilapidated buildings.

The analysis supplied in the Valuations evidence shows that only 7% of Papanui South West (10 properties), 15% of Papanui North (25 properties) and 3% of Papanui South East (5 properties) is likely or very likely to be redeveloped.

In all, only 40 properties were identified as likely or very likely to be developed. It should also be noted that in all of the areas identified above there has been some intensification already with some larger sections already subdivided and new houses or units built.

The SPCDB notes that this type of development is already allowed for the current Council District Plan.

2. **Papanui West (Northlands area)**

The SPCB supports the exemption from the RMD zone of properties affected by the 200-year floodplain (as listed in the Statement of Evidence on Urban Design by Josephine Schroder on behalf of CCC) due to the filling and development of these properties affecting other low-lying properties in the area.

The SPCB also supports the exemption of the Papanui West (from the Urban Design Evidence) from the proposed RMD zoning and notes the number of submissions asking for St James Avenue and surrounding streets to the west be exempted due to their amenity value and character.

3. **Papanui South East (West of Papanui Road)**

The SPCB notes that further investigation is needed to determine which parts of this area would benefit from a RMD zone e.g. Papanui Road. Areas such as the east side of Papanui Road with a special character (small bungalows in garden settings) should retain their existing zoning (Statement of Evidence Urban Design by Josephine Schroder on behalf of CCC and Statement of Evidence Planning by Sarah-Jane Oliver on behalf of CCC).

**Papanui South West (East of Papanui Road)**

The SPCB agrees that this is an area with a defined character of bungalows in garden settings and street tree plantings and to retain these qualities the proposed RMD zoning should be rejected and the existing RSZ and RSDT zonings should be retained (Statement of Evidence Urban Design by Josephine Schroder on behalf of CCC).

#### 4. Parking Issues

The SPCB notes the number of requests made from the community for the changing of all-day parking on residential streets in Papanui to a mixture of all-day parking and 120 minute parking due to the unavailability of parking on the residential streets due to parking by workers at nearby businesses including:

- Papanui Cluster area - installation of 12 areas of P120 parking and 4 sections of no stopping
- Matsons Ave - installation of 3 areas of P120 parking and no stopping at the intersection
- Sawyers Arms Road - removal of P30 parking opposite Couplands Bakery
- Shearer Street - Installation of 2 sections of P120 parking and no stopping at the end of the road to provide a turning area
- Blair Avenue - Installation of No stopping at the end of the road to provide a turning area
- Sails Street - Out for consultation for the installation of 2 P120 parking areas
- St James Ave - Soon will be out for consultation on the installation of 3 P120 parking areas.

Any increase in housing intensification within the Papanui area will result in an increase in demand for on-street parking.

#### In Conclusion

The SPCB rejects the RMD proposal to rezone large areas of Papanui to an RMD zone. This blanket approach does not allow for the careful consideration of areas of special amenity and character (e.g. St James Avenue) and their exemption from the RMD zoning.

The Board also notes that the existing District Plan zoning in Papanui allows some intensification as the opportunity arises and given the figures above showing the low likelihood of properties being available for redevelopment this existing zoning is appropriate.

**I wish to speak at the hearing in support of this Statement.**

**Signed**



**Mike Davidson**

**Chair, Shirley/Papanui Community Board**

**16 June 2016**



**THE INDEPENDENT HEARING PANEL  
AT CHRISTCHURCH**

**UNDER**

The Resource Management Act 1991 and  
the Canterbury Earthquake (Christchurch  
Replacement District Plan (Order 2014

**IN THE MATTER OF**

of the Residential Chapter 14 proposal -  
Additional residential Medium Density areas  
for Linwood (Eastgate), Hornby, Papanui  
(Northlands)

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**EXPERT EVIDENCE OF DR MURRAY WILLIAMS**

DATED THIS 13<sup>TH</sup> DAY OF JUNE 2016  
16

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## Executive Summary

- My belief is that the current proposal to change the zoning of specified areas in Papanui, specifically South West Papanui and South East Papanui from Residential Suburban to Medium Density will change the nature of these areas, a process that will be irreversible.
- These areas contain well maintained exemplars of built heritage ranging from the classic square houses of the late 1890s to *circa* 1905, the bay villas of the period *circa* 1910-1916, the Californian bungalows of the 1920s, the English bungalows of the 1930s and the more individual modern architectural designs over the last 20 years.
- The loss of these buildings would destroy much of the rich character that makes Papanui such a popular suburb. Character, in this context means the presence of distinctive qualities that make it worthwhile to preserve these examples of built heritage for the appreciation and edification of present and future generations.
- The proposal will also have a negative effect on four memorial streets that currently contribute to the historical context for the area.

## Specific Plan provision to which evidence relates:

Residential Chapter 14 proposal - Additional residential Medium Density areas for Linwood (Eastgate), Hornby, Papanui (Northlands)

## Expert qualifications

1. I believe I have the background necessary to establish that I have expertise with regards to the above issue.
2. Most of my life has been spent living in or on the fringes of Papanui. I was educated at Paparoa Street Primary and Papanui High School.
3. I have been a member of the Papanui Heritage Group since 2006 and Chairman since 2015. This group has a strong focus on the researching and publication of matters of local historical interest.
4. I have written three booklets published by the PHG, two on historic houses in Papanui and one on the changes to the structure of local government in the area. I also write a monthly column in the *Nor'west News* featuring items of general historical interest. I have recently completed *Timber Town to City*



*Suburb: an illustrated history of Papanui*, the first general history written about this suburb. Publication date is September 2016.

5. I have an academic interest in architectural history and hold two post graduate degrees in Art History from the University of Canterbury BA (Hons) and a Ph.D. both specialising in architectural history. I also hold the degree of MA (Hons) in History.

#### **Expert Evidence Comments**

6. In accordance with the Code of Conduct as relates to Expert Witnesses, section 7 - Environment Court of New Zealand: Practice Note 2014 I make the following comments. The ambit of the evidence given is within my expertise. The data and information and facts have been obtained from research I have undertaken as set out above. My assumptions are based on that information. I have not omitted to consider material facts known to me that might alter or detract from my evidence. The literature I rely on is based on my own extensive booklets and research. In obtaining information I have visited the affected streets, obtained relevant photographs. I was contacted by Mrs Howley of the St James Residents Association to volunteer to provide this opinion.

#### **Evidence**

7. My observations of the evidence are:
  - a. St James Avenue is the key street in the area designated as South West Papanui that runs west of the northern railway line (south of St James' Park) to Windermere Road. St James Avenue predates the development of St James' Park but provides an ideal south-western frame for this popular amenity that was established in 1924.
  - b. The street retains some excellent examples of square houses, so termed for their square or, more accurately, rectangular footprint. These dwellings were constructed of timber with a corrugated iron roof and featured verandas trimmed with cast iron 'fretwork'. The central front



door led off the veranda to a passage way that bisected the house. Examples can be seen at numbers 73 and 97. **Exhibit 1 & Exhibit 2**

- c. Bay villas featured tall gables accentuated with timber shingles or weatherboard panel work and were also constructed of timber with corrugated iron roofs. Builders of these houses used plan books that featured a large number of subtle variations on the basic model. This allowed for some differentiation in presentation based on the generic design. The best examples are at numbers 74 and 109. **Exhibit 3 & Exhibit 4**
- d. Inter-war bungalows are also represented in this street. The vernacular materials, timber and corrugated iron were still in evidence. The Californian style featured a gabled roof and retained the use of timber cladding highlighted by the use of wooden shingles. These houses featured deep porches that were attractive and functional and the previous fixation that the front door should always face the street was relaxed in some versions. Again, differentiation was achieved the by use of plan books. **Exhibit 5 & Exhibit 6**
- e. The lower profile English bungalow of the 1930s featured a hipped roof system rather than gables and distinctive fenestration with liberal use of box windows of varying sizes. **Exhibit 7**
- f. St James Avenue also features modern houses constructed from the 1980s to the present day. Some of these have referenced the vernacular building materials and they have been designed to complement the existing housing stock in the neighbourhood without descending to slavish imitation. **Exhibit 8**
- g. St James Avenue is already recognised as a Special Amenity Area on the CCC Plan. New work should reflect the character of the street and includes a requirement to consider placement of garages, types of fences and set back from the road.

- h. Windermere Road also dates to the 1880s and also includes an eclectic mix of housing styles, some dating from the late twentieth century. There are some examples of post-earthquake construction. However there are still examples of inter-war bungalows and one superb example of a transitional villa at number 101 that was probably built in the late nineteenth century.
- i. An especially interesting feature of this street is the site once occupied by Loreto College (1930-78) a preparatory school for boys who continued their education at St Bede's College. The school was associated with a convent staffed by the Sisters of Mercy, a well-known teaching order. Some of this site is now occupied by the Te Ora Hou Trust but evidence of the original buildings of this complex still exists, for example, the villa that was used as the convent and a timber chapel which features Gothic fenestration and an apse. **Exhibit 9.**
- j. The second area of concern in Papanui is designated as South East Papanui. It is broadly delineated by the south side of Blighs Road from the railway to Rayburn Avenue and includes blocks on both sides of Papanui Road along a southern boundary broadly defined by Hawthorne Street and Paparoa Street.
- k. The segment to the east of Papanui Road is impressive for its array of inter-war bungalows in streets developed in the 1920s, especially Perry and Dormer Streets and Rayburn Avenue. In most cases, these houses have been superbly maintained and when modified have been altered sensitively. Examples are the English bungalow and its Californian precursor at numbers 33 and 28 Dormer Street respectively. **Exhibit 10.** In the few cases, when there has been redevelopment, sound architectural design has resulted in referencing the existing style of the neighbourhood an indication of the extent to which property owners value the existing character of the street. **Exhibit 11**

- l. The west side of Papanui Road, the south side of Blighs Road and the northern most block of Watford Street include a range of styles popular over the last 140 years and are generally well maintained. The buildings on the south side of Blighs Road provide a counterpoint to two impressive art-deco houses on the north side of this street. (NB the north side of this street is not in the area recommended for re-classification)
- m. Immediately after World War Two, a movement led by individual members of the Papanui community and the RSA, lobbied for the introduction of a unique type of memorial to those who had made the ultimate sacrifice. The concept was that a selection of Papanui streets would be planted in kerb-side trees so that they would effectively become living memorials. Eventually 15 streets were chosen, each of them marked by a bronze plaque.
- n. The scope and nature of this scheme is certainly unique to Christchurch and it was an effective way to beautify the suburb while suggesting themes of reflection and regeneration. Four of these streets, Dormer and Perry Streets, St James Avenue and Windermere Road are part of this memorial and it is obvious that the trees could be affected by the proposed change in residential density. It is likely some of these trees could be removed to cater for access to the smaller lots permitted under the re-zoning. In my opinion, if this were to occur, it would amount to a gesture of disrespect for those killed in the war analogous to demolishing a memorial statue or obelisk.
- o. The plaque on St James Avenue, a street planted in scarlet oaks in 1947 from the corner of Harewood Road to the point where the street turns south. **Exhibit 12.** Approximately 20% of these trees would be under threat if the recommendation were to be accepted.
- p. Windermere Road was planted with Fraxinus Ornus (ash) in 1947. Most of these trees would be at risk with the exception of the south



east portion of the street that terminates just north of the intersection of St James Avenue and a short part of the west side of the street at the intersection with Dalriada Street. Dormer Street was planted in Liquid Amber and Acer Saccharinum (Maple) in 1947. All the trees in this street would be under threat. Perry Street was planted with Ginkgo and Quercus Lusitanica (a species of oak) 1945-47, the western portion of this street down to the intersection with Rayburn Avenue would be under threat. (Evidence of original planting from CCC Minutes 1947, Bk 4)

**Summary.**

8. Approving the recommendation would result in the eventual loss of built heritage created over a period of 130 years. This would negatively affect the character of significant areas of Papanui.
9. The only other part of this suburb that fulfilled a similar function was the original 'Horner block', i.e. the streets bounded by Horner and Proctor Streets and Grants and Papanui Roads. Since the turn of this century, developers have begun to transform this area into one dominated by infill housing, small apartments and town houses. It seems fair to assume that the remaining original character of that precinct will soon be obliterated and this underlines the importance of retaining the areas that have been recommended for a change in zoning.
10. The diversity of houses and streetscapes of these neighbourhoods offer the opportunity to present and future citizens to appreciate that architectural history is a route to learning about wider social change, a process reinforced by the existence of the memorial streets. The re-zoning of these areas would result in the increasing blandness and homogenisation of a suburb that is as old as the city of Christchurch itself.



Dr Murray Williams

16/6/16.

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Date

F:\wp\PT\DN0340d2.doc

M.Williams/exhibits to support submission re Papanui to the IHP/July 2016

Photographs: by Graeme Keeley taken Monday 6 June 2016

Exhibit 1



73 St James Ave

Exhibit 2



97 St James Ave



Exhibit 3



74 St James Ave

Exhibit 4



109 St James Ave

Exhibit 5



29 St James Ave

Exhibit 6



63 St James Ave



**Exhibit 7**



41 St James Ave

**Exhibit 8**



66 St James Ave

Exhibit 9



77 Windemere Rd



M.Williams/exhibits to support submission re Papanui to the IHP/July 2016

**Exhibit 10**



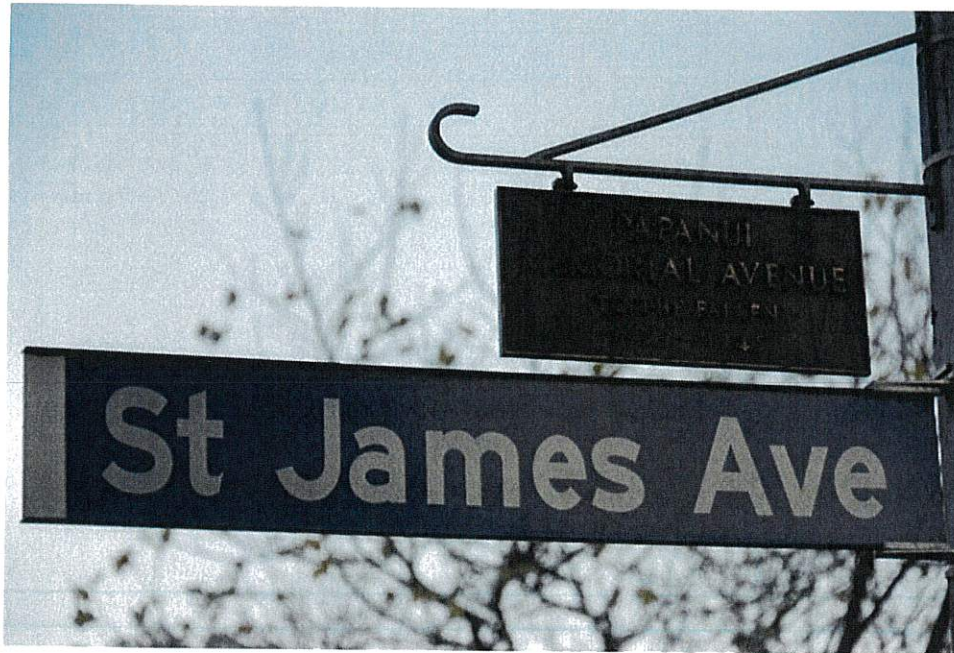
38 Dormer St

**Exhibit 11**



11 Dormer St

Exhibit 12



St James Ave Memorial Plaque



## Our proposed Housing and Business Choice Plan Change (PC14)

### Submitter Details

First name: Philippa Last name: Tucker

Preferred method of contact Email

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

Email: [Redacted]

Daytime Phone: [Redacted]

Age: [Redacted]

Gender: [Redacted]

Ethnicity:

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

Chapter 14 Residential

☒ 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***

I want to apply under chapter 13 and 14.

We live at Windermere Road

We want the War memorial heritage protection for Windermere Road to be extended to the street, housing, trees, plaques incorporating historical significance and architectural aesthetic value as set out in attached submissions.

We do not support any change in density of housing under chapter 14 at all for Windermere Road.

We beleice the standard of protection udner section6(f) RMA should apply.

I want to be heard at the hearing in person.

**My submission is that**

I want to apply under chapter 13 and 14.

We live at Windermere Road

We want the War memorial heritage protection for Windermere Road to be extended to the street, housing, trees, plaques incorporating historical significance and architectural aesthetic value as set out in attached submissions.

We do not support any change in density of housing under chapter 14 at all for Windermere Road.

We beleice the standard of protection udner section6(f) RMA should apply.

I want to be heard at the hearing in person.

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Attached Documents

File
Annexures
Statement
IHP 2

**THE INDEPENDENT HEARING PANEL  
AT CHRISTCHURCH**

**UNDER**

The Resource Management Act 1991 and  
the Canterbury Earthquake (Christchurch  
Replacement District Plan (Order 2014

**IN THE MATTER OF**

of the Residential Chapter 14 proposal -  
Additional residential Medium Density areas  
for Linwood (Eastgate), Hornby, Papanui  
(Northlands)

**SUBMITTER**

**MS PK TUCKER & DR CS WINEFIELD**

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**STATEMENT OF EVIDENCE OF PK TUCKER/CS WINEFIELD**

DATED THIS DAY 15<sup>TH</sup> DAY JUNE 2016

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### **Executive Summary**

1. Our property is out of the consultation zone -not "(ii) within 800 metres walkable distance of each of the facilities identified in Police 14.1.1.2(a) of the Decision Version".
2. The character of our home and our street is not suitable for RMD due to its character and amenity and open space quality
3. Redevelopment is likely to be piecemeal and sporadic based on the nature of our community
4. There are good close cheaper viable alternatives.

### **Specific Plan provision to which submission relates:**

Residential Chapter 14 proposal - Additional residential Medium Density areas for Linwood (Eastgate), Hornby, Papanui (Northlands)

### **Relief sought:**

That no change is made to the residential zoning of Papanui (Northlands) area that is subject to this proposal

### **Reasons**

#### **Policy**

1. We refer to paragraph 4.3 to 4.6 of the Evidence of Ms Oliver and in particular the requirement at 4.3 that the basis for notified RMD was that "(ii) within 800 metres walkable distance of each of the facilities identified in Police 14.1.1.2(a) of the Decision Version". By Google Maps our home 1.7 kilometres from "Northlands Mall" and in our view therefore outside the consultation area as that facility is outside the 800m radius.

#### **Character**

2. We refer to paragraph 3.1 (d) of the Evidence of Ms Schroeder dated 9 June 2016. RMD is not supported on the basis of:  
  
"the disjointed resultant urban form and the presence of character values that have been previously identified through a character assessment and are supported by submitters."
3. At paragraphs 9.2 and 9.3 Ms Schroeder sets out that there is recognisable "character and amenity" within the area including Windermere road. She confirms within Windermere Road there are a number of mature trees and "open space quality".
4. Applying this to our evidence our home is on the original section, setback from the street, with a tree lined front border with mature trees Our neighbours have mature trees as well which enhance our enjoyment of the property. (**Exhibit A**).

5. We have a Cherry Blossom half way down our drive right on the neighbours boundary - it is a mature tree of many years (**Exhibit B**). We all enjoy the beautiful tree during its seasonal cycle. It would not survive medium density housing development close to the boundary. We were advised post earthquake the roots would travel well under both houses and therefore it was secure and not in danger of falling over. The process of digging up the section next door would kill it in my view.
6. We have a significant elm tree in the backyard. (**Exhibit C**). It is proximate to the left side boundary and the rear of the section. If either St James or Windermere boundaries were to redevelop with the scale of earthworks required to implement a full medium density development the tree would likely die. Its roots must span under all 3 sections for a significant distance. The view from our balcony over the rear section is such that you can see through the back yard a vista of trees right through to St James Park. (**Exhibit D**) The open feel was a factor in purchasing the property. The monarch butterflies populate our section - probably from the St James park trees (usually holding thousands of butterflies each season).
7. The street trees provide unique character as a living war memorial. This will be discussed in other briefs but of relevance to our situation, our children attend Waimairi School (Tillman Avenue). The principle has explained to the assembly the importance of the trees and the memorial nature in the 2014 centenary celebrations as I am told by my eldest aged 11. I have seen the children often undertake significant research around ANZAC issues. Our children are aware of the significance of the trees and the plaque on our street. They are aware of the significance of the memorial rose garden in St James park and attend the Anzac parade leaving from there. St James Avenue is shut for the occasion. We have seen many other Windermere school families at these ANZAC parades. The living memorial is therefore being passed down the generations.
8. Windermere Home, retirement village, is a quiet addition to our street. The villas are inhabited post earthquake. The residents' villas have a large grass setback - many have small cottage or basket gardens. It is a quiet safe place for them to live. Increased housing density along with increased population, traffic, and associated issues may impact on their quiet enjoyment.

#### **Valuation evidence**

9. We refer paragraph 4.1 and 4.2 of the evidence of the evidence of Mr Blake dated 9 June 2016. Factors regarding properties being made available include that many residents locate to specific properties to establish a home for non financial reasons - such owners being unlikely to be motivated by financial gain. Investment in the properties is a factor against moving, and density of housing is not necessarily linked to increased value.



10. We refer to Ms Oliver's evidence at paragraph 7.4 as to rate of change and her concern even if zoned RMD "some notified areas/streets may only see very sporadic and scattered multiunit redevelopment over a long period (ie 20 years or longer)". Applying this to the properties in Windermere Road we know a number are owned by families with school age children who attend Waimairi School, then Heaton or Cobham intermediate. We have met at least 8 families within our children's narrow 2 year age band covering primary and intermediate school choices (9 - 11 yrs) in our street. Our decision was influenced by school locality rather simply economic gain. The result is a settled community in that respect. Unless there is a dramatic turn of events we are unlikely to shift during schooling years. It is then proximate to the university.
11. Regarding improvements - we have upgraded our property post earthquake particularly in terms of driveways and path, interior painting and exterior painting and roof maintenance. Our then neighbours at number 58 took the opportunity to substantially redevelop the interior living area and external deck. Two properties further to the left towards Blighs Road are building extensions. These families have pre school children. Given the investment they are unlikely to move.
12. Density and value - our home would qualify as 'well maintained family bungalow, 50 to 60 years old, on an average sized street amongst a group of similar residences" thus in terms of paragraph 4.14 (c) of Mr Blake's evidence - "very unlikely" to be redeveloped. It is a weather board/brick 1965 1 ½ storey home, developed and extended in 1983, renovated in 2004 ish.
13. We chose the area in part as it was a desirable street. The appearance and quality of the housing stock was appealing. In our view the area is 'improving' in quality. With the high level of infilling in Merivale and Fendalton, it is one of the few areas where a family home and family section, likely to improve in value, remain available without exorbitant cost. It is our view the value of our property will improve without development as it becomes a rare commodity - a true family home in a nice community. The increase in rateable value has been dramatic since we purchased 6 years ago, with a substantial increase in market value of around a 30% in terms of purchase price and potential sale price.
14. Referring to the graph at paragraph 6.9 of Mr Blake's evidence, with such a high proportion of unlikely and highly unlikely (50%) and on 7% as very likely or likely there may be an adverse impact of land banking. The other impact with such a low percentage may be sporadic development.
15. We note the concerns in Ms Oliver's evidence at paragraph 7.3 and 7.10 of slow or sporadic development - with "fewer opportunities in Papanui South East and South West for redevelopment the outcome with the adverse impact on the neighbourhood character." The trend in Auckland is for the investors to flock to cheaper suburbs (**Exhibit E**). Applying this to



our home and our understanding of our neighbours properties, this concern could apply.

16. As set out in paragraph 4.12 of Mr Blake's evidence - development is more likely to occur with large parcels of land. As set out in Ms Olliver's evidence at paragraph 3.4:-

"It is my opinion that other areas around Papanui are better suited for comprehensive redevelopments, these being the principle types of developments sought in a RMD zone."

17. Applying this to the immediate vicinity of Northlands, for example Housing New Zealand have a large holding in northern Papanui, in the streets very close to Langdons Road and Northlands - much closer than Windermere Road. Google maps places our home 1.7 kilometres to "Northlands Mall" and places those streets closer - Primrose Street 1.6km, Oaklands Street 1.4km, Morrison Avenue 1.5km, Hoani Street 1.2km, Chapel Street 800metres. The Housing New Zealand ownership component is high:

- a. Primrose Street - 44 titles - 16 Housing New Zealand
- b. Oakland Street - 37 titles - 22 Housing New Zealand
- c. Morrison Avenue - 66 titles - 11 Housing new Zealand, 3 CCC
- d. Hoani Street -100 titles - 35 Housing New Zealand, 1 rest home, 4 consecutive titles owned by two people, 2 sets of 2 consecutive titles by a group, multiple titles owned by companies or due to solicitor involvement and multiple owners - likely trusts. (Exhibit C) Perhaps evidence of land banking given proximate redevelopment on Langdons Road?

18. The Housing New Zealand section size is large on the above titles, many in consecutive ownership. The majority between 600 - 800 sq metres. In terms of development the value of a sample is dramatically lower than our Windermere Road property. Taking valuations from two properties in each street owned by Housing New Zealand the average value is around \$280,000 for 600-750 sq m sections, (**Exhibit F**) compared to \$590,000 for our 766sq m property. I do not know the details but I believe that the policy is already in place to develop Housing New Zealand houses on large sections into multiple units.


19. Referring to Ms Oliver's evidence at paragraph 3.4 - effective affordable development requires scale. A development such as Doncaster Developments Limited in Rangiora for example - ended 140-160 houses to provide affordable social housing. (**Exhibit G**) The Housing New Zealand holdings provide more scope for block development particularly by Housing New Zealand and a chance to provide affordable housing - unlikely if a comparatively expensive property is developed. The LURP housing Fact Sheet 2 highlights the need for affordable housing. (**Exhibit H**)


20. There has been recent development in Windermere Road - the properties next to Te Ora Hau - a set of nice new single storey, reasonably high density homes between Condell Ave and Windermere Road. This is in keeping with the nature of the area and is unobtrusive to the character of the street.

**11 metre height limit**

21. 11 metre vs 8 metre height limit - we do not agree with the proposal to change the zoning of southwest Papanui, including Windermere Road but should the proposal be accepted, we disagree with the 11 metre height limit. We consider the Christchurch City Council ("CCC") consulted us on the basis of an 8 metre height limit. We refer to the grounds filed in our Memorandum to the Hearing Panel.
22. We refer to paragraph 5.3 of the evidence of Mr Jolly dated 9 June 2016 and the specific concern of the potential abrupt change in both building height and boundary set backs between new development and adjacent existing single storey houses.
23. Applying this, our home is 1 ½ storey. It would be dramatically effected if an 11 metre building with limited set back was erected on any of our boundaries. At the front it would mean overlooking the front lawn area of our home and kitchen, at the back, it would compromise privacy substantially and limit activities freely undertaken in the backyard due to close proximity of houses. The left hand side of our property is reasonably close to a boundary fence and the cooler side of the house. An 11 metre building would over shadow our home substantially, making the side bedroom extremely dark and uninhabitable.
24. We also refer to Ms Ollvier's evidence at paragraph 7.36 - redevelopment in Papanui south is likely to be slow (7.10) . As set out above our evidence is of a stable community, improving housing quality and reasons beyond financial motivation to stay. The impact of RMD on our street would therefore be unlikely to meet the present need and therefore in our view be an unnecessary step. The change of zone by itself would have an adverse impact on the decisions to stay or purchase in the area.

Dated this 15<sup>th</sup> day of June 2016

  
\_\_\_\_\_  
PK Tucker

PR   
\_\_\_\_\_  
CS Winefield







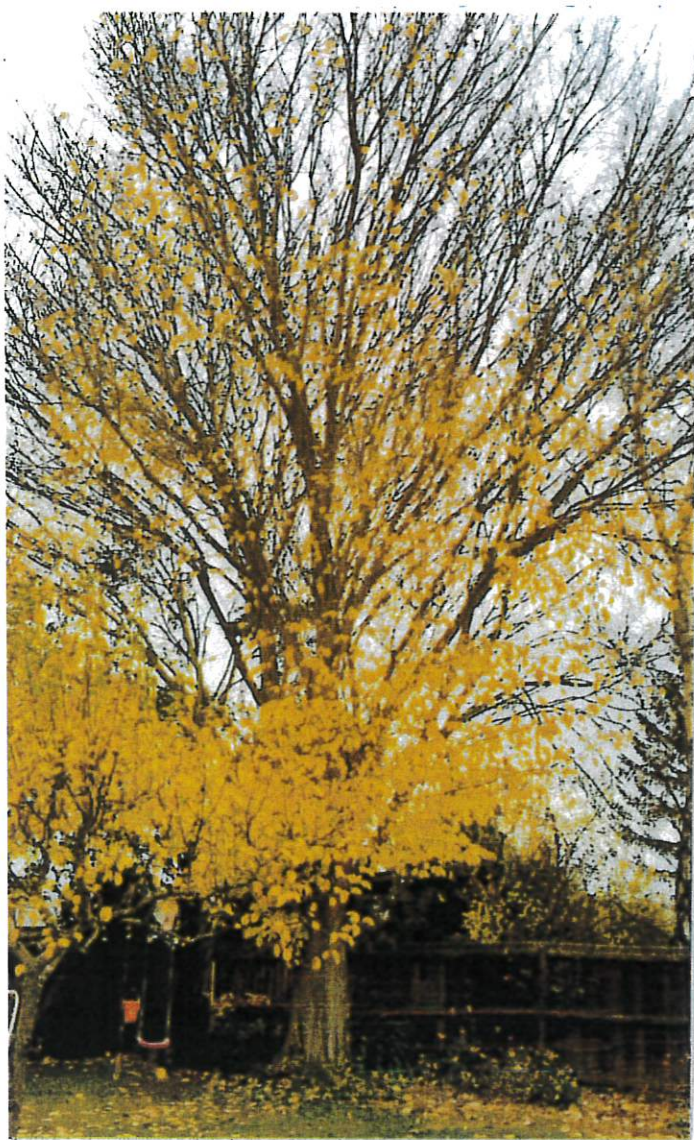


Exhibit D - St James Park view



# Property

Acknowledgments.....	B6
Administration.....	B9
Adult Entertainment.....	B10
Adult Massage.....	B10
Adult Vacancies.....	B9
Appliances (White ware).....	B10
Auctions.....	B10
Auctions Livestock/Plant.....	B10
Building Supplies.....	B10
Business Opportunities.....	C7
Business Services.....	B11
Businesses for Sale.....	C7
Caravans and Trailers.....	B10
Cars for Sale.....	B10
Cars under \$5000.....	B10
Cars Wanted.....	B10
Commercial & Industrial.....	C7-C10
Commercial Vehicles.....	B10
Deaths.....	B6
Educational Vacancies.....	B9
Engineering & Science.....	B9
Entertainment.....	B7
Escorts.....	B10
Financial.....	B10
Firewood.....	B10
Flatmates Wanted.....	C4
Funeral Directors.....	B6
Gardening, Plants.....	B10
Government.....	B9
Health Appointments.....	B9
Hospitality & Tourism.....	B9
In Memoriam.....	B6
Key Appointments.....	B8
Livestock.....	B10
Media/Entertainment.....	B9
Motoring Parts.....	B10
New Homes & Showhomes.....	C4-C5
Personal.....	B10

## Investors flock to cheaper 'burbs

**Some Auckland rents can't cover an investment home buyer's costs - so they're broadening their scope, writes Susan Edmunds**

Property investors searching for yield are flocking to cheaper Auckland suburbs.

Data from University of Auckland property lecturer Michael Rehm and PhD student Ozgur Yildirim shows that in the first half of 2015, investors made up a significant proportion of South Auckland sales.

Eighty per cent of sales in Otara were to investors, up from 62 per cent in 2010.

That was followed by nearby Manurewa North, where 68 per cent of sales were to investors.

Apartments were also popular. Just over 80 per cent of Newmarket unit and apartment sales were to landlords in the same period. Across Auckland, investors were responsible for 54 per cent of all sales in the first half of last year, up from 43 per cent in 2010.

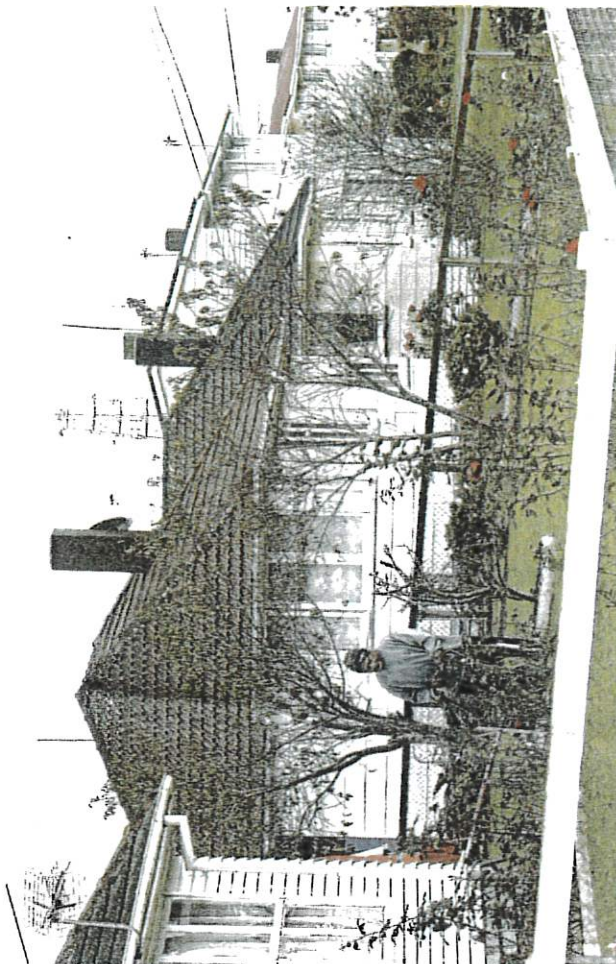
Sales to investors have been under scrutiny for some time. The Reserve Bank estimates that across Auckland, investors accounted for about 40 per cent of all residential purchases in 2015.

It has emphasised its concerns about high levels of investor participation in the market and the impact that could have on financial stability.

Rehm said he knew there would be some differences between suburbs. But he had been surprised by the level of investor activity in places such as Otara.

**"In general it's homeowners who get emotionally attached and are more likely to put in a silly bid."**

David Whitburn  
Fuzo Property



Cheaper suburbs such as Otara offer investors better yields. Rents are not high enough in other suburbs to cover the cost of servicing the mortgage on a house in many parts of the city.

The statistic did not indicate that 80 per cent of all properties were owned by landlords - rather that 80 per cent of the turnover was going to them.

He said some could be investors selling to investors.

The median price of freestanding homes purchased by investors was \$695,000, whereas the median for owner-occupiers was \$610,000, Rehm found.

For apartments and units, the median prices for investor and owner-occupant buyers were \$470,000 and \$555,000, respectively.

David Whitburn, of Fuzo Property and former president of the Auckland Property Investors Association, said investors were driven to cheaper suburbs such as Otara looking for yield.

Rents are not high enough in other suburbs to cover the cost of servicing the mortgage on a house in many parts of the city.

Barfoot & Thompson data shows the Auckland average sale price is \$871,843 and the average rent \$512 a week. That gives a rental yield of 3.06 per cent before costs are taken into account.

guess is they are probably having an effect [on house prices]."

But Whitburn said the extent that investors would compete against home owners was limited because most investors would have a set price they were willing to go to. They would not be able to make the deal work on higher prices.

"In general it's homeowners who get emotionally attached and are more likely to put in a silly bid."

He said investors had become more active in general over recent years as banks became more willing to lend to them.

Rehm said if there was a debt-to-income ratio introduced, it would have a significant impact on investor activity.

He said he was doing work that indicated that few investors were making a good return after their costs were taken out of the equation.

He said claims that investors were not buying for capital gain were disingenuous.

"If property prices are falling, would they still invest?"



CT	Owner	Status	Potentially Maori Land	Legal Description	Indicative Area	Land District	Timeshare Week
205274	Cassandra Philippa Daly, Michael Robt	Live		Lot 1 Deposited Plan 350111	0.0466	Canterbury	
205275	Hong Zhang, Zhigang Song	Live		Lot 2 Deposited Plan 350111	0.0581	Canterbury	
CB12B/389	Amber Mary Pahl-Parkyn, Brian Norma	Live		Lot 1 Deposited Plan 18786	0.0774	Canterbury	
CB12B/390	Charlie George Pakira Hunia, Leigh St	Live		Lot 2 Deposited Plan 18786	0.0652	Canterbury	
CB12B/392	Peter David Davies	Live		Lot 4 Deposited Plan 18786	0.0622	Canterbury	
CB12B/394	Glen Michael Andrew	Live		Lot 6 Deposited Plan 18786	0.0650	Canterbury	
CB12B/396	Housing New Zealand Limited	Live		Lot 8 Deposited Plan 18786	0.0652	Canterbury	
CB12B/397	Alice Tumbokon Oquendo, Luther Diag	Live		Lot 9 Deposited Plan 18786	0.0677	Canterbury	
CB25K/1169	Kathryn Ann Bunton	Live		Lot 75 Deposited Plan 17738	0.0705	Canterbury	
CB29K/1139	Baldyn Joseph Waaka	Live		Lot 82 Deposited Plan 17738	0.0710	Canterbury	
CB30B/467	Mitchell William Kedde, Sarah Jayne A	Live		Lot 64 Deposited Plan 17738	0.0677	Canterbury	
CB30B/889	Alice Tumbokon Oquendo, Luther Diag	Live		Lot 3 Deposited Plan 18786	0.0622	Canterbury	
CB30K/1209	Trevor William Tait	Live		Lot 83 Deposited Plan 17738	0.0786	Canterbury	
CB32B/1022	Rowan John Moss, Sonya May Pinnel	Live		Lot 71 Deposited Plan 17738	0.0806	Canterbury	
CB36B/330	Neketini Limited	Live		Lot 7 Deposited Plan 18786	0.0650	Canterbury	
CB37A/427	Ida Clancy, Wallace George Clancy	Live		Lot 5 Deposited Plan 18786	0.0650	Canterbury	
CB44B/1219	Housing New Zealand Limited	Live		Lot 4 Deposited Plan 77426	0.0697	Canterbury	
CB44B/1220	Housing New Zealand Limited	Live		Lot 5 Deposited Plan 77426	0.0592	Canterbury	
CB44B/1221	Housing New Zealand Limited	Live		Lot 6 Deposited Plan 77426	0.0477	Canterbury	
CB44B/1222	Housing New Zealand Limited	Live		Lot 7 Deposited Plan 77426	0.0471	Canterbury	
CB44B/1223	Housing New Zealand Limited	Live		Lot 8 Deposited Plan 77426	0.0613	Canterbury	
CB4B/853	Aven Roy Placid	Live		Lot 62 Deposited Plan 17738	0.0693	Canterbury	
CB4B/854	Housing New Zealand Limited	Live		Lot 63 Deposited Plan 17738	0.0663	Canterbury	
CB4B/859	Housing New Zealand Limited	Live		Lot 68 Deposited Plan 17738	0.0850	Canterbury	
CB4B/860	Housing New Zealand Limited	Live		Lot 69 Deposited Plan 17738	0.0797	Canterbury	
CB4B/861	Housing New Zealand Limited	Live		Lot 70 Deposited Plan 17738	0.0703	Canterbury	
CB4B/863	Bruce Graham Leigh, Denise Claudett	Live		Lot 72 Deposited Plan 17738	0.0807	Canterbury	
CB4B/864	Housing New Zealand Limited	Live		Lot 73 Deposited Plan 17738	0.0658	Canterbury	
CB4B/865	Angela Maree Boskell, Brendon Leona	Live		Lot 74 Deposited Plan 17738	0.0764	Canterbury	
CB4B/867	Housing New Zealand Limited	Live		Lot 76 Deposited Plan 17738	0.0706	Canterbury	
CB4B/870	Housing New Zealand Limited	Live		Lot 79 Deposited Plan 17738	0.0794	Canterbury	
CB4B/871	Emma Gwen Bennett, Jonathan Jamel	Live		Lot 80 Deposited Plan 17738	0.0792	Canterbury	
CB4B/872	Desmond Patrick McDonald, Margaret	Live		Lot 81 Deposited Plan 17738	0.0711	Canterbury	
CB4B/875	Gary Thomas Gillard	Live		Lot 84 Deposited Plan 17738	0.0706	Canterbury	
CB4B/876	Adrienne Carol Longley	Live		Lot 85 Deposited Plan 17738	0.0703	Canterbury	
CB4B/877	Housing New Zealand Limited	Live		Lot 86 Deposited Plan 17738	0.0792	Canterbury	
CB4B/878	Miaoqun Wu, Weisheng Qu	Live		Lot 87 Deposited Plan 17738	0.0746	Canterbury	
CB4B/879	Housing New Zealand Limited	Live		Lot 88 Deposited Plan 17738	0.0696	Canterbury	
CB4B/880	Kristian Reyes Carson	Live		Lot 89 Deposited Plan 17738	0.0696	Canterbury	
CB4B/881	Prom Chhom Uy, Tin Yi Theng	Live		Lot 90 Deposited Plan 17738	0.0658	Canterbury	
CB7C/1377	Housing New Zealand Limited	Live		Lot 5 Deposited Plan 24876	0.0645	Canterbury	
CB7C/1378	Housing New Zealand Limited	Live		Lot 6 Deposited Plan 24876	0.0650	Canterbury	

Primrose Street



## Property Information

<b>Property address</b>	9 PRIMROSE ST, PAPANUI
<b>Legal description</b>	Lot 8 DP 77426
<b>Property area (hectares)</b>	
<b>Valuation number</b>	21921 28600
<b>Differential category</b>	Residential

Rating valuation as valued on 1/11/2013\*

Land value	\$165,000
+ Value of improvements	\$90,000
<b>= Capital value</b>	<b>\$255,000</b>

Latest Property area (hectares)	0.0618
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### Rates information

<b>Rate account number</b>	73131864
<b>Current rating year</b>	2015/2016
<b>Current year's rates</b>	\$1,587.30
<b>Current year rates instalments</b>	Instalment 1: \$396.77 Instalment 2: \$396.77 Instalment 3: \$396.77 Instalment 4: \$396.99
<b>Previous year's rates</b>	\$1,488.64

**\* Your rates will be based on this valuation until 30 June 2016.**

**Up-to-date valuations:** Amended valuations, as a result of new improvements to a property or settled objections, may not show on our website for up to 3 weeks.

## Property Information

<b>Property address</b>	5 PRIMROSE ST, PAPANUI
<b>Legal description</b>	Lot 63 DP 17738, RS 314
<b>Property area (hectares)</b>	
<b>Valuation number</b>	21921 28800
<b>Differential category</b>	Residential

### Rating valuation as valued on 1/11/2013\*

Land value	\$180,000
+ Value of improvements	\$90,000
<b>= Capital value</b>	<b>\$270,000</b>
Latest Property area (hectares)	0.0663

### Rates information

<b>Rate account number</b>	73153957
<b>Current rating year</b>	2015/2016
<b>Current year's rates</b>	\$1,662.59
<b>Current year rates instalments</b>	Instalment 1: \$415.59 Instalment 2: \$415.59 Instalment 3: \$415.59 Instalment 4: \$415.82
<b>Previous year's rates</b>	\$1,558.00

**\* Your rates will be based on this valuation until 30 June 2016.**

**Up-to-date valuations:** Amended valuations, as a result of new improvements to a property or settled objections, may not show on our website for up to 3 weeks.

CT	Owner	Status	Potentially Maori Land	Legal Description	Indicative Area	Land District	Timeshare Week
CB23B/810	Housing New Zealand Limited	Live		Lot 2 Deposited Plan 19437	0.0725	Canterbury	
CB23B/811	Wouming Xu, Yu Quan Xu	Live		Lot 3 Deposited Plan 19437	0.0725	Canterbury	
CB23B/812	Faleaoga Mulifusi Leota, Mafafa Leota	Live		Lot 4 Deposited Plan 19437	0.0748	Canterbury	
CB23B/813	Faleaoga Mulifusi Leota, Mafafa Leota	Live		Lot 5 Deposited Plan 19437	0.0682	Canterbury	
CB23B/814	Housing New Zealand Limited	Live		Lot 6 Deposited Plan 19437	0.0662	Canterbury	
CB23B/815	Housing New Zealand Limited	Live		Lot 7 Deposited Plan 19437	0.0710	Canterbury	
CB23B/816	Ernest Allan John Galbraith, Margaret	Live		Lot 8 Deposited Plan 19437	0.0723	Canterbury	
CB23B/817	Benjamin Robert Green, Melisa Jayne	Live		Lot 9 Deposited Plan 19437	0.0710	Canterbury	
CB23B/818	Housing New Zealand Limited	Live		Lot 10 Deposited Plan 19437	0.0647	Canterbury	
CB26F/651	Diane Enid Wilson	Live		Lot 1 Deposited Plan 19437	0.0650	Canterbury	
CB27A/106	Malinda Seiha Ouk	Live		Lot 124 Deposited Plan 17738	0.0713	Canterbury	
CB33B/187	Yan Qi Shen	Live		Lot 11 Deposited Plan 55889	0.0515	Canterbury	
CB39D/37	Housing New Zealand Limited	Live		Lot 96 Deposited Plan 17738	0.0786	Canterbury	
CB40D/922	Allan Bruce Finnie	Live		Lot 121 Deposited Plan 17738, Flat 1 Deposited Plan 56331 and	0.0698	Canterbury	
CB40D/923	Janine Anne Thompson, Jarrod Mark	Live		Lot 121 Deposited Plan 17738, Flat 2 Deposited Plan 70418 and	0.0698	Canterbury	
CB4B/852	Housing New Zealand Limited	Live		Lot 61 Deposited Plan 17738	0.0792	Canterbury	
CB4B/882	Housing New Zealand Limited	Live		Lot 92 Deposited Plan 17738	0.0797	Canterbury	
CB4B/883	Housing New Zealand Limited	Live		Lot 93 Deposited Plan 17738	0.0766	Canterbury	
CB4B/884	Chunshui Hu, Hexiang Peng	Live		Lot 94 Deposited Plan 17738	0.0660	Canterbury	
CB4B/885	Housing New Zealand Limited	Live		Lot 95 Deposited Plan 17738	0.0711	Canterbury	
CB4B/887	Anna Rowena Romero, Roland Orfred	Live		Lot 97 Deposited Plan 17738	0.0708	Canterbury	
CB4B/888	Housing New Zealand Limited	Live		Lot 98 Deposited Plan 17738	0.0784	Canterbury	
CB4B/889	Housing New Zealand Limited	Live		Lot 99 Deposited Plan 17738	0.0706	Canterbury	
CB4B/890	Housing New Zealand limited	Live		Lot 110 Deposited Plan 17738	0.0673	Canterbury	
CB4B/891	Housing New Zealand Limited	Live		Lot 111 Deposited Plan 17738 - <i>Valuation attached</i>	0.0749	Canterbury	
CB4B/892	Housing New Zealand Limited	Live		Lot 112 Deposited Plan 17738	0.0673	Canterbury	
CB4B/893	Housing New Zealand Limited	Live		Lot 113 Deposited Plan 17738 - <i>Valuation attached</i>	0.0749	Canterbury	
CB4B/894	Housing New Zealand Limited	Live		Lot 114 Deposited Plan 17738	0.0673	Canterbury	
CB4B/895	Housing New Zealand Limited	Live		Lot 115 Deposited Plan 17738	0.0625	Canterbury	
CB4B/896	Darcy James Menzies Nicolson, Pene	Live		Lot 116 Deposited Plan 17738	0.0625	Canterbury	
CB4B/897	Keogh Hill Investments Limited	Live		Lot 117 Deposited Plan 17738	0.0625	Canterbury	
CB4B/898	Prestigious Property Enterprise Limited	Live		Lot 118 Deposited Plan 17738	0.0625	Canterbury	
CB4B/899	Housing New Zealand Limited	Live		Lot 119 Deposited Plan 17738	0.0688	Canterbury	
CB4B/900	Xiao Liang Liu	Live		Lot 120 Deposited Plan 17738	0.0726	Canterbury	
CB4B/902	Housing New Zealand Limited	Live		Lot 122 Deposited Plan 17738	0.0685	Canterbury	
CB4B/903	Housing New Zealand Limited	Live		Lot 123 Deposited Plan 17738	0.0688	Canterbury	
CB4B/906	Housing New Zealand Limited	Live		Lot 2 Deposited Plan 20670	0.0744	Canterbury	

Oakland Street



## Property Information

<b>Property address</b>	26 OAKLAND ST, PAPANUI
<b>Legal description</b>	Lot 113 DP 17738, RS 314
<b>Property area (hectares)</b>	
<b>Valuation number</b>	21921 22900
<b>Differential category</b>	Residential

### Rating valuation as valued on 1/11/2013\*

Land value	\$190,000
+ Value of improvements	\$95,000
<b>= Capital value</b>	<b>\$285,000</b>

Latest Property area (hectares)	0.0749
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### Rates information

<b>Rate account number</b>	73132310
<b>Current rating year</b>	2015/2016
<b>Current year's rates</b>	\$1,737.89
<b>Current year rates instalments</b>	Instalment 1: \$434.40 Instalment 2: \$434.40 Instalment 3: \$434.40 Instalment 4: \$434.69
<b>Previous year's rates</b>	\$1,627.39

**\* Your rates will be based on this valuation until 30 June 2016.**

**Up-to-date valuations:** Amended valuations, as a result of new improvements to a property or settled objections, may not show on our website for up to 3 weeks.

CT	Owner	Status	Potentially Maori Land	Legal Description	Indicative Area	Land District	Timeshare Week
117532	Christchurch City Council	Live		Lot 1 Deposited Plan 328776	0.0564	Canterbury	
383420	Soon Investments Limited	Live		Lot 1 Deposited Plan 396154	0.0076	Canterbury	
383421	Somi Dayal Gopal	Live		Lot 2 Deposited Plan 396154	0.0076	Canterbury	
446725		Live		Lot 2 Deposited Plan 82372	0.0517	Canterbury	
446796	Karen Amanda Ross	Live		Lot 1 Deposited Plan 412584	0.0450	Canterbury	
446797	Jan Katie Price, Mark Stephen Abraham	Live		Lot 4 Deposited Plan 412584	0.1220	Canterbury	
707145		Live		Lot 28 Deposited Plan 16706		Canterbury	
CB20A/824	Housing New Zealand Limited	Live		Lot 1 Deposited Plan 42228	0.0786	Canterbury	
CB20A/825	Danny Rajendra, Rudy Nicholas Rajer	Live		Lot 2 Deposited Plan 42228	0.0884	Canterbury	
CB22B/439	Housing New Zealand Limited	Live		Lot 10 Deposited Plan 16706	0.0928	Canterbury	
CB22B/444	Bill Reihana, Colleen Ann Sheehan	Live		Lot 17 Deposited Plan 16706	0.0834	Canterbury	
CB22B/445	Hailun Li, Xiaoling Shi	Live		Lot 18 Deposited Plan 16706	0.0834	Canterbury	
CB22B/446	Housing New Zealand Limited	Live		Lot 19 Deposited Plan 16706	0.0834	Canterbury	
CB22B/447	Ernest Kilian	Live		Lot 21 Deposited Plan 16706	0.0834	Canterbury	
CB22B/449	Christchurch City Council	Live		Lot 24 Deposited Plan 16706	0.0829	Canterbury	
CB25K/291	Lisa Jane Hoare, Lyall Fredrick Barrow	Live		Lot 29 Deposited Plan 16706	0.0829	Canterbury	
CB26B/810	Ernest Kilian	Live		Lot 22 Deposited Plan 16706	0.0832	Canterbury	
CB26K/140	Christchurch City Council	Live		Lot 4 Deposited Plan 17078	0.0794	Canterbury	
CB27K/656	Hyoung Mi Jin, Jong Tae Lee	Live		Lot 31 Deposited Plan 16706	0.0829	Canterbury	
CB29A/367	Alistair Colin Stuart	Live		Lot 56 Deposited Plan 17749	0.0612	Canterbury	
CB32F/306	Lynda Elizabeth Rae, Wayne Thomas	Live		Lot 33 Deposited Plan 16706	0.0829	Canterbury	
CB33F/1073	Mark Bruce Lawrence Smail	Live		Lot 20 Deposited Plan 16706, Flat 2 Deposited Plan 57185 and S	0.0835	Canterbury	
CB34A/1220	Kevin Andrew Poll	Live		Lot 35 Deposited Plan 16706, Flat 1 Deposited Plan 57922	0.0898	Canterbury	
CB34A/1221	Nigel Paul Jason Guest	Live		Lot 35 Deposited Plan 16706, Flat 2 Deposited Plan 57922	0.0898	Canterbury	
CB34A/1222	Glenis Dawn Guest	Live		Lot 35 Deposited Plan 16706, Flat 3 Deposited Plan 57922 and G	0.0898	Canterbury	
CB35C/623	Yuan Wan Shan	Live		Lot 20 Deposited Plan 16706, Flat 1 Deposited Plan 60715	0.0835	Canterbury	
CB36A/96	Felicity Ita O'Malley, Stephen John He	Live		Lot 27 Deposited Plan 16706	0.0829	Canterbury	
CB36D/310	Ronald James McTaggart	Live		Lot 11 Deposited Plan 16706, Flat 1 Deposited Plan 62215	0.0834	Canterbury	
CB36D/311	Gaye Leanne Shearer, Michael Patrick	Live		Lot 11 Deposited Plan 16706, Flat 2 Deposited Plan 62215	0.0834	Canterbury	
CB39C/79	Housing New Zealand Limited	Live		Lot 57 Deposited Plan 17749	0.0612	Canterbury	
CB39D/32	Housing New Zealand Limited	Live		Lot 6 Deposited Plan 17749	0.0639	Canterbury	
CB41C/1078	Aaron John Tipene Roberts, Jana Dua	Live		Lot 5 Deposited Plan 17749, Flat 1 Deposited Plan 71914 and Ga	0.0738	Canterbury	
CB41D/49	Gordon James Sarchett, Judy Ann Sa	Live		Lot 12 Deposited Plan 16706	0.0834	Canterbury	
CB42A/655	Kerry Nicholas Balk	Live		Lot 5 Deposited Plan 17749, Flat 2 Deposited Plan 72731 and Po	0.0738	Canterbury	
CB42A/927	Robert James Williams	Live		Lot 30 Deposited Plan 16706, Flat 1 Deposited Plan 72852 and G	0.0829	Canterbury	
CB42A/928	Om Lata Prasad, Surran Prasad	Live		Lot 30 Deposited Plan 16706, Flat 2 Deposited Plan 72852	0.0829	Canterbury	
CB46B/735	TAT Enterprises Limited	Live		Lot 1 Deposited Plan 80784	0.0370	Canterbury	
CB46B/736	Sandra Lesley Thomas	Live		Lot 2 Deposited Plan 80784	0.0460	Canterbury	
CB47B/1233	William Patrick Carroll	Live		Lot 1 Deposited Plan 82186	0.0387	Canterbury	
CB47C/938	Editha Quimbo Flutey	Live		Lot 1 Deposited Plan 82372	0.0501	Canterbury	
CB581/51	Christine Mavis Ormandy	Live		Lot 34 Deposited Plan 16706	0.0830	Canterbury	
CB5A/705	Somi Dayal Gopal	Live		Part Lot 1 Deposited Plan 17541	0.0116	Canterbury	
CB5B/12	Richard John Anthony Hastings, Takal	Live		Lot 7 Deposited Plan 17749	0.0655	Canterbury	
CB5B/13	Housing New Zealand Limited	Live		Lot 8 Deposited Plan 17749	0.0663	Canterbury	
CB5B/14	Justin Israel Anderson, Roriana Mary	Live		Lot 9 Deposited Plan 17749	0.0756	Canterbury	
CB5B/24	A Phong Vorg, Geoffrey Childers Saul	Live		Lot 21 Deposited Plan 17749	0.0804	Canterbury	
CB5B/25	Chia-Chin Lin	Live		Lot 22 Deposited Plan 17749	0.0685	Canterbury	
CB5B/26	Housing New Zealand Limited	Live		Lot 23 Deposited Plan 17749	0.0718	Canterbury	
CB5B/27	Housing New Zealand Limited	Live		Lot 24 Deposited Plan 17749	0.0683	Canterbury	
CB5B/44	Cynthia Kristina Barrett	Live		Lot 44 Deposited Plan 17749	0.0928	Canterbury	
CB5B/46	Helen Rosalie Tyson	Live		Lot 46 Deposited Plan 17749	0.1212	Canterbury	
CB5B/47	Housing New Zealand Limited	Live		Lot 47 Deposited Plan 17749	0.0711	Canterbury	
CB5B/48	Housing New Zealand Limited	Live		Lot 48 Deposited Plan 17749	0.0713	Canterbury	

value attached  
value attached



CT	Owner	Status	Potentially Maori Land	Legal Description	Indicative Area	Land District	Timeshare Week
CB5B/50	Allan James Cassidy, Barbara Jane C	Live		Lot 50 Deposited Plan 17749	0.0754	Canterbury	
CB5B/51	Justine Lee Burt	Live		Lot 51 Deposited Plan 17749	0.0716	Canterbury	
CB5B/52	Christine Anne Reihana, Sonny Matika	Live		Lot 52 Deposited Plan 17749	0.0741	Canterbury	
CB5B/53	Housing New Zealand Limited	Live		Lot 53 Deposited Plan 17749	0.0779	Canterbury	
CB5B/55	Daniel Charles Thomas, Frances Rad	Live		Lot 55 Deposited Plan 17749	0.0706	Canterbury	
CB5B/60	Shane Isobel Herriot	Live		Lot 2 Deposited Plan 20428	0.0766	Canterbury	
CB5C/549	Richard William Walker	Live		Lot 26 Deposited Plan 16706	0.0830	Canterbury	
CB672/82	Norman Frederick Clark, Nyla Olga Cl	Live		Lot 43 Deposited Plan 17749	0.0680	Canterbury	
CB672/92	David Anderson Tait, Lorna Beryl Gard	Live		Lot 42 Deposited Plan 17749	0.0673	Canterbury	
CB696/10	B&D and B&J Limited	Part-Cancel		Lot 4-5 Deposited Plan 17541	0.0218	Canterbury	
CB737/3	B&D and B&J Limited	Part-Cancel		Lot 6 Deposited Plan 17541	0.0192	Canterbury	
CB784/58	Chi-Ju Lee, Chi-Yun Lee	Live		Lot 3 Deposited Plan 17381	0.0612	Canterbury	



## Property Information

<b>Property address</b>	30 OAKLAND ST, PAPANUI
<b>Legal description</b>	Lot 111 DP 17738, RS 314
<b>Property area (hectares)</b>	
<b>Valuation number</b>	21921 23100
<b>Differential category</b>	Residential

## Rating valuation as valued on 1/11/2013\*

Land value	\$190,000
+ Value of improvements	\$80,000
<b>= Capital value</b>	<b>\$270,000</b>

Latest Property area (hectares)	0.0749
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## Rates information

<b>Rate account number</b>	73154490
<b>Current rating year</b>	2015/2016
<b>Current year's rates</b>	\$1,662.59
<b>Current year rates instalments</b>	Instalment 1: \$415.59 Instalment 2: \$415.59 Instalment 3: \$415.59 Instalment 4: \$415.82
<b>Previous year's rates</b>	\$1,558.00

**\* Your rates will be based on this valuation until 30 June 2016.**

**Up-to-date valuations:** Amended valuations, as a result of new improvements to a property or settled objections, may not show on our website for up to 3 weeks.

## Property Information

<b>Property address</b>	42 MORRISON AVE, PAPANUI
<b>Legal description</b>	Lot 24 DP 17749, RS 112
<b>Property area (hectares)</b>	
<b>Valuation number</b>	21921 18100
<b>Differential category</b>	Residential

### Rating valuation as valued on 1/11/2013\*

Land value	\$180,000
+ Value of improvements	\$95,000
<b>= Capital value</b>	<b>\$275,000</b>

Latest Property area (hectares)	0.0683
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### Rates information

<b>Rate account number</b>	73154542
<b>Current rating year</b>	2015/2016
<b>Current year's rates</b>	\$1,687.68
<b>Current year rates instalments</b>	Instalment 1: \$421.88 Instalment 2: \$421.88 Instalment 3: \$421.88 Instalment 4: \$422.04
<b>Previous year's rates</b>	\$1,581.12

**\* Your rates will be based on this valuation until 30 June 2016.**

**Up-to-date valuations:** Amended valuations, as a result of new improvements to a property or settled objections, may not show on our website for up to 3 weeks.

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## Property Information

<b>Property address</b>	44 MORRISON AVE, PAPANUI
<b>Legal description</b>	Lot 23 DP 17749, RS 112
<b>Property area (hectares)</b>	
<b>Valuation number</b>	21921 18200
<b>Differential category</b>	Residential

## Rating valuation as valued on 1/11/2013\*

Land value	\$180,000
+ Value of improvements	\$100,000
<b>= Capital value</b>	<b>\$280,000</b>

Latest Property area (hectares)	0.0718
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## Rates information

<b>Rate account number</b>	73132327
<b>Current rating year</b>	2015/2016
<b>Current year's rates</b>	\$1,712.78
<b>Current year rates instalments</b>	Instalment 1: \$428.15 Instalment 2: \$428.15 Instalment 3: \$428.15 Instalment 4: \$428.33
<b>Previous year's rates</b>	\$1,604.25

**\* Your rates will be based on this valuation until 30 June 2016.**

**Up-to-date valuations:** Amended valuations, as a result of new improvements to a property or settled objections, may not show on our website for up to 3 weeks.



CT	Owner	Status	Potentially Maori Land	Legal Description	Indicative Area	Land District	Timeshare Week
CB358B/84	Housing New Zealand Limited	Live		Lot 2 Deposited Plan 357937	0.0453	Canterbury	
CB358B/85	Housing New Zealand Limited	Live		Lot 3 Deposited Plan 357937	0.0513	Canterbury	
CB358B/86	Celia Melgazo Pura, John Lindsay W	Live		Lot 1 Deposited Plan 411117	0.0450	Canterbury	
CB358B/87	Guang Jie Zhang, Hui Zhang	Live		Lot 3 Deposited Plan 417423	0.0487	Canterbury	
CB358B/88	Housing New Zealand Limited	Live		Lot 1 Deposited Plan 419973	0.0389	Canterbury	
CB358B/89	Housing New Zealand Limited	Live		Lot 2 Deposited Plan 419973	0.0352	Canterbury	
CB358B/90	Housing New Zealand Limited	Live		Lot 3 Deposited Plan 419973	0.0463	Canterbury	
CB358B/91	John Douglas Tooby	Live		Lot 2 Deposited Plan 420988	0.8383	Canterbury	
CB358B/92		Live		Lot 2 Deposited Plan 417423	0.0517	Canterbury	
CB358B/93	Golden Age Retirement Village Limited	Live		Lot 1 Deposited Plan 473883	1.0568	Canterbury	
CB358B/94	Geoffrey Maxwell Haywood, Tatiana A	Live		Lot 11 Deposited Plan 16540	0.0711	Canterbury	
CB358B/95	Iain Grant Fyfe, Jethro Malcolm Robin	Live		Lot 23 Deposited Plan 16540	0.0779	Canterbury	
CB358B/96	Dawn Margaret McLaughlan, Garry Pe	Live		Lot 9 Deposited Plan 16540	0.0698	Canterbury	
CB358B/97	Barbara Johns	Live		Lot 30 Deposited Plan 587	0.0769	Canterbury	
CB358B/98	Jeremy Jack Pickles	Live		Lot 4 Deposited Plan 16858	0.0918	Canterbury	
CB358B/99	Blockhouse Bay Trustee Limited	Live		Lot 31 Deposited Plan 587, Flat 1 Deposited Plan 56471	0.0976	Canterbury	
CB358B/100	Malcolm Lutton, Pamela Margaret Lutt	Live		Lot 31 Deposited Plan 587, Flat 2 Deposited Plan 56471	0.0976	Canterbury	
CB358B/101	Anneliese Jagau, Hans Jagau	Live		Lot 1 Deposited Plan 36934, Flat 1 Deposited Plan 54023	0.0455	Canterbury	
CB358B/102	Anneliese Jagau, Hans Jagau	Live		Lot 1 Deposited Plan 36934, Flat 2 Deposited Plan 54023	0.0455	Canterbury	
CB358B/103	Anneliese Jagau, Hans Jagau	Live		Lot 2 Deposited Plan 36934, Flat 3 Deposited Plan 54024	0.0627	Canterbury	
CB358B/104	Anneliese Jagau, Hans Jagau	Live		Lot 2 Deposited Plan 36934, Flat 4 Deposited Plan 54024	0.0627	Canterbury	
CB358B/105	Melody-Ann Cole, Michael Craig Cole	Live		Lot 12 Deposited Plan 13886, Flat 1 Deposited Plan 58630 and G	0.0875	Canterbury	
CB358B/106	Son Thanh Bui	Live		Lot 12 Deposited Plan 13886, Flat 2 Deposited Plan 58630	0.0875	Canterbury	
CB358B/107	Jeffrey David Lamb, Misako Lamb	Live		Lot 29 Deposited Plan 17738	0.0708	Canterbury	
CB358B/108	Nicol and Company Limited	Live		Lot 11 Deposited Plan 13886, Flat 1 Deposited Plan 60180 and G	0.0878	Canterbury	
CB358B/109	Margot Lee White, Richard Dean Clap	Live		Lot 11 Deposited Plan 13886, Flat 2 Deposited Plan 60180	0.0878	Canterbury	
CB358B/110	Leslie Allan Gourdie, Susanne Linda G	Live		Lot 18 Deposited Plan 15090	0.0920	Canterbury	
CB358B/111	Robert Hughburn Newth, Taupuru Ran	Live		Lot 1 Deposited Plan 16858	0.0725	Canterbury	
CB358B/112	Cyril Payne, Jean Maxwell Payne	Live		Lot 10 Deposited Plan 587	0.1012	Canterbury	
CB358B/113	Blockhouse Bay Trustee Limited, Willia	Live		Lot 1 Deposited Plan 61316	0.0453	Canterbury	
CB358B/114	Darren Robert Pierce	Live		Lot 2 Deposited Plan 61316, Flat 1 Deposited Plan 61831	0.0953	Canterbury	
CB358B/115	Debra Jane Mountney	Live		Lot 2 Deposited Plan 61316, Flat 2 Deposited Plan 61831	0.0953	Canterbury	
CB358B/116	Pauline Eleanor McCurrell	Live		Lot 2 Deposited Plan 61316, Flat 3 Deposited Plan 61831	0.0953	Canterbury	
CB358B/117	Housing New Zealand Limited	Live		Lot 1 Deposited Plan 64044	0.0732	Canterbury	
CB358B/118	Housing New Zealand Limited	Live		Lot 2 Deposited Plan 64044	0.0478	Canterbury	
CB358B/119	Housing New Zealand Limited	Live		Lot 3 Deposited Plan 64044	0.3913	Canterbury	
CB358B/120	Amanda Rae Lindebaum, Rory John D	Live		Lot 16 Deposited Plan 17738	0.0779	Canterbury	
CB358B/121	Emma Marie Dewhurst, Shaun Barry G	Live		Lot 2 Deposited Plan 55618	0.0501	Canterbury	
CB358B/122	Housing New Zealand Limited	Live		Lot 3 Deposited Plan 55618	0.0752	Canterbury	
CB358B/123	Erez Damri	Live		Lot 5 Deposited Plan 55618	0.0500	Canterbury	
CB358B/124	Paul Godfrey Burbury, Roger James B	Live		Lot 7 Deposited Plan 8720	0.0526	Canterbury	
CB358B/125	Paul Godfrey Burbury, Roger James B	Live		Lot 5 Deposited Plan 8720	0.0516	Canterbury	
CB358B/126	Catherine Joy Shanks, Charles Peter S	Live		Lot 4 Deposited Plan 8720	0.0511	Canterbury	
CB358B/127	Anatoli Investments Limited	Live		Lot 3 Deposited Plan 8720	0.0506	Canterbury	
CB358B/128	Hayley Rachael Remnant, Matthew Jo	Live		Lot 57 Deposited Plan 16540	0.0683	Canterbury	
CB358B/129	Kee Sing Wong, Siew Yung Chai	Live		Lot 17 Deposited Plan 15090, Flat 1 Deposited Plan 74294 and G	0.0830	Canterbury	
CB358B/130	Housing New Zealand Limited	Live		Lot 3 Deposited Plan 76425	0.0417	Canterbury	
CB358B/131	Housing New Zealand Limited	Live		Lot 4 Deposited Plan 76425	0.0410	Canterbury	
CB358B/132	Housing New Zealand Limited	Live		Lot 5 Deposited Plan 76425	0.0483	Canterbury	
CB358B/133	Ambera Jane Robertson	Live		Lot 17 Deposited Plan 15090, Flat 2 Deposited Plan 77538 and G	0.0830	Canterbury	
CB358B/134	Mikhail Ivanovich Sych	Live		Lot 1 Deposited Plan 55099, Flat 1 Deposited Plan 78753 and G	0.0561	Canterbury	
CB358B/135	Mikhail Ivanovich Sych	Live		Lot 1 Deposited Plan 55099, Flat 2 Deposited Plan 78753, Garage	0.0561	Canterbury	
CB358B/136	David John King, Susanne King	Live		Lot 11 Deposited Plan 587	0.1012	Canterbury	



CT	Owner	Status	Potentially Maori Land	Legal Description	Indicative Area	Land District	Timeshare Week
CB4B/838	Housing New Zealand Limited	Live		Lot 8 Deposited Plan 83496	0.0337	Canterbury	
CB4B/839	Housing New Zealand Limited	Live		Lot 9 Deposited Plan 83496	0.0377	Canterbury	
CB4B/922/278	Allan Gough, Purnell Creighton Trustee	Live		Lot 1 Deposited Plan 12833	0.0607	Canterbury	
CB4B/726	Duncan Richard Clayton, Fern Every	Live		Lot 2 Deposited Plan 16858	0.0997	Canterbury	
CB4B/801	Rotary Trustee Limited, Ung Kim Moh	Live		Lot 9 Deposited Plan 17738	0.0842	Canterbury	
CB4B/802	Anantharajan Kasi Rathnam, Pei-Ling L	Live		Lot 10 Deposited Plan 17738	0.0706	Canterbury	
CB4B/803	Anne Barnes, Robert Charles Barnes	Live		Lot 11 Deposited Plan 17738	0.0744	Canterbury	
CB4B/804	Lise Jane Merritt, Rangimarie Lana De	Live		Lot 12 Deposited Plan 17738	0.0723	Canterbury	
CB4B/805	Benjamin Gerald Carrington, Nicola M	Live		Lot 13 Deposited Plan 17738	0.0731	Canterbury	
CB4B/806	Dale Wellings Priest, Lynette Janice P	Live		Lot 14 Deposited Plan 17738	0.0749	Canterbury	
CB4B/809	Housing New Zealand Limited	Live		Lot 17 Deposited Plan 17738	0.0789	Canterbury	
CB4B/810	Dennise Kathleen Head	Live		Lot 18 Deposited Plan 17738	0.0799	Canterbury	
CB4B/811	Michelle McClelland	Live		Lot 19 Deposited Plan 17738	0.0792	Canterbury	
CB4B/812	Jarrett Trustee Services Limited	Live		Lot 20 Deposited Plan 17738	0.0766	Canterbury	
CB4B/813	Housing New Zealand Limited	Live		Lot 21 Deposited Plan 17738	0.0731	Canterbury	
CB4B/814	Housing New Zealand Limited	Live		Lot 22 Deposited Plan 17738	0.0754	Canterbury	
CB4B/815	Housing New Zealand Limited	Live		Lot 23 Deposited Plan 17738	0.0774	Canterbury	
CB4B/816	Housing New Zealand Limited	Live		Lot 24 Deposited Plan 17738	0.0847	Canterbury	
CB4B/817	Housing New Zealand Limited	Live		Lot 25 Deposited Plan 17738	0.0771	Canterbury	
CB4B/818	Housing New Zealand Limited	Live		Lot 26 Deposited Plan 17738	0.0792	Canterbury	
CB4B/819	Housing New Zealand Limited	Live		Lot 27 Deposited Plan 17738	0.0703	Canterbury	
CB4B/820	Dale Wellings Priest, Lynette Janice P	Live		Lot 28 Deposited Plan 17738	0.0703	Canterbury	
CB4B/822	Housing New Zealand Limited	Live		Lot 30 Deposited Plan 17738	0.0718	Canterbury	
CB4B/823	Housing New Zealand Limited	Live		Lot 31 Deposited Plan 17738	0.0708	Canterbury	
CB4B/824	Housing New Zealand Limited	Live		Lot 32 Deposited Plan 17738	0.0751	Canterbury	
CB4D/565	Jody John Robinson	Live		Lot 19 Deposited Plan 15090	0.0921	Canterbury	
CB4D/567	Kapungui Trustee Limited	Live		Lot 21 Deposited Plan 15090	0.0921	Canterbury	
CB4D/568	Huihe Wu, Ruijie Wu, Songyi Wu	Live		Lot 22 Deposited Plan 15090	0.0921	Canterbury	
CB4D/578	Ning Li, Zhipeng Huang	Live		Lot 4 Deposited Plan 21236	0.0961	Canterbury	
CB5D/379	Xu Ji Li	Live		Lot 38 Deposited Plan 16540	0.0658	Canterbury	
CB5D/580	Housing New Zealand Limited	Live		Lot 8 Deposited Plan 16540	0.0706	Canterbury	
CB5D/582	Heather Lee Bennetts	Live		Lot 10 Deposited Plan 16540	0.0711	Canterbury	
CB5D/583	Housing New Zealand Limited	Live		Lot 12 Deposited Plan 16540	0.0698	Canterbury	
CB5D/584	Housing New Zealand Limited	Live		Lot 13 Deposited Plan 16540	0.0711	Canterbury	
CB5D/588	Housing New Zealand Limited	Live		Lot 22 Deposited Plan 16540	0.0756	Canterbury	
CB5D/590	Housing New Zealand Limited	Live		Lot 24 Deposited Plan 16540	0.0938	Canterbury	
CB5D/591	Housing New Zealand Limited	Live		Lot 25 Deposited Plan 16540	0.0792	Canterbury	
CB5D/592	Housing New Zealand Limited	Live		Lot 26 Deposited Plan 16540	0.0771	Canterbury	
CB5D/599	Xiaoli He	Live		Lot 35 Deposited Plan 16540	0.0830	Canterbury	
CB5D/600	Peter Richard Evans, Vera Elizabeth E	Live		Lot 36 Deposited Plan 16540	0.0708	Canterbury	
CB5D/601	Housing New Zealand Limited	Live		Lot 37 Deposited Plan 16540	0.0708	Canterbury	
CB5D/602	Housing New Zealand Limited	Live		Lot 39 Deposited Plan 16540	0.0706	Canterbury	
CB5D/611	Housing New Zealand Limited	Live		Lot 56 Deposited Plan 16540	0.0782	Canterbury	
CB772/16	Feng Xia Guo	Live		Lot 3 Deposited Plan 16858	0.0688	Canterbury	
CB802/2	Beatrice Gertrude Mayell	Live		Lot 2 Deposited Plan 20548	0.0938	Canterbury	
CB802/3	Max Rate Investments Limited	Live		Lot 1 Deposited Plan 20548	0.0617	Canterbury	



## Property Information

<b>Property address</b>	82 HOANI ST, PAPANUI
<b>Legal description</b>	Lot 8 DP 16540, PT RS 112
<b>Property area (hectares)</b>	
<b>Valuation number</b>	21921 9800
<b>Differential category</b>	Residential

### Rating valuation as valued on 1/11/2013\*

Land value	\$180,000
+ Value of improvements	\$105,000
<b>= Capital value</b>	<b>\$285,000</b>

Latest Property area (hectares)	0.0706
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### Rates information

<b>Rate account number</b>	73154560
<b>Current rating year</b>	2015/2016
<b>Current year's rates</b>	\$1,737.89
<b>Current year rates instalments</b>	Instalment 1: \$434.40 Instalment 2: \$434.40 Instalment 3: \$434.40 Instalment 4: \$434.69
<b>Previous year's rates</b>	\$1,627.39

**\* Your rates will be based on this valuation until 30 June 2016.**

**Up-to-date valuations:** Amended valuations, as a result of new improvements to a property or settled objections, may not show on our website for up to 3 weeks.

## Property Information

<b>Property address</b>	88 HOANI ST, PAPANUI
<b>Legal description</b>	Lot 30 DP 17738, RS 314
<b>Property area (hectares)</b>	
<b>Valuation number</b>	21921 10100
<b>Differential category</b>	Residential

Rating valuation as valued on 1/11/2013\*

Land value	\$180,000
+ Value of improvements	\$90,000
<b>= Capital value</b>	<b>\$270,000</b>

Latest Property area (hectares) 0.0718

## Rates information

<b>Rate account number</b>	73132391
<b>Current rating year</b>	2015/2016
<b>Current year's rates</b>	\$1,662.59
<b>Current year rates instalments</b>	Instalment 1: \$415.59 Instalment 2: \$415.59 Instalment 3: \$415.59 Instalment 4: \$415.82
<b>Previous year's rates</b>	\$1,558.00

**\* Your rates will be based on this valuation until 30 June 2016.**

**Up-to-date valuations:** Amended valuations, as a result of new improvements to a property or settled objections, may not show on our website for up to 3 weeks.

CT	Owner	Status	Potentially Maori Land	Legal Description	Indicative Area	Land District	Timeshare Week
648763	Golden Age Retirement Village Limited	Live		Lot 1 Deposited Plan 473883	1.0568	Canterbury	
CB11K/1447	Umu Limited	Live		Lot 1 Deposited Plan 30282	0.0672	Canterbury	
CB16B/161	Dorothy Beatrice Clarke, Ivan James	Live		Lot 2 Deposited Plan 30282, Flat 1 Deposited Plan 35542 and Ga	0.0913	Canterbury	
CB16B/162	Rachel Vanessa ARMON	Live		Lot 2 Deposited Plan 30282, Flat 2 Deposited Plan 35542 and Ga	0.0913	Canterbury	
CB330/176	Andrew Barry John Thompson, Dorothy	Live		Lot 4 Deposited Plan 5589	0.0296	Canterbury	
CB392/57	The Board of Administration of the Met	Live		Part Rural Section 203	0.4047	Canterbury	
CB416/224	Erin Joy Holmes	Live		Lot 1 Deposited Plan 8720	0.0506	Canterbury	
CB423/284	Katherine Joan Bradley, Marcus Vizza	Live		Lot 2 Deposited Plan 8720	0.0506	Canterbury	
CB632/61	Me Jung Park, Seong Hwan You	Live		Lot 4 Deposited Plan 17555	0.0604	Canterbury	

Chapel Street

## Property Information

<b>Property address</b>	35 CHAPEL ST, PAPANUI
<b>Legal description</b>	Lot 4 DP 17555
<b>Property area (hectares)</b>	
<b>Valuation number</b>	22182 6100
<b>Differential category</b>	Residential

## Rating valuation as valued on 1/11/2013\*

Land value	\$180,000
+ Value of improvements	\$180,000
<b>= Capital value</b>	<b>\$360,000</b>

Latest Property area (hectares)	0.0604
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## Rates information

<b>Rate account number</b>	73114817
<b>Current rating year</b>	2015/2016
<b>Current year's rates</b>	\$2,114.39
<b>Current year rates instalments</b>	Instalment 1: \$528.55 Instalment 2: \$528.55 Instalment 3: \$528.55 Instalment 4: \$528.74
<b>Previous year's rates</b>	\$1,974.26

**\* Your rates will be based on this valuation until 30 June 2016.**

**Up-to-date valuations:** Amended valuations, as a result of new improvements to a property or settled objections, may not show on our website for up to 3 weeks.

## Property Information

<b>Property address</b>	27 CHAPEL ST, PAPANUI
<b>Legal description</b>	Lot 1 DP 8720
<b>Property area (hectares)</b>	
<b>Valuation number</b>	22182 3800
<b>Differential category</b>	Residential

### Rating valuation as valued on 1/11/2013\*

Land value	\$170,000
+ Value of improvements	\$155,000
<b>= Capital value</b>	<b>\$325,000</b>

Latest Property area (hectares)	0.0506
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### Rates information

<b>Rate account number</b>	73114680
<b>Current rating year</b>	2015/2016
<b>Current year's rates</b>	\$1,938.67
<b>Current year rates instalments</b>	Instalment 1: \$484.62 Instalment 2: \$484.62 Instalment 3: \$484.62 Instalment 4: \$484.81
<b>Previous year's rates</b>	\$1,812.35

**\* Your rates will be based on this valuation until 30 June 2016.**

**Up-to-date valuations:** Amended valuations, as a result of new improvements to a property or settled objections, may not show on our website for up to 3 weeks.



## COMMENTS ON THE LAND USE RECOVERY PLAN REVIEW

TO: Environment Canterbury  
Christchurch

By email only: [LURP@ecan.govt.nz](mailto:LURP@ecan.govt.nz)

Name: Doncaster Developments Ltd


Contact Address: PO Box 13-349  
Christchurch

Phone Number: 03 3663729

Email: [watson@sel.kiwi](mailto:watson@sel.kiwi)

Topic Area: Communities and Housing

Dated this 29th day of May 2015.

  
name Kim SANDERS

For Doncaster Developments Ltd

## COMMENTS ON THE LAND USE RECOVERY PLAN REVIEW

### – COMMUNITIES AND HOUSING

#### Introduction

The parties are the owner of approximately 7.8 hectares of land situated at the northern end of Lehmans Road on the north-west edge of Rangiora. The land is zoned for rural-residential development at a permitted density of approximately one house per 5000 square metres (Res 4A zone in the Waimakariri District Plan). It is also subject to the north-west Rangiora Outline Development Plan (District Planning Map 155). The submitter is also the owner and developer of the adjacent residential land in north-west Rangiora, which now includes an area of medium density townhouse development, a shopping centre, pre school, church and off street storage for medium density housing.

The subject land is situated on the east side of Lehmans Road, south of the Rangiora racecourse and north-west of a line of electricity transmission lines. The land is physically well suited to development for housing and can be serviced. Road, pedestrian and cycle connectivity and open space are provided for in the Outline Development Plan.

The circumstances of the land and its suitability for medium density housing has changed since the preparation of the land use recovery plan. The land was previously seen as suitable for rural-residential density being on what was then the periphery of Rangiora and remote from services and amenities. The locality has undergone significant change and the subject land is now situated alongside residential development including medium density housing and generally constrained from becoming ad hoc urban growth by the established boundaries of Lehmans Road and the racecourse. It now links (and is within five minutes walking and cycling distance) of proposed open space, shops, restaurants, preschool, church and the area of medium density residential development and associated support facilities.

#### Consideration

The parties have been aware of the LURP provisions which support and encourage new opportunities for medium density and affordable housing. The parties have also assessed the provisions of the LURP which provide for exemplar housing projects, Action 8. No such projects were identified in the Waimakariri District and the comment is that the proposed land and its circumstances make it an outstanding and appropriate location for such. In particular it can satisfy the expected outcomes or criteria as follows.

**(1) High quality, safe and accessible residential environments that address the neighbourhood context**

The site is generally confined by residential development (medium and standard density) and can integrate well with the north Rangiora community. It is located along the 'urban' boundary but largely exists as part of the Rangiora urban area.

In addition a range of other features and amenities are now being established alongside the subject land.

**(2) Well-built and energy efficient**

The parties have already demonstrated the ability to develop to Home star 6 standards by reference to the medium density development alongside the site (50 affordable houses built or under construction).

**(3) Innovation and comprehensive development**

The land area is large enough to provide a significant contribution to the affordable housing market and can be designed as a comprehensive development of between 140 – 160 dwellings all with linkages to, and as part of the established community. The opportunity will be available for a range of ownership tenures, building styles, materials within neighbourhood communities or groups of 15-20 dwellings at a time.

**(4) Appropriate to the locality**

The site provides an outstanding opportunity to establish and utilise the potential of an area of land which is already a part of the north Rangiora urban community. Development of the land in the manner outlined will support and consolidate the local community and the service based activities either existing or consented for the area. The services (infrastructure) are available and the land is suitable in terms of geotechnical assessment.

**(5) Diversity and Affordability**

The parties have a demonstrated record of developing a range of house and section types and sizes which will deliver

- 2, 3 and 4 bedroom homes across a range of prices
- homes that are comfortable and affordable
- provision for a range of tenures
- a significant percentage of dwellings in the affordable market as set out in the LURP
- an ability to work with the local authority and finance institutions to achieve these outcomes and
- a range of house and land price packages
- 

**(6) Medium Density**

The parties can provide for a range of densities appropriate to the Rangiora residential area and its role as a key Activity Centre, and have already demonstrated that ability with the adjoining and surrounding mixed housing density and community centre development.



**COMMUNITIES AND HOUSING – WHAT MORE NEEDS TO BE DONE:**

The parties to these comments have taken note of the matters raised in the Review Consultation Pamphlet (Communities and Housing). The opportunity identified in these comments will:

- Provide for medium density and affordable housing at a range of sizes to buy or rent
- Can be designed as a comprehensive development integrated into the existing residential community with a high level of connectivity be it pedestrian, cycle or public transport
- Will support establishing community services and facilities in the area, a number of which have been initiated by the submitting parties and supported by the Council, and
- is located on an area of land, the development opportunities for which have changed significantly over the last two years.

The circumstances of the land and the best use thereof represent an opportunity to introduce a number of sustainable and beneficial changes to the Rangiora area. These will support housing opportunity, house affordability and investment in the community, be it local services, expansion of amenities (open space) and a neighbourhood designed around a high level of connectivity for all modes of transport.

The action sought is to work with Environment Canterbury and Waimakariri District Council (and the rest of the partnership) to develop the provisions suitable for the land to be identified for an Exemplar Housing and subdivision brief. This would address all issues from

- House and section sizes
- Servicing and urban design
- Affordability
- Process
- Engagement with all interested authorities and any incentives or instruments of the designated affordable housing units.

The outcome would be the inclusion of the appropriate provision within the LURP when reviewed in August/September 2015.

**Attachments:**

- (1) Site Plans
- (2) Correspondence

Preliminary Draft

# Land Use Recovery Plan

## Te Mahere Whakahaumanu Tāone

FACT SHEET 2

## Housing

Of the approximately 190,000 dwellings in greater Christchurch, around 91% were damaged as a result of the earthquakes. Thousands of houses and sections are either permanently or temporarily uninhabitable, creating a large demand for other existing houses, for rental accommodation, including social housing, and for new sections. The growing rebuild workforce is further increasing demand for housing. Some displaced households are encountering challenging circumstances trying to find affordable houses.

## Housing supply

Housing demand is being met through the construction of new homes, households sharing homes or taking in boarders, residents leaving Christchurch permanently, and purpose-built worker accommodation, and other commercial accommodation.

Under a medium household growth scenario, greater Christchurch will need to accommodate an additional 36,150 households by 2028. The potential Greenfield housing supply (zoned and serviced) during this period is 42,606 Greenfield sections.

This indicates an abundance of Greenfield supply compared with the expected household growth, particularly because some of the household growth is likely to be provided for through infill and higher density housing development.

However, there is a real risk of a significant shortfall of temporary housing for workers and displaced households to 2016/17 as the residential rebuild gathers momentum.

Despite considerable areas of land being zoned for housing and provided with infrastructure, conversion of this land to sections and building of houses is not keeping pace with anticipated demand. There is a need to facilitate delivery of sections and housing through the Land Use Recovery Plan.



## Housing choice

As a result of the earthquakes there has been a reduction in housing types available, particularly medium-density types of housing (such as terraces and townhouses) in the CBD and eastern suburbs. A larger proportion of new housing following the earthquakes is low-density Greenfield development. Incentives will be needed to encourage a range of housing types.



Medium-density housing in existing urban areas, particularly around Key Activity Centres, is an economically efficient form of urban development, utilising existing underground infrastructure, public transport and facilities and services.

There has been a significant loss of more affordable housing, social and rental accommodation. Christchurch City Council and Housing New Zealand own or lease more than 8,500 properties in Christchurch. Ninety-five per cent of these properties were damaged, requiring urgent repairs and replacement.

## Housing quality

Greater Christchurch needs to remain a desirable place to live, work and visit. Vibrant, enjoyable and comfortable living environments will play an important role in the recovery. Examples include infrastructure and development layouts that promote active transport, inbuilt green technologies such as rainwater tanks, solar-water heating and small-scale energy generation, and biodiversity and attractive landscaping.

New and repaired buildings, and the spaces around them, should promote a distinctive sense of character and identity informed by the environment and local history, including cultural heritage and Ngāi Tahu values.

## Challenges for housing

This Recovery Plan and the work arising from it therefore needs to:

- Maintain an overview of Christchurch housing demand and supply
- Increase certainty and reduce risk to shorten decision-making timeframes and reduce costs and prices
- Develop a better understanding of the issues that prevent sufficient supply to the housing market
- Address issues that are not or will not otherwise be addressed by the housing market
- Consider unintended consequences that may arise from decisions or actions that could be taken.

## Responding to the housing challenge

The availability and choice of housing and quality of residential areas, limited or inappropriate housing choices for both permanently and temporarily displaced residents, as well as the temporary workforce, are issues that need resolving through a combination of the 15 responses to the three priorities.

### Priority 5 – Increase housing supply to meet demand.

**R17.** Statutory Direction: Amendment as set out in R1 (see Fact Sheet 1) and District Plan amendments.

**R18.** Statutory Direction: Provide proposed Greenfield land-zoning provisions to the CER Minister in a manner that is aligned with the provision of core public and private infrastructure and services as set out in Annual Plans, Three Year Plans, Long Term Plans and the Canterbury Regional Land Transport Programme.

Selwyn District Outline Development Plan and rezoning provisions for Helpet Park (ODP Area 7), East Maddisons / Goulds Road (ODP Area 10) and Branthwaite Drive (ODP Area 11) to be provided to the CER Minister in 2013.

**R19.** Territorial authorities review existing residential density and development provisions to identify possible impediments to uptake of current intensification opportunities. Recommend process to the CER Minister to amend provisions to facilitate broader uptake of intensified development.

**R20.** Establish a process to work collaboratively with housing developers to identify ways to ensure that the timing of supply of sections matches demand (to address land banking), while ensuring associated public and private core infrastructure is provided as it is needed.

**R21.** Identify suitable government and council-owned land and initiate exemplar projects for redevelopment, especially medium density and/or Brownfield developments, and as a means to incentivise and promote such opportunities to developers and the housing market including through opportunities enabled by associated density provision amendments. This may focus on the 6,000 properties owned and leased by Housing New Zealand, and joint ventures as part of a package to deliver quality social and affordable housing.

### Priority 6 – Increase housing choice to support the recovery.

**R22.** District Councils and CERA to identify and implement methods, in collaboration with developers, that incentivise development of undeveloped land in suitable existing urban areas (such as underwriting development), Infill areas and Greenfield areas (such as plan rules which nullify restrictive covenants), and also consider amending rating policies. This will include assessing the potential for affordable and social housing and the provision of permanent units that can be used for temporary accommodation in the short term.

**R23.** Statutory Direction: District Councils to review (including costs and opportunities) and provide to the CER Minister any changes to development contributions, policies and provisions to incentivise the delivery of a range of housing types in existing urban areas, particularly as part of comprehensive redevelopment of Brownfield land.

**R24.** Complete a housing market assessment (in collaboration with MBIE) to better understand present and future housing market supply and demand, to identify the appropriate mix and diversity of housing provision which will assist the prioritisation of existing zoned land and the consideration of whether to increase the density of suitable land.

**R25.** District Councils to identify and implement programmes through Annual Plans, Long Term Plans and Three Year Plans for public facilities, services and amenity improvements required to enhance redevelopment opportunities around targeted Key Activity Centres.

**R26.** Work in partnership with local and central government, not-for-profit organisations and the private sector to undertake developments (possibly as public/private partnerships and joint venture projects) that demonstrate economically viable and well-designed medium density housing in appropriate suburban locations.

**R27.** Statutory Direction: Provide proposed residential or mixed use District Plan provisions to the CER Minister that enable comprehensive developments in existing urban areas, including Brownfield sites on the basis of their size and/or location. Introduce a 'Floating' Zone for comprehensive redevelopments.

**R28.** Promote cost effective and innovative design, construction and development solutions to enable and support rebuilding.

**R29.** Statutory Direction: Review and, where necessary, amend District Plan policies and rules to provide for housing options on historic Māori Reservations, particularly Māori Reservation 873 (Tuahiwi).

**R30.** Statutory Direction: Review and where necessary provide to the CER Minister amended District Plan policies and rules to provide for housing options on historic Māori Reservations, particularly Māori Reservation 875 (Rāpaki).

#### **Priority 7 – Restore and enhance the quality and sustainability of housing areas.**

**R31.** Review existing guidance on urban design to ensure it provides clear, comprehensive guidance, and then ensure all development and redevelopment of housing considers such urban design that is made available by the local authority.

For more information

Email [lurp@ecan.govt.nz](mailto:lurp@ecan.govt.nz)

or visit [www.developingchoices.org.nz](http://www.developingchoices.org.nz)



**THE INDEPENDENT HEARING PANEL  
AT CHRISTCHURCH**

**UNDER**

The Resource Management Act 1991 and  
the Canterbury Earthquake (Christchurch  
Replacement District Plan (Order 2014

**IN THE MATTER OF**

of the Residential Chapter 14 proposal -  
Additional residential Medium Density areas  
for Linwood (Eastgate), Hornby, Papanui  
(Northlands)

**SUBMITTER**

RMD 76

---

**STATEMENT OF EVIDENCE OF** CATH CHRISTIE

DATED THIS DAY OF 15<sup>th</sup> JUNE 2016

---

1. Executive Summary

*I am opposed to the Residential Chapter 14 proposal.*

2. Specific Plan provision to which submission relates:

- a. Residential Chapter 14 proposal - Additional residential Medium Density areas for Linwood (Eastgate), Hornby, Papanui (Northlands)

3. Relief sought:

- a. that no change is made to the residential zoning of Papanui (Northlands) area that is subject to this proposal

4. Reasons

- (a) *The medium density housing will have a detrimental effect on the community*  
(b) *The amenity value will be lost being the architecture existing & the trees of the area & change of lifestyle*  
(c) *Development will lessen the parking areas diminishing street parking for residents.*

*C. Christie*

Name

Date *15 June 2016*

Attachments

1.  
2.  
3.

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(b) The amenity value will be lost being the architecture existing & the trees of the area & change of lifestyle  
(c) Development will lessen the parking areas diminishing street parking for residents.

C. Christie

Name

Date 15 June 2016

Attachments

1.  
2.  
3.

## CHRISTCHURCH REPLACEMENT DISTRICT PLAN

### HEARINGS ON THE RESIDENTIAL CHAPTER 14 PROPOSAL ADDITIONAL RESIDENTIAL MEDIUM DENSITY AREAS FOR LINWOOD (EASTGATE), HORNBY, PAPANUI (NORTHLANDS)

#### STATEMENT IN SUPPORT OF MARGARET ANN HOWLEY RMD 130

#### PREPARED ON BEHALF OF THE ABOVE SUBMITTER BY SELF,

DATE 15<sup>th</sup> JUNE 2016

**Specific Plan provision to which the submission relates:** *Rezoning of the following areas to a Residential Medium Density (RMD) Zone*

- (a) Papanui – including the whole or parts of the following streets:
- i. (Papanui North) Vagues Road, Meadow Street, Apollo Place, Shearer Avenue and Main North Road;
  - ii. (Papanui South East) Rayburn Avenue, Dormer Street, Perry Street, Paparoa Street, Blighs Road and Watford Street and
  - iii. (Papanui South West) Windermere Road, Dalriada Street, Bellvue Avenue and St James Avenue

**Relief sought:** *We seek the removal of Papanui South-east and Papanui South West from the proposed rezoning to Residential Medium Density and that those areas are then zoned Residential Suburban.*

*: Rezoning of the following areas to a Residential Medium Density (RMD) Zone*

- (a) Papanui – including the whole or parts of the following streets:
- i. (Papanui North) Vagues Road, Meadow Street, Apollo Place, Shearer Avenue and Main North Road;
  - ~~ii. (Papanui South East) Rayburn Avenue, Dormer Street, Perry Street, Paparoa Street, Blighs Road and Watford Street and~~
  - ~~iii. (Papanui South West) Windermere Road, Dalriada Street, Bellvue Avenue and St James Avenue~~

#### Reasons:

1. This area of Papanui has a strong vibrant community with a well-developed local identity and a strong sense of belonging. This gives the residents a strong sense of wellbeing one they take with them and share with others during their daily lives.
2. St James Avenue has a Resident's Association that is active over the wider area of South Papanui and has taken the lead over recent years to protect the community from activity that was causing harm and distress to not only St James Residents but the wider community as well. Other streets in the area maintain email networks that work in with the Residents Association to keep the community informed. The email networks are a quick instant way for residents to communicate, not only for serious issues like this but for the mundane such as lost or found pets.

3. As a community it has developed organisations such as the Papanui Youth Development Trust which works alongside the traditional education system to foster a strong sense of self believe in our young. It aims to give them a strong set of guidelines so they can take their place in any community as fully achieving well rounded young adults that respect the communities within which they live. They do this well.
4. Papanui has residents that have been here for decades as well as young families that have recently moved here. The area is revitalising on its own, there is infill housing taking place at a rate that the community can adapt and adjust to and older housing being upgraded to modern standards to provide warm comfortable homes. The community takes great joy in the young families making their homes with us.
5. Within Papanui there is a network of 15 streets planted with avenues of trees shortly after WWII to form living memorials to the fallen. These trees were planted after the RSA Papanui wrote to the Christchurch City Council requesting this happen. There are 15 streets in all each bearing plaques at each end dedicating them to the fallen of WWII. The main avenue is St James and from here promptly at 9.30am every ANZAC day the Papanui RSA ANZAC Parade marches from the street. People from all areas of Christchurch and overseas visitors line the street as the Parade leaves then fall in after it. The number of citizens that do this is often several thousand.
6. The Memorial Streets in the proposed zone are Windermere Street, St James Avenue, Dormer and Perry Street. These trees currently have scant protection and it is feared that they will fall to the developer's chainsaws to make way for access to new developments. This will amount to authorised vandalism; it is hard to imagine anywhere else that such a War Memorial would be placed at risk. This living memorial network is now part of the identity of Papanui. New residents to the area are very clear that they are one of the reasons they seek out this area.
7. There are numerous large mature trees in Papanui and these coupled with the street trees make it a pleasant place to be, the trees muffle the road noise, absorb pollution and provide homes for a large bird and insect population. We are very privileged to have in St James Park a large tree that the monarch butterfly has chosen to make its winter home in such numbers that at times it looks clothed in orange leaves. This tree is only one of a large number of stately trees in this park
8. The built amenity, Papanui housing, is of a style and nature that generally has an intimate relationship with the street making those streets usually tree lined very pleasing to be in. People garden here, take a pride in their homes, the large grass road berms are well kept. The houses are well maintained and show a pride in belonging. It simply put is a great place to be which is why people move here and stay for decades. Papanui housing shows the history of its settlement, one that started at the same time as Christchurch. The character of this housing is



mainly intact and with the loss of much of Christchurch's built heritage this makes this suburbs special character of greater importance to the city than previously.

9. The Memorial Trees in St James Avenue were a significant factor in my husband and me choosing to live in Papanui. We jumped at the chance in 2009 of being able to buy an early kauri villa. We had nearly completed a significant renovation on it when the 2010 Earthquake struck. We were struck dumb with disbelief when we realised that our treasured home was broken. The community that surrounded us took us in and supported us. When the decision was made that the home was unsafe and needed demolition and on building insurance we were left with a significant loss. We never considered moving elsewhere even though rebuilding meant depleting our life savings at retirement age. We made a considerable investment in building a home that could cope with my inevitable need of a wheel chair and all that goes with that. We also decided to build as kind to the environment as possible and have one very expensive eco house that is easy for me to live in. It is doubtful if we would have been able to invest family trust monies as well so heavily in Papanui if it was known that the zoning of the area was up for possible change.
10. The LURP states that 'Recovery is concerned with all aspects of the wellbeing of communities including the social, cultural, economic and environmental aspects that contribute to the quality of life for residents and visitors. This is not limited to earthquake damaged areas but is also concerned with restoring and enhancing greater Christchurch to achieve recovery from the earthquakes in all respects. Therefore it is difficult to understand the desire to rezone this area and destroy what the LURP is trying so hard to achieve.

Signed:



Date: 15<sup>th</sup> June 2016

We oppose the High Density and Medium Density Development in Windermere Road as residents.

We have lived in the area now for 13 years and have enjoyed the sense of community, heritage and significance in the area. We wish to preserve that going forwards.

#### A. What is the memorial?

1. With regard to Windermere Road and the associated other 14 avenues the first question to consider is what is the memorial?

#### Historical records

2. The information on the "Memorial Streets and Their Original Plantings and Dates Planted"<sup>1</sup> shows Windermere Road to have 64 Fraxinus Ornus planted in 1947. When considering the request it was initiated around 14 July 1943.
3. By 25 March 1946 there was a public meeting "to further the project that certain streets in the district to be planted with trees as memorials to the fallen servicemen of the district". The focus was on side streets, not likely to carry arterial traffic.<sup>2</sup> By 20 August 1946 trees were planted in five of the avenues.<sup>3</sup>
4. By 13 May 1946 Windermere Road was being considered.<sup>4</sup>
5. There was no mention in those reports of refining the memorial to the trees and consideration was given in the reports to the width of the road, the traffic density of the road, the minimum width of the footpath, with the focus of a Memorial Street.
6. Plaques were added to the streets by way of public subscription. The trees were paid or by "some contribution should be made forwards the costs by residents of the district"<sup>5</sup>

#### How other avenues are treated

7. Comparing other avenues such as ANZAC Avenue in Moreton Bay Queensland that Memorial Avenue included plantings of 1760 trees over the 10 miles at 1 pound per tree.<sup>6</sup> When dealing with subsequent years the article provides that in the late 1950s developers first began purchasing properties for subdivision on the Anzac Memorial Avenue. The Avenue has been widened, officially been reopened in 1993, had to trees removed in 2006, but the integrity of the street has been maintained.<sup>7</sup> In terms of protection is provided the Avenue was listed on the Queensland Heritage register on 5 February 2009 having satisfied the criteria that
  - it was a place of importance in demonstrating the evolutionary pattern of Queensland's history,

<sup>1</sup> list provided

<sup>2</sup> P2 "Memorial Street Trees in Papanui" report

<sup>3</sup> P3 "Memorial Street Trees in Papanui" report

<sup>4</sup> Ref 4/1863 13 May 1946

<sup>5</sup> P3 and 4 "Memorial Street Trees in Papanui"

<sup>6</sup> P6 of 13 Wikipedia extract Anzac Avenue

<sup>7</sup> P7 of 13 Wikipedia extract Anzac Avenue



- the place is important in demonstrating the principal characteristics of a particular cultural places,
  - the place is important because of its aesthetic significance,
  - and the place has a special association with life or work of a particular person, group or organisation of importance to Queensland's history.
8. When considering the aesthetic significance the Avenue "is important for visitors experienced while progressing along the route in the visual delight of stretches of striking plantings..."
  9. Other significant memorial avenues such as King George V Avenue of Memorial English Oaks in Tamworth Australia was subject to threatened development. This was a memorial to the late King planting an avenue of English oak trees. When considering development it was found that a major subdivision of 500+ lots would cause increased traffic flow, eventual road widening, loss of trees as well as the loss of peace and tranquillity afforded by the trees and quiet location"<sup>8</sup>
  10. There are substantial English Memorial avenues and trees. Implicit in these tree-lined streets as the quality of the avenues. When discussing "Change and the Future" :  
  
"like all parks and like many other war memorials, their features are vulnerable to vandalism and metal theft. In addition, many memorial parts, why highly significant in terms of their intangible heritage of civic commemoration and personal histories, were not only as a clean modest designs, but were often spaces dominated by formal recreation provision. Combined with their all being relatively recent in origin, this is meant that their historic landscape interest has been undervalued at a national level and now is only being addressed."<sup>9</sup>
  11. New Zealand protection can be afforded under the Resource Management Act - this provides the protection of historic heritage from inappropriate subdivision, use and development.

## 6 Matters of national importance

In achieving the purpose of this Act, New Zealand protectioning functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall recognise and provide for the following matters of national importance:

- (a) the preservation of the natural character of the coastal environment (including the coastal marine area), wetlands, and lakes and rivers and their margins, and the protection of them from inappropriate subdivision, use, and development;
- (b) the protection of outstanding natural features and landscapes from inappropriate subdivision, use, and development;
- (c) the protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna;
- (d) the maintenance and enhancement of public access to and along the coastal marine area, lakes, and rivers;
- (e) the relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga;
- (f) the protection of historic heritage from inappropriate subdivision, use, and development;
- (g) the protection of protected customary rights;
- (h) the management of significant risks from natural hazards.

<sup>8</sup> P3 of 10 Wikipedia King George V memorial Avenue

<sup>9</sup> P 13 War Memorial Parks and Gardens (UK Article)

## **B. 2016 Evidence, Submissions and Findings**

12. Applying these theories to Windermere Road , in 2016 The Independent Hearing Panel considered in a full hearing the significance of Windermere Road for medium density housing. They were of the view that it was a potential historic heritage site under section 6(f) of the Act as set out below. That suggestion would make the area inappropriate for subdivision, use and development.
13. The key aspects of the decision are set out below.

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

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### **DECISION 41**

#### **Chapter 14: Additional Residential Medium Density Areas for Linwood (Eastgate), Hornby and Papanui (Northlands)**

#### **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.<sup>14</sup>

[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-linwoodeastgate-hornby-papanui-northlands/>. 9 Additional Residential Medium Density Areas — Chapter 14 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] \_\_\_\_\_ 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. 10 Additional Residential Medium Density Areas — Chapter 14

[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.

### **Evidence from the IHP hearing**

14. The evidence that the decision was based on is a matter of public record available on the Internet. Relevant extracts from the internet of expert evidence is set out below<sup>10</sup>.
15. Dr Murray Williams provided expert evidence as a member of the Papanui Heritage group as to the has direct nature of the houses in the area. With regard to Windermere Road he confirmed Housing dates back to the 1880s and includes an eclectic mix of housing styles some dating from the late 20<sup>th</sup> century. However there are still examples of interwar bungalows and one superb example of a transitional villa at number 101 that was probably built in the late 19<sup>th</sup> century.
16. As a heritage expert at paragraph 7(m) of his evidence Dr Williams talked of the importance of the War Memorial and the uniqueness of the scope and nature of the scheme to Christchurch. To him

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<sup>10</sup> evidence of Mike Davidson, chair on behalf of Shirley/Papanui community board, P Tucker and C Winefield, M Howley, Dr Murray Williams, and other submitters is attached

“it was an effective way to beautify the suburb was suggesting themes of reflection and regeneration. Four of these streets Dormer and Perry streets, St James Avenue and Windermere Road are part of this memorial and it is obvious that the trees could be fracture dead by the proposed change in residential density. It is likely some of these trees could be removed to cater for access to smaller lots permitted under the rezoning. In my opinion if this were to occur, it would amount to a gesture of distributed respect in the war and allergist to demolishing and warm Oriel statue or obelisk”

17. His final conclusion was

“approving the recommendation would result in the eventual loss of built heritage created over a period of hundred and 30 years. This would negatively fracture the character of significant areas of Papanui”.

He makes comparisons to other areas that have had development noting

“the remaining original character of that precinct will soon be obliterated”

and this underlines the importance of retaining the areas that have been recommended for a change in zoning both quite he also praises the diversification of houses and streetscapes to provide architectural history.<sup>11</sup>

18. Legal submissions filed by Mr Cleary of Anthony Harper considered that then legislative framework. At paragraph 6.12 of the submissions it is noted there is unchallenged evidence before the panel of the Papanui South range of character and amenity value. The focus of the submissions was whether the unchallenged evidence in relation to the special values of the area, including War Memorial Heritage characteristics and its existing high-quality ill perform are such that lower density RS zoning more appropriately protects and manages these values”

### **C. Post 2016 Intensification of Windermere Road and area**

19. Since 2016 Windermere Road has come under more pressure with the rebuild of Te Ora Hau educational facility being rebuilt including increased classrooms. Significant events occur quite often.

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<sup>11</sup> paragraphs 7(h), 7(m), 8 and 9 Dr Murray Williams









20. The rebuild of the substantial 2 to 3 story Bellevue retirement complex has significantly increased traffic density through staff, visitors and residents. The previous building was destroyed in the earthquakes. The photo below does not show the new wing that is being built on Windermere Road to the rear that is roughly the same size as the existing structure.

< Back

# The Bellevue.

Set in the heart of leafy Papanui.

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 Christchurch



21. The area is being impacted in other ways through density in terms of housing at 2 storey level. An example of the aesthetic clash between trees and building is set out below with development on the Harewood Road side of St James Park. This is a 2 storey development I believe. Imagine a 6 storey development and the trees and 'avenue effect'.



22.



**D. What standard has CCC applied?**

23. The Christchurch District Plan – Scheduled Heritage Place Heritage Assessment – Statement of Significance – Heritage Item Number 1459 as set below. In this document the matters that are of significance are the trees and plaques being of high social and historical significance.

- The “Papanui War Memorial Avenues are of high cultural and spiritual significance as memorials to fallen servicemen from the Papanui district”.
- Further it is a living memorial - “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 the trees”.
- The architectural and aesthetic significance for their landscape values.
- Housing is relevant - “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”

24. The conclusion is that: -

“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-site”<sup>12</sup>

25. I suggest this standard is similar to overseas views and Dr Williams and the IHP decision.

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<sup>12</sup> P1 and to Christchurch district plan – scheduled heritage place Heritage assessment – statement of significance heritage item number 1459

**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.

### **CCC applied a different test**

26. However CCC adopted a restricted view. Correspondence by email from CCC indicates the elements that were to be protected where the trees, the plaques and the "Avenue effect" but that high and medium density would be permitted with no protection for the avenue itself.



27. The email suggested the housing and the avenues were evaluated is not meeting the criteria required for a protection as a residential Heritage area. This is disputed.
28. This leads to 2 issues. The "Avenue effect" requires an Avenue in our submission. Looking at the precedents above and definitions above an Avenue is something that provides aesthetic significance and is dependent not only the trees and plaques but the street itself.
29. Breaking this in parts - the trees, the plaques, the housing, the architecture and aesthetic value were of importance in CCCs report above. No attempt was made in this document to segregate trees and plaques from housing, the avenues themselves or to provide a justification of how the Avenue effect would remain in place if housing, architecture, and arguably aesthetic effect no longer existed. The significance of the area was a combination of all of the elements.
30. I requested an Official Information Act request to find out more about how CCC had come to the conclusion that the trees and plaques would sit alongside high-density and medium density housing without impacting on the Avenue effect. That was requested on 27 February 2023 and no information has been provided. The assumption therefore is that this information is unchallenged. As it is placed on the CCC website with regard to identifying why Windermere Road is a heritage area this assumption seems reasonable.
31. Looking at comparisons: -
  - the steps that have been taken overseas to preserve the Avenue has included preserving the avenue along with the trees and the plaques.
  - Memorial Avenue to the airport has not been included in the development and presumably the rationale for its exclusion is its layout and Memorial status. It is similar to that of Windermere Road. It is a Memorial Avenue with an Avenue effect.
32. The criticism that the housing lacks aesthetic value – I suggest the housing is of aesthetic significance and of historical value going forwards based on expert reporting and the IHP decision.
33. We rely on the document above from CCC that concludes the Avenue, along with its housing, is or architectural significance.
34. We refer to the findings of Dr Williams. It was recorded in the submissions the Papanui evidence was unchallenged. Dr Williams expert evidence is that Windermere Road does contain housing that qualifies and in fact is important for heritage consistent with the report writer above.
35. The findings of the Independent hearing panel are relevant particular with regard to the comments around section 6(f) of the RMA.

**E. What evidence is there the integrity of the memorial avenues will be maintained without protection against housing density?**

36. We suggest the Avenue effect will deteriorate - with high-density development and medium density development on Windermere Road traffic will increase and car parking and congestion. It is already a through road often used by commuters to avoid Harewood Road/Grahams Road corner in the rush hour. Waimairi school traffic continues to park on the street. The loading has increased with Te Ora Hau and Bellevue retirement complex and apartments. This will increase as the retirement complex and apartments new wing is finished.
37. The sheer height and imposing nature of high density and medium density buildings will impact on the aesthetics and architectural integrity. The photo of the small St James Park development shows the impact of development against the trees. The modern housing will lack character and erode the character housing stock.
38. The impact of building works, Sewerage Works, driveway works will impact on the trees. Already with houses being built have been issues with developers wanting to remove or closely encroach on trees.
39. Quite simply, the Avenue effect will be lost. The close proximity of trees and high-density apartment blocks or multi-storey houses will be inconsistent with the memorial effect.
40. Very little has been done to date to lift profile of the significant living memorials and despite that CCC conclude there is " regular commemorative events associated with the avenues and the trees".
41. Windermere Road is a significant area. It is of value to all who have had family lost in the Wars. It has a friendly sense of community and some families have lived there for some generations. The street trees are something we as residents in our home are aware of the proud to be associated with. It would be of great benefit to know as a resident the history was being protected. It should be allowed to "live" going forwards. The pressure for development needs to be balanced with heritage as the commentary above suggests.
42. It is our submission that an avenue effect includes the trees and plaques but essential to the character is the avenue and housing that the trees rely on – without that it will be a street with some trees dwarfed by huge buildings. In my view it will irreversibly diminish the memorial. There are examples of development of 2 storey housing units that can be consistent with both increasing density and preserving character that should be a first resort.



PK Tucker and CS Winefield

## MEMORIAL STREETS AND THEIR ORIGINAL PLANTINGS AND DATES PLANTED

ALPHA AVENUE 34 *Malus prunifolia* planted 1947

CLAREMOT AVENUE 19 *Malus spectabilis* planted 1945

CONDELL AVENUE 57 *Sorbus pinnatifida* planted 1946

DORMER STREET 9 *Acer saccharinum* planted 1946 and 20 *Liquidambar styraciflua* planted 1946

GAMBIA STREET 20 *Malus micromalus* planted 1947

HALTON STREET 40 *Malus prunifolia robusta* planted 1952

KENWYN AVENUE 25 *Camellia japonica* cultivars and 9 *Quercus palustris* planted 1949

LANSBURY AVENUE 17 *Prunus cerasus* "Kanzan" planted 1949

NORFOLK STREET 20 *Prunus cerasus* "Kanzan" planted 1949

PERRY STREET 36 *Ginkgo biloba* planted 1945 and 26 *Quercus lusitanica* planted 1947

SCOTSON AVENUE 19 *Quercus coccinea* planted 1950

ST JAMES AVENUE 42 *Quercus coccinea* planted 1947

TOMES ROAD 51 *Malus sieboldii* planted 1947

WINDEREMERE ROAD 64 *Fraxinus ornus* planted 1947

HARTLEY AVENUE 58 *Malus prunifolia* planted 1950



## MEMORIAL STREET TREES IN PAPANUI

In the 14 July 1943 Christchurch Beautifying Society Records it shows that they wrote to the Christchurch City Council to request that a public meeting be called to support the Minister of Internal Affairs in his suggestion that Memorial trees be planted in the memory of fallen soldiers.

They wrote again on 11<sup>th</sup> April 1945 and again on the motion of Mr Sturrock on 7<sup>th</sup> June 1945. This was the first beginnings of the movement to plant the streets in memory of soldiers.

The records of the Christchurch City Council minutes of the 12 February 1945 show that a request received for the planting of trees in Tillman Avenue and Blair Avenue was approved. (Clause 9) 4/1777

There then follows the Chairman's Report that shows that this request was from the Papanui Beautifying Association (96109 letter reference) . Documents in the Christchurch Kete by Janet Tillman state that it was a long held desire by Harry Tillman to have this street planted so that it could be called an avenue. It was not recognised as a memorial street but it now carries a plaque.

In the CCC Chairman's report of 2<sup>nd</sup> July 1945 (4/1803) it states that a letter had been received from the Christchurch Beautifying Assn.(96109) asking the Council to make a start on the street tree planting scheme of Mr Barnett to commemorate individual fallen soldiers.

The next mention in the CCC Minutes is on the 14<sup>th</sup> November 1945 in ref:3/2453 CHAIRMANS REPORT TO THE WATER SUPPLY AND WORKS COMMITTEE. Item one was THE PLANTING OF TREES IN PAPANUI and notes that a letter from the Christchurch Beautifying Assn. (96109) was received refuting the Councils response to previous letters that the planting of trees would be a danger to traffic and suggesting that a trial be made with Tillman Avenue, as the trees when fully grown must have an effect for the good on the child mind. It was resolved that the matter be considered with the estimates.

The 4<sup>th</sup> March 1946 Chairman's Report to the Abattoir and Reserves Committee (4/1847) clause 12 states that a letter(96109) from the Papanui Suburban Committee, Christchurch Returned Services Association was received requesting the City Council that any trees planted in the streets of Papanui be deemed Memorial Trees.

The Minutes Clause 12 MEMORIAL TREES – PAPANUI

Resolved that this clause be approved.

The Superintendent of Reserves Supplementary Report on the question of Memorial Trees in the Streets in the Papanui District was submitted as per copy attached and approved.

Ref 4/1881 in the CCC records is a letter from the Reserves Office of the CCC dated 19 August 1946, to the Chairman and Members of the Reserves Committee.

In clause (d) this letter under the heading ARBOR DAY CELEBRATIONS states that on August 20<sup>th</sup> at 2pm with the consent of the Council the Papanui Returned Services Association in collaboration with the Papanui Beautifying society have arranged for the planting of memorial trees in Perry Street, Dormer Street, St Johns Street and Tillman Avenue. St Johns Street is now known as Blair Avenue.

The trees planted will be Canadian Maples, Maidenhair Trees (Ginkgo) Liquidambars and Scarlett Oaks. It is considered that as these trees will serve as memorials to fallen servicemen from the Papanui District that some contribution should be made forwards the costs by residents of the district.

This was received and it was resolved to make a charge of 10/- per tree.

That set the planting in progress in line with the streets selected in the report of MJ Barnett, Parks and Reserves.

Ref4/1884 9<sup>th</sup> September 1946 Tree Planting in Pratt Street and Alpha Avenue covers a dispute between the Council and the General Manager of the Municipal Electricity Department over the planting of trees in the carriage way of these streets. Clause 8 Minutes Tree Planting – Pratt Street and Alpha Avenue resolved to inform the MED that the Reserves Department is endeavouring to plant all trees on the pavement, but that it has departed from the principal as far as these two streets are concerned.



This clause in the 4<sup>th</sup> March 1946 Minutes was the beginning of the Memorial Street Tree plantings in Papanui.

Ref4/1851 25th March 1946 SUGGESTED TREE PLANTING IN PAPANUI STREETS AS MEMORIALS

The following letter (96109) has been received from the Papanui Beautifying Association:-

"A letter in my possession from the Papanui Branch of the RSA asks that the Papanui Beautifying Assn. call a public meeting in Papanui to further the project that certain streets in the district be planted with trees as memorials to the fallen servicemen of the district."

"Such side streets as St John Street, Perry Street or similar streets not likely to carry arterial traffic would be chosen and money for memorial tablets would be obtained by public subscription.

Before any move is made we would like to find out the City Councils attitude in the matter. A few years ago at the sponsoring of the MED the council decided that trees should not be planted in the street itself and that only dwarf trees be planted so as not to interfere with the electric wires. As memorial street must have a life of at least 50 years, trees such as beech, oaks, elms, etc. must be planted. It will be necessary to have the wires placed underground.

Please let me know the Councils opinion on the proposal also whether the Mayor and Councillors will attend the initial meeting and assist."

The Superintendent of Reserves reports that some 10 years ago the Christchurch Public Utilities Committee after several discussions on the question of trees in residential streets made the following recommendations to the Council and these were finally adopted.

1. That a low growing type of tree be adopted.
2. That the planting of trees in carriageways should not be done in future owing to the grave danger of vehicular traffic especially at night time.
3. That the minimum width of footways for tree planting be not less than 15 feet and preferably 17 or 18 feet for a through traffic street unless otherwise found desirable.

While in the main these resolutions are desirable on the other hand it must be admitted that in Christchurch in many of the residential suburban areas there are numbers of short streets some a full chain in width and a block or a few blocks in length only. In these streets there is no through traffic and all vehicular traffic is reduced to a minimum. Many of these streets offer ideal positions for street planting. If it is considered worthwhile the Superintendent of Reserves suggests that a survey of the streets considered suitable for planting could be made in the Papanui district and recommendations brought forward.

The 13th May 1946 ref 4/1863

The report of the Superintendent of reserves was submitted as per copy attached and dealt with as follows:

Ref: 4/1863 13 May 1946

Streets within The Papanui District to determine which ones would be considered suitable for the planting of memorial trees, the following report is submitted.

Streets considered suitable for planting East of and Parallel with Papanui Road

NORFOLK STREET AND SCOTSTON AVENUE

Both streets are one block in length between Tomes Road and Mays Road with no intersections.

BENNETT STREET

Two blocks in length between Paparoa Street and Mays Road but intersected by Tomes Road.

WAKEFIELD AVE

one block in length between Tomes Road and Paparoa Street. *This became Claremont Ave in 1948*

GAMBIA STREET

Two blocks in length between Grants Road and Wyndham Street, intersected by Frank Street. *Part of Loftus 1946*

All five streets are a full chain in width and are not likely to be extended as through streets, except Wakefield Avenue. (Claremont)

B. STREETS AT RIGHT ANGLES TO PAPANUI ROAD TOMES ROAD, PERRY STREET, DORMER STREET

Tomes Road has three intersections and Perry Street one, and Dormer Street no intersections.

Widening is being carried out from time to time in the following streets but at present they are not suitable for planting:

Frank Street Wyndham Street, Loftus Street. Proctor Street, Horner Street, Mary Street

The following are likely to become through streets and there planting is not recommended:

Mays Road, Paparoa Street, Grants Road

Rayburn Avenue has already been planted.

#### C STREETS WEST OF THE MAIN NORTH RAILWAY LINE

##### CHAPEL STREET, SAILS STREET, UNION STREET

All three are short streets and on one side State Housing is being carried out and provision has been made for a wide pavement and grass strip.

Where such provision is made planting can be carried out.

#### WEST OF PAPANUI ROAD

##### ST JOHN STREET (BLAIR AVENUE)

This is a short street between Papanui Road and the Railway line, with no intersections and no outlet

##### TILLMAN AVENUE

This is also a short street off Blighs Road, giving access to the school and with no intersections

##### HALTON STREET

Between Watford Street and Hartley Avenue. One intersection Only

##### ALPHA AVENUE

Between Normans Road and the Railway Line with no intersections and no outlet

#### WESTHOLME STREET

One half of this street is provided with a wide pavement and grass berm. The other half of Westholme Street has the full chain width but not a wide pavement and no intersections

##### LEES ROAD AND DENVIR STREET

Both are short streets in a Government Housing Block and with wide pavements provided.

##### HAWTHORNE STREET AND SEARELLS ROAD

Are being widened as the occasion permits and at present are not suitable for planting.

##### WATFORD STREET, NORMANS ROAD, BLIGHS ROAD, MATSONS ROAD AND IDRIS ROAD

Are all through streets and are not recommended for planting.

WINDERMERE ROAD should be given consideration.

The following have already been planted

St James Square, Hartley Avenue, College Avenue, St James Avenue, Winston Ave, Peel Street,  
Urunga Avenue, Benchley Avenue, Bellvue Ave.

A plan of the District showing the roads is tabled herewith

Yours obediently

MJ BARNETT, superintendent



Ref4/1876 Clause 8: 15 July 1946

# REQUEST FOR TREES TO BE PLANTED IN ALPHA AVENUE

Resolved to agree to the request.

Clause 8. Request for trees to be planted in Alpha Avenue.

Letter (96109) From Mr Mawson Stewart asking on behalf of other residents of Alpha Avenue and himself, if the Council would be prepared to plant trees in that Avenue.

He states that if the Council is prepared to do this work, he would be prepared to assist the Council in approaching the remainder of the residents.

The Superintendent of Reserves reports that Alpha Avenue is a short blind Street of a full chain in width off Normans Road. The pavement is the usual width and the trees would have to be planted on the roadway. Subject to the approval of the works department, he recommends that the request be acceded to.

Ref 4/1878 Chairman's Report

Clause 8

Tree planting, Alpha Avenue

With reference to the request made by the residents of Alpha Avenue for that street to be planted with trees; the works Committee at its meeting on the 24th instant approved of the proposal.

Minutes Clause 8 Tree Planting, Alpha Avenue. This clause was received.

Ref 4/1885 Clause 8 Tree Planting – Pratt Street and Alpha Avenue

Resolved to inform the MED that the Reserves Department is endeavouring to plant all trees on the pavement, but that it has departed from the principal as far as these two streets are concerned.

The work above is taken directly from the Records of the Christchurch Council Archives at the Recall facility to Christchurch Airport. The records of the Christchurch Beautifying Society were accessed through the Christchurch Museum Archives. Hand written work from the archives is enclosed.

No access was granted by the Papanui Beautifying Society to their records, they issued a short statement stating the records for that period no longer existed.



Copy of the Booklet War Memorial Avenues, Papanui Christchurch New Zealand is attached. This booklet is difficult to find in the Kete until the word TILLMAN is typed into the search engine. Kete is a part of the Christchurch City Library on line and stores local history.

# Anzac Avenue

From Wikipedia, the free encyclopedia

**Anzac Avenue** is a heritage-listed major arterial road lined with trees in the Moreton Bay Region, Queensland, Australia. It runs 17.8 kilometres (11.1 mi) from Petrie to Redcliffe, with most of the route signed as state route 71. The route was formerly the main route to the Redcliffe peninsula, until the Hornibrook Bridge was opened in 1935.

Opened in 1925, Anzac Memorial Avenue (as it was originally named) is the longest World War I memorial avenue in Queensland and was the first bitumen motor road connecting Brisbane to the popular holiday resort of Redcliffe, and reflects the growth in car usage in the early 1920s. It was added to the Queensland Heritage Register on 5 February 2009.<sup>[1]</sup>

The road provides the quickest access to the Peninsula Fair Shopping Centre, as well as being the main access road for the Redcliffe Hospital.

## History

### Early access to the Redcliffe peninsula

The first road along the route was an Aboriginal track used to access Kippa Ring, then the site of a prominent bora ring located about 3 miles (4.8 km) north-west of Redcliffe.

Tom Petrie guided a picnic party to the Redcliffe seashore from Petrie (then known as North Pine) in 1859. A road from Bald Hills to Redcliffe was formed by the early 1860s, but by 1864 this was almost impassable. Tom Petrie marked a track from the Hays Inlet crossing and in the early 1870s assisted in surveying the road. Known as the "Brisbane Road" it became the primary way of accessing the Redcliffe Peninsula by road.<sup>[1]</sup>

Redcliffe's growth as a seaside resort occurred from the late 1870s. In this era, frequenting seaside resorts became increasingly popular in Australia. Taking in sea air and bathing in saltwater were promoted for their health giving properties. From 1876 a weekly mail

Anzac Avenue

Queensland

Mango Trees along Anzac Avenue at Mango Hill, Queensland.

Wikimedia | © OpenStreetMap

General information

Type

Road

Length

17.8 km (11 mi)

Route number(s)

71

State Route 71

26

State Route 26

(Deception Bay Road – Elizabeth Avenue)

Major junctions

58

Gympie Road / Dayboro Road (State Route 58), Petrie

M1

Bruce Highway (M1)

West end



service began to Redcliffe via North Pine (Petrie) and a passenger and goods service to Brisbane was established by 1880. The opening of the Redcliffe Jetty in 1885 enabled people from Brisbane to visit in large numbers on steamers, bringing 10,000 passengers in 1889-1890. By the end of the 1880s, the Redcliffe Peninsula was the largest tourist resort area between Sandgate and Noosa Heads. Guest houses and hotels were built to cater to the burgeoning tourist trade.<sup>[1]</sup>

By the turn of the century, coaches ran three times a week to North Pine. The poor condition of the road made the trip between Brisbane and Redcliffe difficult, impassable in wet weather. 1885 marked the first of many attempts to pressure the Queensland Government for a railway branch off the North Coast railway line. A potential route was surveyed in 1893, but various lobbying attempts up until 1915 were unsuccessful. By the start of the 1920s, a trip to Brisbane for Redcliffe residents was by road via Petrie or a boat/train connection from Sandgate, both long journeys of up to four hours.<sup>[1]</sup>

Redcliffe's future prosperity depended on reducing its isolation from Brisbane. Its small permanent population grew little between 1900 and 1921. While large steamships brought thousands of people to the area, much of their time and money was spent onboard rather than locally. The growth in motor touring soon determined Redcliffe's linkage to Brisbane.<sup>[1]</sup>

## Memorial avenue

The loss of lives during World War I had a profound impact upon the Australian population and memorials became a prominent feature in communities throughout the nation. Monumental memorials were the most common expressions of remembrance. Memorials with a utilitarian function, such as a hospital or hall were also erected. This practical emphasis also extended to roads, often built with the aid of public subscriptions, additionally providing work for returned soldiers. Anzac Avenue is an example, as is Memorial Drive in Adelaide (1925) and the Great Ocean Road in Victoria (begun in 1918). Over 200 Avenues of Honour were planted along roads and in parks, a type of memorial found throughout Australia from 1917. Victoria planted more avenues than any other state. While "digger" statues were ubiquitous throughout Queensland, memorial avenues appeared to be less common.<sup>[1]</sup>

Anzac Memorial Avenue was Queensland's largest construction of an avenue, an ambitious project achieved through public subscription. Most war memorials in Queensland towns and shires honoured servicemen from a

- 26

Deception Bay Road

(State Route 26)

26

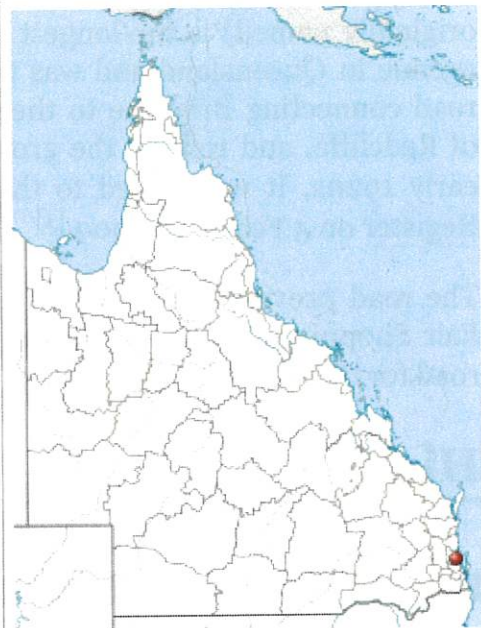
Elizabeth Avenue (State Route 26)

27

Oxley Avenue (State Route 27)

<b>East end</b>	Redcliffe Parade / Marine Parade, <u>Redcliffe</u>
<b>Location(s)</b>	
<b>Major suburbs</b>	<u>Petrie</u> , <u>Kallangur</u> , <u>North Lakes</u> , <u>Mango Hill</u> , <u>Rothwell</u> , <u>Kippa-Ring</u> , <u>Redcliffe</u>

### Anzac Memorial Avenue



Location of Anzac Memorial Avenue in Queensland

<b>Location</b>	Anzac Avenue, <u>Redcliffe</u> , <u>Moreton Bay Region</u> , <u>Queensland</u> , <u>Australia</u>
<b>Coordinates</b>	<span><span><span><span><span>27.217251°S</span> <span>153.062355°E</span></span></span><sup>[2]</sup></span></span>
<b>Design period</b>	1919 - 1930s (interwar period)

#### Queensland Heritage Register

<b>Official name</b>	Anzac Memorial Avenue (former)
----------------------	--------------------------------



specific area. Anzac Memorial Avenue had a wider memorial dedication, not only for residents of the Redcliffe and Petrie areas, but for Brisbane's population, whose support enabled the plantings to occur.<sup>[1]</sup>

The early 1920s saw the beginnings of increasing car popularity in Queensland. The number of people driving cars between 1921 and 1923 more than doubled. Such considerable growth increased calls for adequate roads in both urban and rural areas, not only for economic purposes, but also as routes for motor tourists.<sup>[1]</sup>

In response to these pressures, the Queensland government established the Main Roads Board in 1920. Prior to this, the onus was on local shire councils to fund road construction and management. They were largely unable to provide the finances or technical skills to respond to challenges posed by increased car use. After the Board's establishment, co-operative funding arrangements occurred with local councils, who largely maintained roads after their construction. The policy of the Main Roads Board was to construct roads that operated as feeders to railway networks and aided the development of newly settled and existing districts.<sup>[1]</sup>

Prior to and after the Board's establishment, the Royal Automobile Club of Queensland (RACQ) occupied a central role in advocating for better roads for Queensland motorists. Thomas James Rothwell, President of the RACQ from 1921 to 1923, was the key protagonist in establishing the Petrie to Redcliffe Anzac Memorial Avenue. From 1914, the RACQ allied itself to the war time effort, raising funds and holding numerous benefits. Rothwell, a successful men's outfitter in Brisbane, was actively involved in such causes. During the war, he was secretary of the Queensland Patriotic Fund and coordinator of the Returned Soldiers Transport Corps, eventually awarded an OBE for his services.<sup>[1]</sup>

Rothwell's initial impetus in advocating for the road came from a referral of the Brisbane Motor Traders Association, who "desired one good road in the vicinity of Brisbane", for motor touring purposes. This push also coincided with the Returned Services League's public appeal of "Work Not Charity" in support of the large number of ex-soldiers unemployed at the time. Rothwell saw the opportunity for these causes to coalesce, by constructing a good road for motorists that would provide employment to returned servicemen. Planting an avenue of trees along such a road would also create a significant Queensland war memorial.<sup>[1]</sup>

The gazettal of the Brisbane-Gympie Rd between Kedron and Petrie as a main road informed the decision to choose the Petrie-Redcliffe road for Rothwell's proposal. By designating the Petrie-Redcliffe route as a main road, Brisbane motorists would gain a high quality motoring road from the city to a seaside resort, while reducing Redcliffe's isolation.<sup>[1]</sup>

On 21 June 1922, the RACQ presented the case for the road to Harry Coyne, the Queensland Minister for Lands. Coyne agreed the road would likely be gazetted as a main road on the undertaking that non-government capital would be raised to begin its initial construction, while also suggesting the name of "Anzac Memorial Avenue". The Anzac Avenue Memorial Committee was established with Rothwell as chairman. A fundraising figure of £20,000 was set. This amount would provide for the wages of ex-servicemen employed on the road, while the Main Roads Board would bear the cost of construction materials.<sup>[1]</sup>

Publicity for the fundraising appeal for the Anzac Memorial Avenue appeared in the Brisbane press on 1 July with the rationale for supporting the proposal:<sup>[1]</sup>

<b>Type</b>	state heritage (landscape, built)
<b>Designated</b>	5 February 2009
<b>Reference no.</b>	602693
<b>Significant period</b>	1920s (fabric) 1920s-ongoing (historical use)
<b>Significant components</b>	tree groups - avenue of, road/roadway

"Every motorist is interested in this scheme. It is surely worth at least 5 pounds to ~~1094~~ motorist to have one good road. Every business man is interested. It is surely worth a good deal to relieve the labour market of its unemployed. Every citizen is interested. It is surely worth something to you to have a Memorial Avenue that will at once connect one of Brisbane's beauty spots and commemorate for all time the valour of our soldiers."

As part of the public fundraising effort, a progress board was erected outside the premises of the Commonwealth Bank in Queen Street, Brisbane. A figure of a car moved forward in increments of 1000, towards the end goal of £20,000. 8 August was proclaimed as "Anzac Avenue Badge Day" with car badges sold to raise funds. Other events included social functions at Redcliffe. By December 1922, £7000 had been pledged by public subscription.<sup>[1]</sup>

The target of £20,000 received a significant boost through government funding. In July 1922, the Australian Government, announced a National Main Roads Policy, allocating money to the state's road building schemes on a 4/8 federal, 3/8 state, and 1/8 local government funding arrangement. The objective of the policy was to "develop and open up the country, and promote land settlement, and aid temporarily unemployed soldiers".<sup>[1]</sup>

Through this funding, the Redcliffe road was allocated £12,000, a larger proportion of funding than any other of the first roads built under this funding agreement in Queensland. The combined public fundraising (£7000) and government contributions (£12,000) meant that within six months of the appeal's inception, the goal of £20,000 was close to being realised. Of the £7000 subscribed, a final amount of £6290 had been received by 1926, with the Main Roads Board making up the difference.<sup>[1]</sup>

The route was officially gazetted as the "Redcliffe Road" on 21 October 1922. Anzac Memorial Avenue was one of the earliest examples of Main Roads Boards' involvement in facilitating car-driven tourism in Queensland. The Board promoted Anzac Memorial Avenue for its dual purpose, as a road to a seaside resort that offered health benefits from a change of climate and scenic beauty, while providing developmental opportunities for the area. Until improvements to the South Coast and North Coast roads, Anzac Memorial Avenue was the premier road to a tourist resort from Brisbane.<sup>[1]</sup>

By December 1922, 25 returned servicemen had begun work on the road. By March 1923, this number had increased to 50. A number were engaged in clearing the road and undertaking associated earth works. Others were constructing reinforced concrete culverts and the bridge over Hayes Inlet, cutting and bending steel for the reinforcing bars and preparing timber for form work. Eleven men were working at the quarry within the Beerburum Soldier Settlement to source road materials.<sup>[1]</sup>

The importance of the avenue was underscored by the decision to seal the road. In the early 1920s, few roads throughout Queensland were sealed, especially outside of urban areas. Different materials were trialled by Main Roads to determine their suitability as a top metal surface to dress with tar and bitumen. Anzac Memorial Avenue featured the use of trachyte, a fine grained igneous volcanic rock sourced from the Beerburum quarry.<sup>[1]</sup>

Work included constructing culverts to cross over Hays Inlet and Saltwater Creek, and associated earthworks to provide a stable base for the roadway in the often low-lying areas that the route passed through.

In early 1923, Pine Rivers Shire Council and Redcliffe Town Council were granted control of the road's construction in their respective areas. Main Roads maintained responsibility for dressing the top surface with tar and bitumen, this process occurring through 1924 and 1925.<sup>[1]</sup>



Anzac Memorial Avenue was officially opened for traffic on 5 December 1925 by the acting Premier William Forgan Smith. A floral arch was erected in Petrie for the occasion, with the Mayor of Redcliffe, J.B. Dunn and Pine Shire Chairman, W Bradley, providing welcome speeches and thanking the government for its assistance. The party, in a long procession of cars, continued on to Redcliffe which was "en fete" for the occasion. The avenue was proclaimed as the best road to a tourist resort yet conducted in Queensland.<sup>[1]</sup>

In the week the road was opened, Rothwell wrote to the Brisbane Courier to draw attention to the tree-planting aspect of the memorial avenue. Rothwell noted the road was already utilised by hundreds of motorists on Sundays and public holidays. He called on the public to assist financially in making the road an avenue from Kedron Brook in Brisbane to Redcliffe, "a glorious asset to the State of Queensland". The first plantings were to be concentrated on the Anzac Memorial Avenue section between Redcliffe and Petrie.<sup>[1]</sup>



Memorial at Kallangur, 2016

The tree planting operations came more into focus in 1925 as the road works neared completion. An Anzac Avenue Memorial Tree Planting Committee had been established by early 1923. In December 1925, the committee comprised Rothwell, Ernest Walter Bick (curator of Brisbane Botanic Gardens), Edward Swain (Queensland Director of Forestry), Cyril Tenison White (Queensland Government Botanist), Henry John Moore (park superintendent of the Brisbane City Council) and Colonel DA Parsons (representing the Queensland Governor Matthew Nathan). The committee considered the types of trees that would be suitable and an estimate of the number of trees that would be required. Placing the trees 60 feet (18 m) apart, it was estimated 1760 trees were needed for each 10 miles (16 km) of the avenue and the cost of planting the trees, preparing the ground and making suitable guards would be less than £1 per tree. The committee selected a mixture of native and introduced sub-tropical species for the avenue.<sup>[1]</sup>

The inaugural planting occurred at Petrie on 28 February 1925. Two Cocos palms (Arecastrum romanzoooffianum) were planted at the front of the North Pine School of Arts in Petrie, by Governor Nathan. The trees were donated by Elizabeth Petrie, widow of local pioneer Tom Petrie. The palms were sourced from the extensive gardens of their nearby property "Murrumba".<sup>[1]</sup>

During the ceremony, Rothwell discussed particulars of the tree-planting operations. Approximately £5000 was needed for planting trees along the avenue between Redcliffe and Kedron, "but for that purpose only £50 was in hand". Donors of trees would receive a certificate for their contribution. For a further small donation, a plaque could be attached on or near the tree with the donor's name or the name of the soldier in whose memory the tree was planted. Mrs Petrie was presented with the certificate for tree No.1, a firewheel tree (Stenocarpus sinuatus) planted on the corner of Anzac Memorial Avenue and White's Road, opposite the School of Arts. This tree has not survived.<sup>[1]</sup>

On 7 July 1926 Rothwell and the president of the RACQ, Mr JE Carter, led a motorcade of guests from Brisbane for the official opening of Anzac Memorial Avenue, marked by a tree planting ceremony in Redcliffe. About 1000 invited guests, along with the general public, braved inclement weather to attend the ceremony.<sup>[1]</sup>

The Australian Governor-General, Lord Stonehaven planted the first tree, a Hoop Pine (Araucaria cunninghamii) on the northern side of the Avenue, at the Humbybong Street corner. Granting local school children a holiday, Stonehaven hoped they would be "guardians of the trees" realising that they are guarding not only a Queensland memorial, but one that will be recognised

throughout Australia. Lady Stonehaven, William Jolly (Mayor of Brisbane), JB Dunn, W Braddy and Mr Fraser East, President of the Returned Soldiers and Sailors Imperial League of Australia also planted trees.<sup>[1]</sup>

Rothwell's speech highlighted the need for contributions, especially from the motoring public, to make the tree-lined avenue a reality. Rothwell also announced that the Memorial Committee had decided not to offer individual plate names to be associated with particular trees as the Avenue was considered a memorial for all the soldiers and sailors who had lost their lives, especially to commemorate "the deeds of valour performed by the heroes who went from our state".<sup>[1]</sup>

By mid-1927, 1000 trees had been planted, encased in triangular wooden guards. The scale of the project provided challenges for the tree planting committee. While 2000 had been planted by 1933, unsuitable species and soil conditions, bushfires, human and animal impacts, borers and white ants, had damaged and destroyed some of the original plantings. With assistance from Main Roads, the committee were employing a man "with expert knowledge" to look after the trees. By this time, a shortage of funds meant the committee were unable to extend the planting scheme from Petrie to Kedron as proposed originally. Nevertheless, the avenue was still the largest of its kind in the state, made possible through public and private involvement.<sup>[1]</sup>

Thomas Rothwell died on 28 January 1928<sup>[3]</sup> and his involvement with the Avenue was honoured on Sunday 9 April 1933 with the unveiling of the Rothwell monument by the Queensland governor, Sir Leslie Wilson. This stone obelisk was placed on a small triangular piece of land at the intersection of Anzac Memorial Avenue and the Deception Bay Road, later moving to a nearby park (27.2173°S 153.0451°E) when a roundabout was placed on the site. Rothwell bequeathed the substantial sum of £1000 to the tree planting committee, which was acknowledged at the unveiling as having maintained the project.<sup>[1][4][5]</sup>

## Subsequent years

The building of Anzac Memorial Avenue reduced Redcliffe's isolation from Brisbane and consolidated its position as the city's seaside resort of choice. In 1928, the Brisbane Courier remarked, "Petrie is today notable for the traffic which passes through it day and night". By the mid-1930s, the Brisbane-Redcliffe bus ran five trips daily, with extra services on weekends. A 1933 tourist brochure described the recent progress of Redcliffe as "remarkable", evidenced by the erection of new villas and cottages on the peninsula. In the same year Redcliffe Mayor Alfred Henry Langdon praised the construction of the road for advancing Redcliffe "beyond the expectations of the most sanguine". The opening of the Hornibrook Bridge in 1935 further reduced the distance between Brisbane and Redcliffe, a catalyst for the area's permanent population growth.<sup>[6][1]</sup>

Until the late 1950s, when developers first began purchasing properties for subdivision, the landscape between Petrie and Redcliffe on Anzac Memorial Avenue remained predominantly rural, characterised by small mixed farms and sections of native vegetation. A number of farms capitalised on passing tourist trade by operating roadside fruit and vegetable stalls. Since this time, residential areas have extended along the avenue from both Petrie and Redcliffe, as northern commuter suburbs of Brisbane. Redcliffe's most westerly suburb was named Rothwell in 1971 by the Queensland Place Names Board in honour of the man who did much to bring the road to fruition.<sup>[1]</sup>

Over time, Anzac Memorial Avenue has been widened to accommodate increased car usage. During the 1980s and 1990s, sections of the avenue were duplicated to form a dual carriageway. Some trees were removed during this time. In Pine Rivers Shire, the council and the Department of Transport adopted a design to preserve the Avenue during roadworks; however a number of trees were removed. In March 1993, Anzac Memorial Avenue was officially reopened by



The Avenue incorporates culverts and bridge crossings, a memorial obelisk to Thomas Rothwell, memorials commemorating Australian participation in various war zones and a number of other public structures; these are not considered to be of heritage significance.<sup>[1]</sup>

## Plantings

The Avenue incorporates memorial plantings and other plantings including a number of mature trees. Notable plantings include:<sup>[1]</sup>

- Two Cocos palms (*Syagrus romanzoffiana*) at the entrance to the North Pine School of Arts
- Eucalyptus trees east and west of Lerosé Avenue
- 700 metres (2,300 ft) Mango tree (*Mangifera indica*) avenue between the Bruce Highway and Kinsellas Road, Mango Hill
- Slash Pines (*Pinus elliottii*) at the intersection with Deception Bay Road and immediately west of the intersection
- Norfolk Island Pines (*Araucaria cunninghamii*) along the Avenue through Rothwell
- Cotton trees and Eucalyptus trees in the median strip through Kippa Ring particularly between Klingner and Bremner Roads
- Slash Pines west of Bremner Road
- Pine trees in the median strip from Nathan Street to the Klingner Road intersection
- A Hoop Pine (*Araucaria cunninghamii*) to the west side of the corner with Humpybong Street
- Poinciana trees (*Delonix regia*) along the road through Redcliffe, particularly between John Street and Victoria Avenue
- The Fig tree at the roundabout terminating Anzac Memorial Avenue at Redcliffe.
- Firewheel Trees (*Stenocarpus sinuatus*)<sup>[8]</sup>

## Vistas

In addition to the amenity provided by the range of plantings along the road, the drive along Anzac Avenue provides many opportunities to enjoy vistas and views along and from the road including the vista east from Tilley Street to Redcliffe Parade towards Moreton Bay and towards the Fig tree terminating the Avenue at Redcliffe, and the vista west from Ashmole Street over the low area of Hay's Inlet and Pine Rivers towards Mount D'Aguilar, Mt Samson and Brisbane Forest Park.<sup>[1]</sup>

## Heritage listing

Anzac Memorial Avenue (former) was listed on the Queensland Heritage Register on 5 February 2009 having satisfied the following criteria.<sup>[1]</sup>

**The place is important in demonstrating the evolution or pattern of Queensland's history.**

Gazetted in 1922 and opened in 1925, following an earlier route established in the 1860s, Anzac Memorial Avenue was one of the earliest roads in Queensland constructed by the Main Roads Board. The Board was established in 1920 to respond to the greater demands on the road network posed by increased motor vehicle usage in the interwar period. Anzac Memorial Avenue is important in illustrating the early stages of this phase in the development of Queensland's road network.<sup>[1]</sup>

Queensland RSL President SW Kay and Pine Rivers Shire Chairman Rob Akers. Following the removal of a number of trees in 2006 for a transit lane, Queensland Transport and the Redcliffe RSL planted a memorial grove in Henry Pieper Park on the avenue at Kippa-Ring, with trees propagated from the slash pines.<sup>[7]</sup> While originally named Anzac Memorial Avenue, the road is more widely known and signed as Anzac Avenue.<sup>[1]</sup>

Other older trees have also not survived and records relating to the avenue once held by the RACQ and Main Roads Department no longer exist. The Cocos palms planted at Petrie by Governor Nathan in 1925 and the Hoop Pine planted in Redcliffe by Lord Stonehaven in 1926 still remain.<sup>[1]</sup>

Despite alterations, the idea of the road as a Memorial Avenue has been perpetuated by later plantings. While not all the trees are from the original planting list, they are an intrinsic component of the avenue's overall composition. The Mango Hill section of the Avenue is notable for its 700 metres (2,300 ft) section of Mango trees (*Magnifera indica*). There is a substantial section of mature Slash Pines (*Pinus eliottii*) between Kippa Ring and Rothwell, plus smaller sections at Kallangur. The first Slash Pines in Queensland were grown in Beerwah and Beerburum from 1924. Director of Forestry Edward Swain, who introduced the trees from the United States, was a member of the tree planting committee in 1925.<sup>[1]</sup>

Since the 1990s, along the Pine Rivers section of the road, different memorials commemorating theatres of war since 1945 have been erected.<sup>[1]</sup>

Despite the construction of the Hornibrook Bridge in 1935 providing an alternative route by car to the Redcliffe peninsula, traffic volumes along Anzac Avenue steadily increased as the years went by, necessitating duplication of some sections of the road in the 1980s and the 1990s. This widening, although required in order to manage traffic congestion, resulted in the need to remove or relocate some of the tree plantings along the route, a move that was not without controversy at the time.<sup>[1]</sup>

Although originally primarily a rural route, increasing population growth in the area, most notably the development of entirely new suburbs such as Rothwell and North Lakes, has meant that much of the route has taken on a suburban character, providing everyday access to residents, rather than being a tourist drive, as originally planned. The road was inducted onto the Queensland Heritage Register in 2009.<sup>[1]</sup>

## Description

The significant elements of the listing comprise the route of the road, the vistas experienced within the route and the tree plantings noted in the description below.<sup>[1]</sup>

Approximately 18 kilometres (11 mi) in length, Anzac Memorial Avenue travels from its intersection with Gympie Road at Petrie to its intersection with the roundabout at Redcliffe Parade, Redcliffe. It travels north-east through Kallangur, North Lakes and Mango Hill to Deception Bay Road at Rothwell, then turns east through Kippa-Ring and travels south-east for a further 750 metres (2,460 ft) before tracking east again and travelling as a straight avenue to Redcliffe.<sup>[1]</sup>

The present road incorporates the original route with widenings to accommodate changed traffic conditions.<sup>[1]</sup>



As the first bitumen motor road from a major urban centre to a seaside resort, Anzac Memorial Avenue is important in demonstrating the growth of car based tourism in Queensland in the 1920s and illustrates the growing importance of car access to the development of tourist resorts. Anzac Memorial Avenue catalysed the growth of Redcliffe as a major seaside resort for south-east Queensland during the interwar period.<sup>[1]</sup>

Built under a government policy designed to promote the development of roads that opened up areas for economic development, the Avenue demonstrates the increasing importance of tourism to the Queensland economy at the time. The Avenue was allocated a larger proportion of government funding than any other of the roads built under this funding agreement in Queensland at the time.<sup>[1]</sup>

The longest WWI memorial avenue in Queensland, Anzac Memorial Avenue is important for commemorating Queenslanders' involvement in a major world event. The avenue has maintained its role as a place of memorial by subsequent additions commemorating later twentieth century theatres of war.<sup>[1]</sup>

As a road constructed by returned servicemen, Anzac Memorial Avenue is a good example of a substantial scheme to assist ex-soldiers following WWI. Other initiatives included the state government soldier settlement schemes and other Main Roads projects. The construction of the road is important in demonstrating the involvement of government, civic bodies and the general public in addressing high levels of unemployment among ex-soldiers after WWI.<sup>[1]</sup>

**The place is important in demonstrating the principal characteristics of a particular class of cultural places.**

In its route, and as an extensive tree-lined avenue of planned and evenly spaced plantings, Anzac Memorial Avenue is important in demonstrating the characteristics of a memorial avenue.<sup>[1]</sup>

**The place is important because of its aesthetic significance.**

A landmark road in southeast Queensland, Anzac Memorial Avenue is important for vistas experienced while progressing along the route and the visual delight of stretches of striking plantings including poincianas, pines, cotton trees, eucalypts and the lush mango section.<sup>[1]</sup>

**The place has a special association with the life or work of a particular person, group or organisation of importance in Queensland's history.**

Anzac Memorial Avenue is important for its association with Thomas Rothwell and the Royal Automobile Club Queensland (RACQ), an organisation that has made a major contribution to the development of motoring in Queensland. As president of the RACQ from 1921-1923, Rothwell was the key protagonist in the establishment of Anzac Memorial Avenue. Rothwell's contribution to the Avenue is commemorated by a memorial cairn standing at the road edge of Rothwell Park and a nearby suburb that bears his name.<sup>[1]</sup>

## Route description

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The current route begins in Petrie, at a roundabout intersection with state route 58 at Gympie Road and Dayboro Road. It proceeds north, then north-east, through Kallangur, before crossing the Bruce Highway near North Lakes. After passing the Westfield North Lakes shopping centre, it proceeds north-east again through developing urban areas near Mango Hill, before crossing Hays Inlet at Saltwater Creek, and intersecting with state route 26 at Deception Bay Road. Signed as both routes 71 and 26, it then turns eastward and proceeds through the suburbs of Rothwell and



Kippa-Ring, reverting to route 71 only at an intersection with Elizabeth Avenue, before proceeding to Redcliffe, crossing state route 27 at Oxley Avenue, and terminating at a roundabout with Redcliffe Parade on the waterfront.<sup>[9]</sup>

## Upgrades

### Petrie intersection upgrade

A project to upgrade the intersection with Gympie Road and Dayboro Road at Petrie, at a cost of \$30 million, was completed in March 2022.<sup>[10]</sup>

### Redcliffe safety works

A project to provide safety works at five intersections in Redcliffe, two of which are on Anzac Avenue, were underway at March 2022.<sup>[11]</sup>

## Major intersections

The entire road is in the Moreton Bay Region local government area.

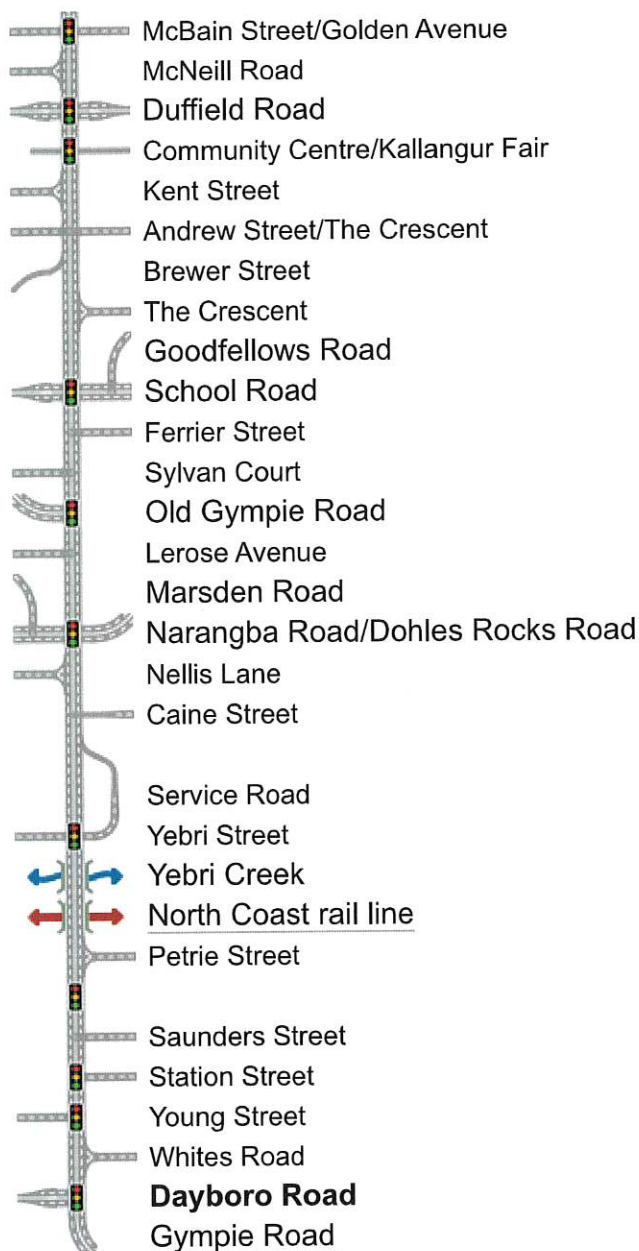
Location	km <sup>[12]</sup>	mi	Destinations	Notes
<u>Petrie</u>	0	0.0	<div><div><div>58</div></div><div>Gympie Road (State Route 58) south-east – Strathpine, Brisbane /</div><div><div>58</div></div><div>Dayboro Road (State Route 58) north-west – Dayboro</div></div>	Western terminus of Anzac Avenue and State Route 71
<u>Kallangur</u>	5.6	3.5	<div><div><div>M1</div></div><div>Bruce Highway (National Route M1) south – Brisbane / north – Sunshine Coast</div></div>	Interchange
<u>Rothwell</u>	10.4	6.5	<div><div><div>26</div></div><div>Deception Bay Road (State Route 26) north – Sunshine Coast, Nambour</div></div>	Western concurrency terminus with State Route 26
<u>Kippa-Ring</u>	14.6	9.1	<div><div><div>26</div></div><div>Elizabeth Avenue (State Route 26) south – Clontarf, Brisbane / Boardman Road north – Newport</div></div>	Eastern concurrency terminus with State Route 26, which continues south along Elizabeth Avenue
<u>Redcliffe</u>	17.1	10.6	<div><div><div>27</div></div><div>Oxley Avenue (State Route 27) south – Margate, Brisbane / north – Scarborough</div></div>	State Route 71 eastern terminus
	17.8	11.1	Redcliffe Parade north – Scarborough / Marine Parade south – Margate	Roundabout; Anzac Avenue eastern terminus
1,000 mi = 1.609 km; 1,000 km = 0.621 mi <div><input type="checkbox"/> Concurrency terminus · <input type="checkbox"/> Route transition</div>				

### Anzac Avenue

[show]







## See also



- Harry Coyne

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## External links

Media related to Anzac Avenue, Queensland at Wikimedia Commons

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# King George V Avenue of Memorial English Oaks

From Wikipedia, the free encyclopedia  
(Redirected from King George V Memorial Avenue)

The **King George V Avenue of Memorial English Oaks** is a heritage-listed memorial avenue at King George V Memorial Avenue (East), Tamworth, Tamworth Regional Council, New South Wales, Australia. It was designed by Tamworth Council and Community and built during 1936 by Tamworth Progress Association, Tamworth Rotary, Tamworth Community and Council. It is also known as **Lower Nemingha Road**. It was added to the New South Wales State Heritage Register on 12 March 2014.<sup>[1]</sup>

## History


### Establishment

The history of the avenue was found amongst various newspaper articles on microfiche (dating from 1936) and historical publications held at the Tamworth Regional library. Further articles were supplied from members of the public.<sup>[1]</sup>

On 29 February 1936 at the request of the townspeople, the Mayor of Tamworth convened the first public meeting to decide on a memorial to King George V. The idea to establish a living memorial to the late king by planting an avenue of English oak trees was discussed and a memorial avenue was thought to be a fitting tribute to the much loved king as he had been a lover of trees. It was also thought that the avenue should be of English oaks which, even though they are slow growing, they live to a great age, were beautiful trees and also symbolic of the link to England. Oak trees were also used as a symbol of honour for the English monarchy.<sup>[1]</sup>

Originally it was planned for the avenue to run from town along the Upper Nemingha Road (now the New England Highway), across the Two Mile Bridge over the Peel River, back along the Lower Nemingha Road (now King George V Memorial Avenue) and into town over the river via the Paradise Bridge.<sup>[1]</sup>

King George V Avenue of Memorial English Oaks



Location of King George V Avenue of Memorial English Oaks in New South Wales

Location	King George V Memorial Avenue (East), Tamworth, Tamworth Regional Council, New South Wales, Australia
Coordinates	<span><span><span><span><span>31°06′27″S</span> <span>150°56′40″E</span></span></span></span></span>
Built	1936
Architect	Tamworth Council and Community

New South Wales Heritage Register

Official name	King George V Avenue of Memorial English Oaks; Lower Nemingha Road
Type	State heritage (landscape)



It was estimated that 318 trees would be required and the cost was going to be A£300. This was felt to be an amount that was well within the means of the community of Tamworth. The population of Tamworth in 1936 was 11,000 and the committee felt that the cost of 15 shillings per tree was small and that perhaps school children and other organisations in town would desire to be represented. School children were seen to be important to be involved for it was they who would take up the task of caring for the avenue in the future.<sup>[1]</sup>

The location of the avenue was selected for a number of reasons. Firstly the Lower Nemingha Road was chosen as it was not a Main Roads Department road. This meant the trees could be planted close enough together to form an effective avenue. At that time NSW Main Roads required all roadside trees to be planted at least a chain distant from the road on each side and the effect of this on an avenue would be disheartening. It was also noted that as the Lower Nemingha Road was on a flood plain with the excellent soils and regular flooding it would be a place where English oaks would grow well. The committee decided that the trees would be planted at a distance of 13 metres (44 ft) apart with a gap of 11 metres (36 ft) for the roadway and at these distances it was expected that the foliage would interlace overhead forming a cathedral like arch.<sup>[1]</sup>

By April 1936 99 trees had been promised by Tamworth residents, businesses and community groups including the CWA, RSL and the Light Horse Brigade. Around this time the Main Roads Department of NSW announced that they were currently surveying all main roads from Sydney to Wallangarra with the intention of planting trees along the main access roads into towns. This changed the decision to plant the oaks on the main northern entrance road into town and the committee decided instead that signposts were to be erected on the highway so tourists could take a scenic detour into town via the avenue. This detour was called the "Round Drive" and the lower Nemingha Road was renamed King George V Memorial Avenue.<sup>[1]</sup>

By 25 June 1936 there were only 15 trees left to source and then the work on the avenue would start immediately. It was announced at that meeting that the opening and dedication of the avenue would occur during the Tamworth's Diamond Jubilee celebrations in October 1936. Tamworth City Council donated the remaining 15 trees.<sup>[1]</sup>

## Subsequent developments

In the 1950s the Paradise Tourist Park was built by Tamworth City Council at the end of the avenue and King George V Memorial Avenue has been used ever since as a recreational amenity by thousands of townsfolk and visitors each year.<sup>[1]</sup>

The devastating 1955 floods washed away the Two Mile Bridge which has never been replaced. The community of Tamworth turned out to clean up the debris from the avenue as part of the post flood clean up. Since then the only access to the avenue has been via the Paradise Bridge (next to the Paradise Tourist Park) close to town. This meant that King George V Avenue became more important as a quiet place to be visited and the avenue has become one of the main wedding and school formal photographic sites in town as well as being a quiet place for workers to have their lunch under the trees.<sup>[1]</sup>

<b>Designated</b>	12 March 2014
<b>Reference no.</b>	1922
<b>Type</b>	Tree groups - avenue of
<b>Category</b>	Parks, Gardens and Trees
<b>Builders</b>	<ul style="list-style-type: none"> <li>Tamworth Progress Association</li> <li>Tamworth Rotary</li> <li>Tamworth Community and Council</li> </ul>

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In 1988 Tamworth City Council and the Department of Environment and Planning contracted Jonathan Falk Planning Consultants Pty Ltd to conduct a heritage study of Tamworth. Their report states that the avenue was also an important memorial to servicemen killed in World War I. In 1936 the *Northern Daily Leader* reported that the RSL and the Light Horse Brigade donated monies to purchase some of the trees for the avenue.<sup>[1]</sup>

In 1992 after years of public pressure Tamworth City Council agreed to establish an official register of significant trees. The Council called on members of the public to advise on which trees they believed should be protected and the reasons why. After much community consultation EJE Landscape Consultants from Sydney produced the Register of Significant Trees for Tamworth City Council in 1993 which included the King George V Memorial Avenue of English Oaks.<sup>[1]</sup>

In March 2004 Tamworth City Council proposed to remove the trees on the avenue due to ongoing decay of the trees and the forward planning for an access road to future subdivisions at Calala. The plan was to remove the trees and replant with 5–10 metres (16–33 ft) high English oaks at a cost of \$350 - \$2500 each. This caused huge public outcry and a petition of 3,000 signatures was quickly collected resulting in no further action being taken.<sup>[1][2]</sup>

In August 2010 a development application (DA) was lodged with TRC to use King George V Avenue as the access route for a major subdivision of 500+ lots. This proposal spurred an ongoing campaign by the community and its visitors to save this much loved and historic avenue. Due to the age of the trees and the narrow distance between the trees any increase in traffic flow would mean eventual road widening and loss of the trees as well as the loss of the peace and tranquility afforded by the trees and quiet location.<sup>[1]</sup>

In November 2011 another DA was lodged with council to trench through the root protection zone of the trees in order to place a wastewater pipeline. The decision whether to approve this pipeline was deferred in December 2012 pending a comprehensive arborist report as the initial report submitted with the DA did not comply with the Australian Standard AS4709 2009 Protection of Trees in Development zones. The DA was subsequently withdrawn.<sup>[1]</sup>

In 2011 a valuation, commissioned by the community, by Thyer Amenity Tree Valuation Services valued the avenue to be worth millions of dollars to the community for its amenity, aesthetics and historic value. Its aesthetic values is evidenced by its prolific use as a backdrop for commercial and personal photography and its amenity values lie in its use for personal and club fitness activities. Over the years this avenue has become one of the most beautiful tourist attractions Tamworth has to offer.<sup>[1]</sup>

In February 2013 the *National Trust of Australia (NSW Branch)* listed the avenue as one of State significance as a rare example of an avenue of English Oaks in NSW and the only one carefully planted to grow and produce an interlocking cathedral like effect from the branches joining overhead. It is of historical significance as it was planted as a memorial to King George V in 1936 from the last of the eras when English Oaks were used for street tree plantings and commemorative plantings.<sup>[1]</sup>

From the first decision to plant the avenue to their care and now the current campaign to save the trees King George V Memorial Avenue has been an important part of Tamworth's history for 77 years. It represents a time in history after the Boer War and World War 1 when avenues of honour were popular with communities. After WWI the interest in living memorials waned. It is also a representative of the last era when English Oak trees were commonly used for road side plantings, their use declining due to the difficulty in selecting areas where they would grow successfully.<sup>[1]</sup>



In March 2014 the avenue was listed on the NSW State Heritage Register.<sup>[1]</sup>

## Description

The surrounding land consists of flat alluvial flood plain used for a variety of agricultural purposes, including grain crops, lucerne and livestock grazing. Some of these fields are irrigated using water drawn from the adjacent Peel River. A small number of farm houses are located along the roadway.<sup>[1][3]:9</sup>

### Avenue

The original planting in 1936 comprised 318 trees which were planted along the Lower Nemingha Road (renamed King George V Memorial Avenue).<sup>[1]</sup>

King George V Avenue is divided into two sections - the main section runs for 1.5 kilometres (0.93 mi) from the south east end of the main street (Peel Street) heading in a south easterly direction. This section comprises 200 trees of which 140 are of the original planting as well as 60 replacement trees of varying ages. There are 99 trees on the western side and 101 on the eastern side. These trees form a nearly continuous cathedral-like canopy for 1.5 kilometres (0.93 mi) as per the original concept ) for the planting.<sup>[1][4]</sup>

### Secondary Avenue

After 1.5 kilometres (0.93 mi) the avenue takes a 90 degree turn to the north- east and runs for 0.5 kilometres (0.31 mi) in a straight line to the Peel River, where the road used to cross via the Two Mile Bridge onto the Upper Nemingha Road (now the New England Highway). The bridge was closed to vehicles sometime between 1936 and when it was washed away in the 1955 floods). Since that time this section of the road has been closed off and used to graze stock. This section of the avenue still has 41 of the original 70 trees. No replanting of the trees in this section has been undertaken.<sup>[1]</sup>

The trees are planted 13 metres (44 ft) apart with a gap of 11 metres (36 ft) for the roadway. The trees are planted 1m off the road. The growth of the English Oak is such that the foliage has interlaced overhead forming an arch as per the original intent of the avenue. The avenue then used to extend 100 metres (330 ft) from Two Mile bridge to the Upper Nemingha Road until recently when the trees were removed in 2012 to make way for a carpark and entrance to a church.<sup>[1]</sup>

### Condition

As at 22 April 2013, the condition of the avenue ranges from excellent to fair depending on the tree. As a whole the avenue is in good condition despite the poor care and management practices to date.<sup>[1]</sup>

In 2009 the Australian Tree Consultants (ATC) were commissioned to assess the first half of the longer section of the avenue and found by them to be in varying conditions of health.<sup>[5]</sup> In their opinion the trees examined ranged in condition from excellent to over-mature. They also found that the main reason for the relatively recent reduction in the health of the trees has been due to the inappropriate tree lopping practices by energy companies.<sup>[1]</sup>

These lopping practices are still being carried out and despite assurances in writing, that the trees would only be pruned in winter to minimise the damage, once again Essential Energy tree crews were pruning the avenue in the recent spring. This is despite their own vegetation management

plan which states in section 7.1 "Significant, special character, protected, memorial and heritage trees may require more frequent trims to minimise impact or the consideration of alternative solutions as detailed in the section of this plan called Alternatives to Pruning."<sup>[1][6]</sup>

Australian Tree Consultants reported that an ongoing program of care and replacement would ensure the avenue could be maintained in good condition for many years to come.<sup>[1][5]</sup>

Port Arthur has historic oak trees that are estimated to be 150 years old and despite health issues caused by soil compaction (from tourist access) - they were assessed to have at least another 50+ years left if cared for appropriately.<sup>[1][7]</sup>

The second and shorter section of the avenue has 40 of the 70 original trees still in existence. These trees were grazed on by stock until steel barriers were installed some years ago. Since that time the trees have partially recovered with some magnificent specimens. They also do not have the regular poor pruning practices carried out by the power companies contributing to their damage.<sup>[1]</sup>

In October 2015 an inspection by Andrew Morton of Earthscape Horticultural Services revealed that sections were succumbing to significant decline in health, evidenced by:<sup>[1]</sup>

- a number of completely dead trees;
- substantial crown dieback;
- production of epicormic growth;
- substantial pest infestation which has led to branch failures and in the worst cases, collapse of all major primary limbs.

There is also evidence that trees have been declining for some years, indicated by a large no. of gaps in the original avenue (particularly in the section of unformed road running perpendicular to the main avenue) and a number of recent plantings undertaken to fill the gaps left by trees that have been removed. The integrity of the avenue is good.<sup>[1][3]:19</sup>

## Modifications and dates

Since the planning and subsequent 1936 planting of the avenue by the community of Tamworth, the following modifications have been made:<sup>[1][8]</sup>

- Early 1950s to present day – Paradise tourist park opened at the end of the avenue. Thousands of visitors each year enjoy the shade and amenity of the avenue
- 1955 – Loss of the Two Mile bridge at the other end of the avenue which stopped the road being used as a detour tourist route into town
- 1955 – major floods leaving masses of debris along the avenue
- 1960—70s – installation of high voltage power lines along both sides of the avenue
- 1970s—present day – damaging tree lopping practices by the energy companies
- 1988 – Tamworth Heritage study by Falk Consultants Pty Ltd found that the avenue is also an important memorial for WWI
- 1992 – Tamworth City Council (TCC) responded to community concerns about loss of trees in town by calling for submissions for trees to be added to a significant tree register citing King George V Avenue as the example of trees to be registered
- 1993 – TCC significant tree register (STR) published. The normal practice from here is for the trees to be placed on the LEP as heritage items. This has not been done to date
- Mid 2000 – major upgrade to high voltage powerline along the eastern side of the avenue with the resultant ongoing reduction of the canopy by pruning



- 2009 – metal barriers erected to protect the 40 remaining trees on the shorter section of the avenue. This was done before this section was allowed to be closed off and used to graze stock by the two adjacent farms. The road has been kept as a designated public road to allow visitors to access the trees
- 2010 – submission of a DA to use King George V Avenue as the major access road to a planned residential subdivision with a traffic flow predicted in excess of 3,000 cars per day. The arborist report with the DA stated that the avenue would not sustain constant use as a major traffic route
- June 2011 – submission to council for an upgrade to the power lines that run both sides of the avenue to enable power to be sold to developers
- November 2011 – submission to trench a waste water pipeline beside the avenue for its entire length without the appropriate arborist reports showing compliance with the Australian Standard for the Protection of Trees in development zones AS4970 2009. This pipeline DA was considered by the Joint Regional Planning Panel in December 2012 and decision deferred pending a complete and appropriate arborist report
- 2012 – the last remaining oak trees from the other side of where the Two Mile bridge used to be up to the New England Highway were removed to make way for a carpark and entrance to a church.
- August 2012 – TreeAH was used as a tool to evaluate the heritage significance of the avenue. This was presented at the International Society of Arborists annual conference in Portland by Mark Wadey from Barrell Tree Consultancy<sup>[9]</sup>
- September 2012 – extensive tree pruning by Essential Energy contractors in spring despite a letter from the company stating they will only do these damaging practices in winter when the trees are dormant
- November 2012 – DA for stage 1 of the Peel River Estate approved by Tamworth Regional Council for the first 104 lots. Second DA up for public exhibition (closing date 7/1/13) for the next 46 lots. Once 150 lots are approved the Peel River Estate must decide on a second access road to the planned development of 500 lots. To date the traffic plans submitted with the DA's are to use King George V Avenue as the major access to the development. The road in its current form does not comply with AMCORD regulations for road safety and its use as an access will necessitate road widening with the removal of 100+ trees<sup>[10]</sup>

At various dates the community have replanted trees as evidenced by the differing ages of the replacements and there is a regular watering program of the younger trees carried out by the community during dry periods. Adjacent lucerne farmers allow irrigation water to go over the fence to water the avenue. Major floods have occurred approximately every 3 – 5 years apart from years when there are long and severe droughts. The oak trees have survived many floods and numerous droughts since their planting and the major cause of their ill health and loss over the years has been the poor pruning practices by the energy companies. They now face an even greater threat from the proposed access road and pipeline.<sup>[1]</sup>

## Further information

The integrity is good to excellent.<sup>[1]</sup>

At the first public meeting about the avenue on 28 February 1936 the townspeople and the Town Beautification and Progress Association agreed that a memorial avenue of English oak trees should be planted in honor of King George V.<sup>[4]</sup> It was also decided that for an avenue to be effective the trees should be planted close to the roadway. The Lower Nemingha Road (later renamed to King George V Avenue) was selected because the trees could be planted close enough to the road so that when they reached maturity they would join overhead to form a cathedral-like canopy.<sup>[1]</sup>



The avenue has formed this desired canopy and it is still nearly continuous along the 2 kilometres (1.2 mi).<sup>[1]</sup>

The 1936 meeting also decided that the town to create a scenic drive close to town to which visitors could be taken. The "Round Drive" still exists but the final 0.5 kilometres (0.31 mi) section is no longer driveable due to the loss of the Two Mile bridge back over the river in the 1955 floods with this portion of the road subsequently being closed to traffic.<sup>[1]</sup>

Changes since 1936 have been:<sup>[1]</sup>

1. The installation in the 1960-70's of substantial high voltage power lines along the both sides of the avenue. This has necessitated the subsequent extensive and damaging lopping by the energy companies; and
2. The use of the avenue by the occasional high vehicle has also resulted in damage to the canopy.

## Heritage listing

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The Avenue is of state heritage significance for its aesthetic values as the carefully planned planting has allowed the distinctive growth habit of oak trees to form a cathedral or tunnel like effect as the branches have grown and interlocked over the roadway, making the avenue aesthetically distinctive. It is also one of the longest avenues in NSW being two kilometres (one point two miles) long. Being the only avenue of oak trees planted in NSW, the avenue is aesthetically distinctive and has unique landmark qualities.<sup>[1]</sup>

The King George V Memorial Avenue of English Oaks of State heritage significance for its rarity values as the only Avenue of Oaks in NSW. It is the only avenue of oaks dedicated as a living memorial to King George V from the last era where avenues of trees were used to mark historic events and people. It is a rare example of a substantially intact avenue of oaks still surviving in NSW and possibly in Australia.<sup>[1]</sup>

Its rarity values are enhanced as the avenue is one of only two memorial avenues to King George V in NSW, the other being an avenue of poplars in Braidwood which does not have the same aesthetic qualities as the avenue of oak trees.<sup>[1]</sup>

The item is of state heritage significance as a good representative example of a memorial avenue where this type of planting was enthusiastically embraced by Australian communities for commemorative plantings.<sup>[1]</sup>

King George V Avenue of Memorial English Oaks was listed on the New South Wales State Heritage Register on 12 March 2014 having satisfied the following criteria.<sup>[1]</sup>

**The place is important in demonstrating the course, or pattern, of cultural or natural history in New South Wales.**

The avenue is of local heritage significance as a memorial planting planned and organised by Tamworth Council and community as an expression of their appreciation of the benevolent rule of the British monarch King George V after his death in January 1936. The avenue planting project, actively supported by Rotary, and the Tamworth Beautification and Progress Association, is also of local historic significance as the first community project by any service clubs in Tamworth.<sup>[1]</sup>

**The place has a strong or special association with a person, or group of persons, of importance of cultural or natural history of New South Wales's history.**



The historic significance of the King George V Memorial Avenue of English Oaks is enhanced through its association with the local community and its expression of admiration and respect for King George V after his death in 1936. It is also locally important through its association with the local service clubs as their first community project.<sup>[1]</sup>

**The place is important in demonstrating aesthetic characteristics and/or a high degree of creative or technical achievement in New South Wales.**

The Avenue is of aesthetic significance at a State level as the carefully planned planting has allowed the distinctive growth habit of oak trees to form a cathedral or tunnel like effect as the branches have grown and interlocked over the roadway, making the avenue aesthetically distinctive. It is also one of the longest avenues in NSW being 1.5 kilometres (0.93 mi) long. Being the only avenue of oak trees planted in NSW, the avenue is aesthetically distinctive and has unique landmark qualities.<sup>[1]</sup>

**The place has strong or special association with a particular community or cultural group in New South Wales for social, cultural or spiritual reasons.**

The King George V Avenue of Memorial English Oaks is of local heritage significance for its association with the Tamworth community the forebears of which designed and planted to a loved king. The public amenity of the avenue and its recreational values are important to the community and contribute to the sense of place in Tamworth.<sup>[1]</sup>

**The place possesses uncommon, rare or endangered aspects of the cultural or natural history of New South Wales.**

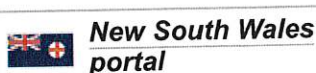
The King George V Memorial Avenue of English Oaks is of State heritage significance as the only Avenue of Oaks in NSW and the only avenue of oaks dedicated as a living memorial to King George V from the last era where avenues of trees were used to mark historic events and people. It is a rare example of a substantially intact avenue of oaks still surviving in NSW and possibly in Australia.<sup>[1]</sup>

This avenue is one of only two memorial avenues to King George V in NSW, the other being an avenue of poplars in Braidwood which does not have the same aesthetic qualities as the avenue of oak trees.<sup>[1]</sup>

**The place is important in demonstrating the principal characteristics of a class of cultural or natural places/environments in New South Wales.**

The item is of state heritage significance as a good representative example of a memorial avenue where this type of planting was enthusiastically embraced by Australian communities for commemorative plantings.<sup>[1]</sup>

## See also



## References

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# War Memorial Parks and Gardens

Introductions to Heritage Assets





# Summary

Historic England's Introductions to Heritage Assets (IHAs) are accessible, authoritative, illustrated summaries of what we know about specific types of archaeological site, building, landscape or marine asset. Typically they deal with subjects which lack such a summary. This can either be where the literature is dauntingly voluminous, or alternatively where little has been written. Most often it is the latter, and many IHAs bring understanding of site or building types which are neglected or little understood. Many of these are what might be thought of as 'new heritage', that is they date from after the Second World War.

This short guide provides an introduction to the memorial parks and gardens built as war memorials, principally after the First World War.

This guidance note has been written by David Lambert, The Parks Agency, and edited by Paul Stamper.

It is one of several guidance documents that can be accessed  
[HistoricEngland.org.uk/listing/selection-criteria/listing-selection/ihas-buildings/](https://HistoricEngland.org.uk/listing/selection-criteria/listing-selection/ihas-buildings/)

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[HistoricEngland.org.uk/listing/](https://HistoricEngland.org.uk/listing/)

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**Front cover: Memorial Park, Fleetwood**

Reproduced courtesy of Harrison Phair photography and Wyre Council.

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# Introduction

The First World War changed the nature of commemoration. The memorials of previous conflicts generally took the form of monuments, some of which were located in a pre-existing park, and they were often funded by regiments or wealthy individuals and sometimes by the lord lieutenant (Fig 1). After the First World War ended, the scale of the human loss demanded a different scale of commemoration.

It also demanded a different type of commemoration. While many cities, towns and villages favoured a traditional sculptural or architectural monument, many others (often with ex-servicemen taking the lead) discussed and opted for a memorial which, instead of focussing on the dead, would serve the needs of the living. The arguments often seem to have reflected political divisions, drawing on Lloyd



**Figure 1**  
The South African War Memorial at Crewe of 1904 (listed Grade II) within the Grade II\*-registered Queen's Park. Prior to the First World War, war memorials were generally erected by regiments or wealthy individuals.

George's famous vision of homes fit for returning heroes, and on the expectation that public health, housing and working conditions would be transformed in the wake of the War. Such 'living memorials' included homes for bereaved service families or for ex-servicemen, cottage hospitals or hospital wings, public baths, libraries, reading rooms, club rooms and memorial halls; even road improvements and bridges were proposed as a form of war memorial.

Parks, gardens, playing fields and avenues fell into this category of living or useful memorials. They provided not only for veterans and widows, but also for the next generation of young people, offering in the words of one dedicatory speech, a place where 'all people, young and old, could enjoy the beauties of nature in lovely surroundings, near to the centre of the town.' They also had a spiritual dimension: in the words of the War Memorials Advisory Council which was set up by the Royal Society of Arts in 1944:

'For the whole population the smooth current of peacetime life and the contentment of a quiet mind are shattered by the hideous calamity of war. Nature herself can best restore the balance which man's misguided mechanical ingenuity has so cruelly disturbed.'

The choice of a public park, garden or recreation ground also reflected what was often a lack of open space in new urban areas or in villages lacking sports facilities, where it stems from a pre-war move to create recreation grounds to meet the growing interest in health and the outdoors. Their geographical spread is wide but restricted to areas where land, unless gifted, was available for purchase. As a result, few memorial parks were laid out in older urban areas; it has also been noted that larger towns and cities often favoured



substantial building projects such as a museum or hospital as a war memorial.

Memorial parks and gardens are generally, though not always, modest in terms of design and materials, and were often laid out by the borough surveyor working with a local nursery. They tend to have more provision for sports and games than the public parks of the previous century, and a looser, less rigid hard-landscape structure. This partly reflected budgets but also a new culture of open-air recreation and activity.

Numbers are still unclear. There are currently 339 gardens and 212 parks or playing fields listed on the Imperial War Museum War Memorials Archive, but it appears likely that there are still more to be recorded. At a national level, Fleetwood Memorial Park in Lancashire, Gheluvelt Park in Worcester and Coventry War Memorial Park are included on Historic England's *Register of Parks and Gardens of Special Historic Interest* at Grade II. Rowntree Park, York, which was originally dedicated as a memorial park after the First World War, is also included at Grade II. Astley Hall Park and Clitheroe Castle grounds (both in Lancashire) were both acquired by local authorities as memorial parks after the First World War, and are both registered at Grade II, but not principally for that memorial function.

In addition, the *Register* also contains two Grade II-registered war memorial gardens: Geoffrey Jellicoe's intimate and subtle War Memorial Gardens in Walsall, opened in 1952, and the War Memorial Gardens at Nottingham, opened in 1927. The latter should arguably be considered a park: the registered site comprises 2.7ha, but this in fact is only the ornamental core of the total area of land donated by the local industrialist Sir Jesse Boot in 1920. In total this memorial landscape comprises about 14.7ha, of which 12ha were dedicated to recreation grounds and playing fields for the adjacent schools (Fig 2).

More research remains to be done on memorial parks and gardens as a type, and they have received surprisingly little notice in either the literature of war memorials, or in surveys of twentieth-century landscape and garden design.

Over the years, architectural and sculptural memorials have attracted greater attention in terms of historic interest and conservation than memorial landscapes. However, those monuments are often physically set in a garden or park which is integral not only to their setting and enjoyment but to their cultural meaning. The open space and the monument provided for different aspects of memorialisation and different, but complementary, needs in the community. To focus only on the monument and its generally sombre character is to overlook the extent to which mourning was balanced by a desire to look forward, and the extent to which both post-war periods were coloured by a political determination to secure a better future.

While, as will be seen, most war memorial parks and gardens originated after the First World War, a significant number were also created as Second World War memorials. In this advice, the emphasis is on designed landscapes created after the end of the First World War, although it does look ahead to what happened after later conflicts. Brief notice is also given to wider memorial landscapes, although the topic lies beyond the scope of the present document.



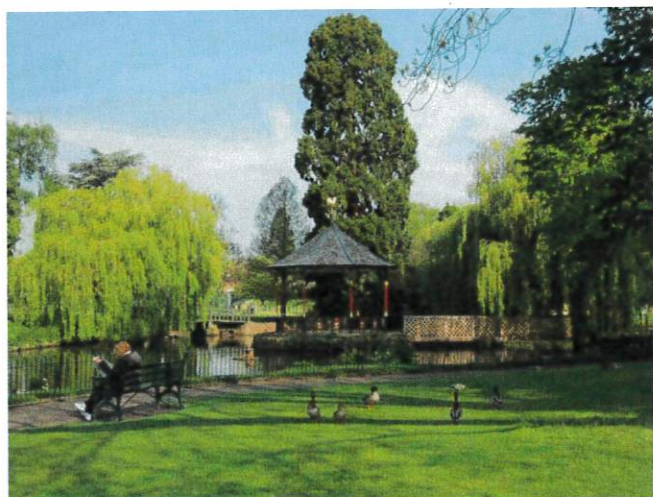
**Figure 2**  
Nottingham Memorial Gardens. The Grade II-registered gardens are only the core of the memorial landscape, most of which comprises playing fields for the neighbouring schools. The Memorial Arch, unveiled in 1927, is Grade II-listed.



# 1 History and Character

## 1.1 Terminology and definitions

War memorial parks and gardens comprise a range of different types of designed landscape, varying widely in size and design. Some are small sites, designed as no more than the settings to a sculptural or architectural memorial; some are gardens in which such a memorial is an important but subsidiary part, often in its own planted setting; some are public parks largely comprising sports pitches; and some are parks with a range of traditional amenities such as bandstands, lakes and ornamental planting alongside the usual provision for sports such as tennis or bowls (Fig 3). The typology should also include memorial avenues and bigger planting schemes such as the Whipsnade Tree Cathedral (Bedfordshire) and the National Arboretum at Alrewas (Staffordshire), where 'our nation remembers.'



**Figure 3**  
Gheluvelt Park, Worcester (registered Grade II), named after the 1914 battle in which the Worcester Regiment played a distinguished part. Opened in 1922, its character is largely that of a typical late Victorian or Edwardian public park.

Complicating a general lack of historical awareness, a number of these parks no longer have 'war' or 'memorial' in their common name. Full dedicatory names associated with memorial recreation grounds or playing fields are quite often dropped as a matter of common usage. But the names of parks can also change: as referred to above, Rowntree Memorial Park in York is now known as just Rowntree Park (Fig 4); Carr Bank Memorial Park in Mansfield (Nottinghamshire) is now Carr Bank Sculpture Park, while in several examples, such as Gheluvelt Park, Worcester, or the very recent Chavassee Park in Liverpool, the memorial origins are not explicitly reflected in the name.

Inevitably, given the local nature of their development and subsequent maintenance, the taxonomy of these memorial landscapes is inconsistent. War memorial parks, war memorial playing fields,



**Figure 4**  
Rowntree Park, York (registered Grade II), an early photograph taken when its name still included the word 'Memorial'.



war memorial garden or gardens, and gardens of remembrance, are all names which are interchanged. In some places, both 'park' and 'garden' are in current usage for the same site.

The names of memorial landscapes reflect the size of the site but there is no consistent threshold: Sileby War Memorial Park (Leicestershire) is 1.5ha., while Kirkham Memorial Gardens (Lancashire) are 4.5ha (and often referred to as Memorial Park). The names more often reflect the use of the site: a quiet, contemplative space, with formal features tends to be thought a garden, while a more active area, with a predominance of sports facilities, tends to be thought a park.

A memorial garden may be a small separate garden in a village, town or city, or it may be an enclosure within an earlier park such as the Memorial Gardens laid out around the war memorial in the recently restored Clifton Park, Rotherham (South Yorkshire). Memorial gardens generally contain ornamental planting and an architectural monument as a focal point.

Confusingly, while used for public gardens, it should be noted that the terms 'memorial garden/s' or 'garden/s of remembrance' are also frequently used for sites dedicated to the interment or scattering of ashes, unconnected with war memorialisation. These need to be distinguished from similarly named sites whose purpose is recreation. They are generally located in cemeteries or crematoria grounds and should be considered a sub-group of cemeteries rather than public parks.

To add to the confusion, there are examples of cemeteries which have been re-named Memorial Parks: West Norwood Cemetery and Crematorium (in the London Borough of Lambeth), was temporarily known from the 1970s to the 1990s as West Norwood Memorial Park, and the registered Flaybrick Memorial Park in (Lancashire) is a nineteenth-century cemetery. St Martin's Memorial Park in Tipton (West Midlands) is a closed churchyard.

Given that the terminology is inconsistent, it may be helpful to propose a typology for war memorial landscapes, regardless of name.

A provisional breakdown might include:

- Small garden settings to war memorials, under 0.5ha
- Ornamental gardens containing war memorials with no sports or games facilities, 0.5ha-2ha
- Public parks chiefly comprising sports pitches (recreation grounds), 2-5ha
- Public parks with a traditional range of amenities (for instance, bandstand/ornamental lake/café/toilets/ornamental planting), as well as limited sports provision (tennis, bowls), 2-10ha
- Large public parks with typical park facilities but with majority of space dedicated to sports provision, any size
- Other kinds of dedicated public open space (for instance, countryside), any size

## 1.2 Public parks and commemoration

As venues for large-scale events, public parks played their part in Armistice Day and Peace Day celebrations in November 1918 and July 1919. On 23 November 1918, fifteen thousand wounded ex-servicemen gathered in London's Hyde Park to be publicly thanked by the King. This was also the scene of a gigantic choral celebration on 24 May 1919 with an Imperial Choir of ten thousand singers with massed military bands and fireworks over the Serpentine, witnessed by vast crowds including the King and Queen. In Huddersfield the programme for Peace Day focussed on a procession from the Town Hall to Greenhead Park; in Stockport over twenty thousand children wearing fancy dress gathered in Alexandra Park, Vernon Park and other open spaces to sing hymns and patriotic songs accompanied by bands; in Rochdale there was dancing to the bands in the parks; and in Hackney the Peace Day celebrations included processions of schoolchildren to Victoria Park, Springfield Park and the Downs.



Parks also provided the venue for counter-demonstrations: a 'jarring note' was struck in July 1919 by a march in Manchester of unemployed ex-servicemen 'a battalion strong and more' from Albert Square to Platt Fields, while two days after the royal visit to Hyde Park in May 1919 it was the scene of a rally of ex-servicemen demanding work and a minimum wage, which ended with rioting in Parliament Square.

Parks were of course already established as a repository for monuments of one sort or another, commemorating local or national figures or events, and after the First World War many authorities chose their principal park as the site for a war memorial. Examples of fine war memorials inserted into older landscapes include Edwin Lutyens' arch in Victoria Park, Leicester (Listed Grade I) and his cenotaph in Watts Park, Southampton (Listed Grade II\*). Others include those in Weston Park, Sheffield; Victoria Park, Widnes; Ashton Gardens, St Anne's on Sea; Albert Park, Middlesbrough; Barrow Public Park (Fig 5),



**Figure 5**

An example of a First World War memorial in an older park: the Grade II-listed memorial in Barrow Public Park (Cumbria), erected in 1919 to the 616 men of the town who died in the conflict.

Christchurch Park, Ipswich; and Central Park, in the London Borough of Newham, all of which have received HLF park restoration grants in recent years.

### 1.3 Parks as war memorials

The decision over what form a war memorial should take was generally made by a local war memorial committee, of which thousands were formed towards the end of and after the First World War in cities, towns and parishes across the UK. These were generally set up after a public meeting called by a civic leader such as a mayor or council chair, who would then convene a steering committee, but generally they remained independent of local authorities. In addition to determining the form of the memorial they were also responsible for the fund-raising required to meet the cost of construction: it was widely considered an important part of the memorialisation that fund-raising should be voluntary rather than draw on public funds. This independence was felt to be a strength: when in 1922 a gigantic national memorial on the corner of Hyde Park was proposed by the artist Frank Brangwyn, one of the scheme's opponents, H G Watkins, argued in the *Architects' Journal*:

'Since the war the outstanding feature of the great movement to erect war memorials in this country had been the universality of the smaller monuments, and the multiplicity of these in villages, churches, clubs, etc., which was very characteristic of the love of home and the individualistic spirit of the British people.'

The choice of memorial varied widely, and can be divided broadly into monumental and utilitarian. Many favoured an architectural monument which would possess the necessary gravitas, feeling uneasy about more utilitarian proposals. A leader in the *Hackney Gazette* for 23 May 1919 remarked:

'A Memorial should be one which the public could not fail to associate with the Great War, and its object, from this point of view, should be unmistakable. We are afraid that



some of the schemes suggested – notably at Shoreditch, where an extension of the public baths is being advocated – scarcely answer to the description of a Memorial at all, however excellent they might be as monuments of municipal enterprise.’

But others chose to focus on the future. The Coventry war memorial appeal, to provide a new park, argued that provision for games and exercise would be ‘of the greatest value in the healthy development of the young people of the City’, while the speech of dedication at Rockley Memorial Park (Nottinghamshire) in 1927 referred to it as ‘a memorial which would endure, be worthy of the sacrifices made, and give joy to generations to come.’

The park movement had evolved into a new phase by the early 1920s. The National Playing Fields Association was formed in 1925 to champion ‘the vital importance of playing fields to the physical, moral and mental welfare of the youth of the country’, and the Victorian emphasis on formal horticultural display and passive recreation had given way to a more modern aesthetic based on exercise and sport. Throughout the 1920s and 1930s new parks reflected this emergent spirit which continued to be reflected in the design of the war memorial parks of the 1940s. Stylistically there was little development between the 1920s and the 1940s, other than a faint reflection of contemporary fashion: Arts and Crafts motifs for example are evident in a number of First World War memorial gardens, such as that in Broomfield Park (London Borough of Enfield) (Fig 6), while others contain garden features popular in the inter-war period such as rock gardens.

After the Second World War, commemoration was again organised by local war memorial committees, and again parks and gardens were often considered the most appropriate form of living memorial. Where public opinion was sought there is evidence of a very strong antipathy towards monumental memorial. While there was some debate after the First World War, it seems that objections to sculptural and architectural memorials had hardened by the 1940s. The



**Figure 6**

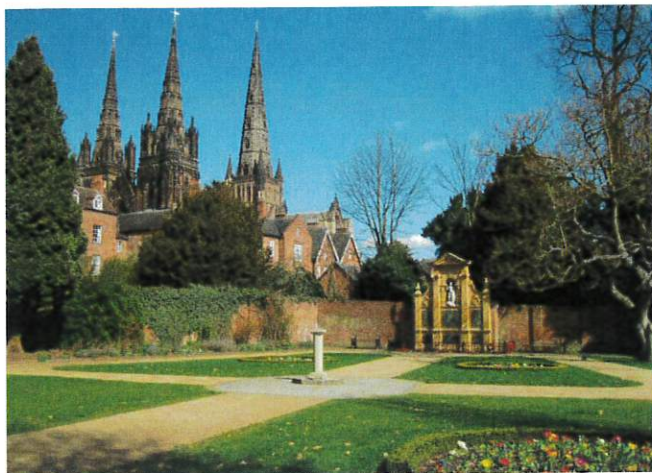
The memorial garden in Broomfield Park (London Borough of Enfield), a design influenced by the pre-war Arts and Crafts movement. Registered Grade II.

Mass Observation Bulletin for November 1944 recorded a common factor running through replies to questions about the form memorials should take after World War Two. Under the heading, ‘No Stone Memorials’ it reported a common theme, that ‘practically no one wanted costly erections in stone.’ ‘Most people wanted a memorial which would be useful or give pleasure to those who outlive the war’ and favoured ways of ‘commemorating the dead through the daily lives of the living.’ One soldier’s wife remarked, ‘Preserve us from the erections of the last war! If we must have memorials, they had better be parks, trees, libraries, things that [a] town or village **needs**.’ However, there were inevitably fewer such parks developed, as memorialisation frequently took the form of adding to an existing memorial, and in many places the local demand for a park had by this time been satisfied.

## 1.4 Gardens of remembrance

Gardens of remembrance or memorial gardens, characterised by a highly ornamental character created in hard and soft landscaping, were generally laid out either as new gardens (Fig 7), or as enclosures within older parks. Such gardens were intended, in the words of the War Memorials Advisory Council, to be ‘places of rest and meditation’. In the words of one London councillor recommending a new garden as a memorial:





**Figure 7**

The Garden of Remembrance, Lichfield (Staffordshire), opened in 1920, adjacent to but quite distinct from the adjoining Museum Gardens. It forms part of the Grade II-registered Cathedral Close and Linear Park.



**Figure 8**

The Garden of Remembrance in Corporation Park, Blackburn, unveiled in 1924. The park, registered at Grade II, was opened in 1857.

‘the laying out and maintenance of the enclosure as a beautiful little garden should be as much a part of the Memorial as the erection of a piece of sculpture. It should be treated worthily and reverently as a little piece of Stoke Newington belonging to the men who went from our Borough to fight for their native land. Here, where they themselves were wont to pass, flowers, through all the changing seasons of the year, would greet their memory.’

Good examples of First World War memorial or remembrance gardens inserted into earlier parks include Corporation Park, Blackburn in Lancashire (Fig 8); the Garden of Remembrance at Broomfield Park; the Garden of Remembrance, Clifton Park, Rotherham; and Towneley Park, Burnley. However, some memorial parks, such as Hyndburn (Lancashire), do contain a discrete Remembrance Garden. One loss has been the garden of remembrance at Wickford (Essex), destroyed when new flood defences were built along the boundary of the park in 1960. Although not explicitly a separate memorial, the rose garden at Fleetwood Memorial Park was probably designed with an awareness of the intensely symbolic nature of roses in the national grief after the First World War.

## 1.5 Designers and designs

As indicated above, as a type, designed memorial landscapes include a wide range of different forms, from small formal gardens to large expanses of playing fields. As noted above, they were generally laid out to a design by the borough surveyor or a local nursery firm. This was largely a matter of cost: because the funding was raised voluntarily it rarely provided for extravagance and, although labour was often cheaply provided through unemployment relief schemes, the specification for materials and features tended to be modest.

While there is rarely evidence of professional landscape designers being involved, there are exceptions. In 1925 Thomas Mawson produced a design for the adaptation of the late nineteenth-century recreation ground at Kirkham (Lancashire) as a memorial garden (Fig 9), and he was also consulted on the layout for the Memorial Park at Padiham near Burnley (Lancashire), opened in 1921, but in both cases the commission may have been due to his ownership of the local Lakeland Nurseries, rather than his international reputation. Barron and Son, founded by the leading nineteenth-century designer William Barron, was involved in the design of Heanor Memorial Park (Derbyshire) after the Second World War, but this again was probably due to Barrons being the leading local nurserymen. Elsewhere, Percy Cane



was responsible for rock and water gardens at Coventry War Memorial Park in 1926, while after the Second World War Geoffrey Jellicoe designed the 2ha. Walsall Memorial Garden, opened in 1952, Peter Shephard was responsible for an Anglo-American Garden of Remembrance at Tewkesbury (Gloucestershire), and Peter Youngman designed a memorial garden in the churchyard of St John's Church, in the London Borough of Croydon.

Modest budgets meant that gradual development was also characteristic of these parks. Funds were dependent on voluntary subscriptions as a matter of principle, and although occasionally a local authority would assist, economic conditions were difficult in the wake of both wars. An article on the opening of Padiham War Memorial Park refers to introducing further features 'when times come normal.' At Gheluvelt Park, a separate appeal was required to fund the monumental gates, which were added eight years after the park was opened. Council minutes in Coventry make clear that renewing the housing stock was the more urgent call on funds, and the days of generous government loans for parks had passed. In most cases, the opening of the park was followed by several years during which further amenities and features were added as funds allowed.

While Willenhall Memorial Park on the edge of Walsall was formally opened in 1923, it was incomplete: the bandstand was built in 1927, and a pavilion, shelter, clock and aviary were added in the 1930s.

A memorial park often grew from a pre-existing aspiration for a public park. In Romsey in Hampshire, a park had been discussed for many years before the First World War, and the end of the War gave the campaign fresh impetus under the banner of commemoration. What was laid out was a traditional public park of some 2ha. complete with bandstand and ornamental planting (Fig10). Negotiations to purchase the estate which became Gheluvelt Park were opened as early as 1912, while the Memorial Park at Herne Bay in Kent was created on a site where a park had first been proposed in 1894. In other cases, as at Kirkham, a pre-existing park was adopted as a memorial. At Chingford in Essex, the Memorial Park was laid out in 1930 around the pre-existing war memorial garden. The site was extended to some 3.8ha. and became the Urban District Council's first municipal park, with a range of amenities including a bandstand and ornamental pond as well as sports pitches and a bowling green.



**Figure 9**  
The Memorial Park at Kirkham, Lancashire, on which Thomas Mawson advised. This has a strong formal design with an axial walk aligned on the church spire.



**Figure 10**  
An early view of Romsey Memorial Park (Hampshire), opened in 1920; the Grade II-listed war memorial was unveiled in 1921. As the principal park in the town it contained most of the amenities associated with a typical public park.



Among common features, commemorative gateways are perhaps the most notable (Fig 11). Materials are generally local but brick and wrought iron or mild steel are more widespread than might have been the case amongst earlier public parks. The grade II-listed gates at Ashbourne Memorial Park are in finely carved red Hollington stone (Fig12) while the imposing gates to Fleetwood Memorial Park are a theatrical composition using rendered masonry and timber (Fig13). Fine examples of memorial gateways include those Gheluvelt Park, Herne Bay (Kent), Heanor War Memorial Park (Derbyshire) and Pelton Fell War Memorial Park in Chester-le-Street (County Durham).

The design of many sets of gates included dedicatory plaques attached to the gate piers, which in some cases also include a roll of honour. At Fleetwood there were bronze bas-reliefs of a soldier and a sailor, one of which was subsequently stolen. At Pelton Fell, wrought iron wreaths were worked into the gate design matching those on the war memorial in the park. In many instances, the name of the park and its memorial function is prominently displayed, either as part of the ornamental metalwork of the gates or in carved stone.

Some war memorial parks, such as Coventry or Fleetwood, contain an imposing sculptural or architectural monument as a focal point. Elsewhere, a monument may be contained in its own discrete enclosure of paving, dwarf walls, or planting, either hedges or flower beds. However, many memorial parks do not contain a monument, the open space and its recreational facilities themselves serving as the memorial.

Memorial parks were often chosen as the location for one of the 264 'war-battered' tanks (sometimes accompanied by captured field guns), presented at the end of the First World War to towns around the UK in recognition of efforts in selling war bonds. All but one, at Ashford in Kent (listed Grade II), were later removed, many as part of the drive for scrap iron during the Second World War. In Ashbourne the presentation of a German gun for the new park was ambushed by indignant veterans, who hauled it away and dumped it in a lake.



**Figures 11 (top), 12 (middle), 13 (bottom)**

Top: Dawley Memorial Park (Telford & Wrekin), opened in 1902 to mark the coronation of Edward VII and rededicated as a memorial park after the First World War. A prominent display of the commemorative function is characteristic of memorial park entrances. Middle: View of the Grade II-listed gates at Ashbourne Memorial Park, Derbyshire, which was opened in 1922. © David Hallam-Jones

Bottom: The entrance to Fleetwood Memorial Park (Lancashire), a theatrical construction of rendered masonry and timber, originally incorporating brass bas-reliefs in its ironwork. Here an existing park was redeveloped in 1925 by the noted town planner Sir Leslie Patrick Abercrombie (1879-1957) into a memorial to those who fell in the First World War.



## 1.6 Memorial avenues and trees

Avenues were widely considered as memorials after both World Wars. *Roads of Remembrance as War Memorials*, a pamphlet published in 1920, advocated the planting of trees along existing highways, as well as the construction of new roads as memorials. At East Keswick (West Yorkshire) in the early 1920s, a row of seventeen lime trees was planted leading from the war memorial cross along the road leading out of the village, each with a plaque commemorating one of the parish's dead. In Croydon, in south London, the Promenade de Verdun was laid out in 1923 on the Webb Estate to commemorate French sacrifices on the Western Front. It extends a third of a mile, and ten tons of French battlefield soil was imported to plant a line of Lombardy Poplars. At the south-east end is a tall obelisk, dedicated to the French soldiers who died in Petain's stand against the Germans in 1916.

Avenues also feature within a number of war memorial parks. At Herne Bay in Kent, an Avenue of Remembrance planted with horse chestnuts, recently diagnosed with bleeding canker, leads from the entrance (to which ornamental gates were added by the British Legion in 1932) to the central war memorial. Fleetwood Memorial Park is designed around a series of axial walks focused on the central memorial and includes an avenue dedicated to the Fallen of the First World War. An avenue of lime trees was planted from the Dartmouth Avenue entrance at Willenhall War Memorial Park (West Midlands) in the early 1930s. An avenue leads to the war memorial in Heanor Memorial Park (Derbyshire), laid out after the Second World War (Fig14). At Wickford Memorial Park, near Basildon (Essex), also laid out after 1945, the park was planted unusually with two rows, an inner row comprising smaller flowering trees.

Memorial trees were also planted singly or in informal groups in a number of parks. At Coventry some 249 trees were planted individually along the paths as memorials to the dead of the First World War, but the tradition has continued and there are now approximately 800 memorial



**Figure 14**

The avenue at Heanor Memorial Park, Derbyshire, opened in 1951. Conceived in 1945, the park included a new war memorial but was primarily so 'all people, young and old, could enjoy the beauties of nature in lovely surroundings'. Facilities included tennis courts and a children's playground.

© Paul Brentnall

trees not only to service dead but to civilians. Take-up in the 1920s may have been slow, as from the outset the Council charged for both tree and plaque; in 1923 the charge was 25 shillings (over £300 in today's prices). Chobham Recreation Ground in Surrey, purchased as a war memorial after the First World War, was subsequently planted with thirty-two chestnuts, one for each man who died in the Second World War, commemorated on a bronze plaque on the gate piers. The war memorial at Downham in Essex took the form of a nurses' home and also a planting of 27 oak trees for the 26 dead from three villages, the first tree being planted beside a memorial tablet with the full roll of honour.

Tree-planting was often ritualised as part of a local commemoration. At Fleetwood, the memorial avenue trees, one for each of the Fallen, were planted by the servicemen's children; similarly, at Downham, the individual oak trees were each planted by the next of kin with a name plate attached by a length of telephone cable cut from a reel brought back from France.

Name plaques were attached to memorial trees at many sites, whether planted in an avenue



or singly. Good examples survive at the War Memorial Parks in Coventry and the avenue at Wickford (at both, the plaques are of metal and mounted on low concrete plinths), but in most cases they have been removed or lost. Memorial trees, and in particular the use and disappearance of name plaques either attached or adjacent to trees, is a subject which deserves further research. As with war memorials and memorial parks in general, the deliberations of war memorial committees, most of whose proceedings survive in local record offices, are a rich source of detailed information which, apart from commendable examples of local history research, has scarcely been tapped.

## 1.7 Sports facilities

The other common characteristic of memorial parks is the provision made for sport, play and formal recreation. Facilities were provided for both veterans and the younger generation, and included bowling greens, tennis courts, football and cricket pitches, and playgrounds. Many memorial parks are now regarded or even renamed 'recreation grounds' in recognition of this dominant characteristic. In most parks over a certain size, a large proportion of the site was, and often still is, dedicated to such use. Sports pavilions often have a memorial function: at Padiham Memorial Park, which had been opened in 1921, the Second World War memorial was a new pavilion and sports club, with 54 individually dedicated seats around the cricket pitch, although these were in poor condition by the mid 1980s and subsequently removed. A memorial plaque on the pavilion reads: '1939-1945 / In memoriam / Ye that live on / Mid English pastures green / Remember us & think / What might have been'.

The strong emphasis on sport can be seen in numerous examples. Forster Memorial Park in the London Borough of Lewisham, donated by the local MP in memory of his two sons killed in the First World War, is a 17ha. site largely devoted to playing fields, although with some notable ancient woodland around its perimeter. North Walsham Park (Norfolk) is a 4.5ha site largely laid

out for playing fields with a hedged enclosure around the war memorial. Oatlands War Memorial Playing Fields in Surrey (now Oatlands Recreation Ground), was laid out in 1919, alongside the War Memorial Allotments. The Mobbs Memorial, commemorating Edgar Mobbs, DSO, who played rugby for Northampton and England, in Northampton's Garden of Remembrance in Abington Square, features panels depicting both the battlefield and the rugby pitch.

## 1.8 Landscapes of remembrance

Although provision for formal sport and active recreation was the dominant feature in most war memorial parks, other kinds of terrain were also sometimes acquired as memorials. In 1921 Sir Thomas Rowbotham, former Mayor of Stockport (Greater Manchester), presented some thirty-six hectares to the town in memory of its war dead to form Woodbank Memorial Park. The 1949 town guide said the park was 'beautifully wooded and, skirted by the river Goyt, presents striking natural views. The bluebells in the woods are a feature almost unequalled in any public park in the country.'

At Radcliffe-on-Trent in Nottinghamshire a local landowner, Lisle Rockley, purchased some nine hectares to create a memorial to the men of the village and to his son. The land comprised chiefly 'a stretch of the cliffs a mile long, covered with trees and tangled undergrowth. Vistas have been cut through, waterfalls constructed by tapping hidden springs, dell walks made down to the river, and a grass promenade 36 ft. wide laid out along the top of the cliffs, with two small parks abutting. More than 10,000 ornamental shrubs, flowering trees and evergreens have been planted.'

'Natural landscapes' – places of beauty and contemplation – were also given *in memoriam*. In the Lake District the Fell and Rock Climbing Club donated 3,000 acres of land including Great Gable to the National Trust in memory of club members who had died in the war; Scafell, and Piel Island were similarly gifted. The War Memorials Archive records a further fourteen



examples of land donations as war memorials, mostly in the Home Counties, although these form a far from complete inventory.

## 1.9 Memorial parks and urban planning

In a limited number of instances, memorial parks were developed as part of a piece of large-scale of town-planning. At Fleetwood in Lancashire), a 7ha. site was laid out to designs by Sir Patrick Abercrombie in 1925-6 on the former grounds of Warrenhurst House as an integral part of a new residential development. Willenhall Memorial Park on Walsall's urban fringe was part of a bold new council housing scheme, aiming to create homes fit for heroes in a green setting. It was a Park and Garden City combining open space for informal recreation with areas of woodland, laid out on the site of former mine-workings. The work was overseen by a War Memorial and Town Development Committee, and Walsall was ahead of its time in seeing a park as a key part of good quality housing development. The land used for the Memorial Park at Wickford was acquired after the Second World War as part of a planned public housing development and earmarked for recreational purposes from an early stage. Early designs show a clear planned relationship between the housing and the park, with a central residential avenue leading to a community hall set on the edge of the park and tied into it with formal tree planting.

In a small-scale version of homes fit for heroes, some memorial parks were associated with cottage-housing designed for returning servicemen, often disabled. The 'City of Worcester Homes for Disabled Sailors and Soldiers' in Gheluvelt Park were integral to the park design from the outset (Fig15), while housing for elderly village residents was part of the plans for Pinner Memorial Park (London Borough of Harrow) created out of the West House estate. Thomas Mawson had championed the idea of housing for disabled veterans in *An Imperial Obligation* (1917), the book he produced after his son James was killed at Ypres. Mawson's model village included not only market gardens and allotments but

also a recreation ground with bowling green, tennis courts and clubhouse as well as a war memorial in a formal garden setting located in a central position in the village, and gardens for the hospital to include a bowling green and flowerbeds.

In some instances, a group of war memorials was enabled by generous fund-raising. In Ilford for example, the £10,000 raised by the memorial appeal after the First World War was used to purchase the site for the War Memorial Gardens, to erect a monument, to build a children's wing to the hospital and to build a memorial hall. The park thus has a group value associated with these other memorials as well as its own specific significance. To modern eyes, some of these juxtapositions can seem incongruous, but recognising the extent and diversity of memorial parks and gardens is essential to understanding the nature of commemoration.



**Figure 15**  
The City of Worcester Homes for Disabled Sailors and Soldiers were incorporated within the design of Gheluvelt Park from the outset.  
© P L Chadwick

## 2 Change and the Future

Memorial parks now face the same threats as all parks maintained by local authorities; central government policy has resulted in unprecedented cuts to non-statutory services such as grounds maintenance, and these cuts are set to continue for at least another three years, by which time maintenance budgets will have been cut by 60-90 per cent from 2010 levels. Like all parks and like many other war memorials, their features are vulnerable to vandalism and metal-theft. In

addition, many memorial parks, while highly significant in terms of their intangible heritage of civic commemoration and personal histories, were not only physically modest designs, but were often spaces dominated by formal recreational provision. Combined with their all being relatively recent in origin, this has meant that their historic landscape interest has been undervalued at a national level and is only now being addressed.



# 3 Further Reading

Very little has been published on war memorial parks and gardens, and they feature little in surveys of architectural and sculptural memorials, such as Alan Borg's *War Memorials from Antiquity to the Present* (1991), Derek Boorman's *At the Going Down of the Sun* (1988) or the more easily accessible publication *War Memorials in Britain* by Jim Corke (2005). Boorman shows an appreciation for a well-tended garden, but generally memorial parks and gardens are viewed as little more than the setting for the monument.

In (2014), the Garden History Society published a special edition of *Garden History* (42: supplement 1) commemorating the First World War, which includes 'A Living Monument': Memorial Parks of the First and Second World Wars' by David Lambert. Kristine F Miller's *Almost Home: The Public Landscapes of Gertrude Jekyll*, University of Virginia Press, 2013, includes a chapter on Jekyll's designs for the Commonwealth War Graves Commission cemeteries.

The best general account of war memorialisation is given in Alex King's *Memorials of the Great War in Britain: The Symbolism and Politics of Remembrance* (1998). Hazel Conway's 'Everyday Landscapes: Public Parks from 1930 to 2000', *Garden History* 28:1 (2000), gives a useful summary of the shifting priorities in park design.

The UK War Memorials Database (<http://www.ukniwm.org.uk/>) administered by the Imperial War Museum has entries for over two hundred war memorial parks and gardens, which comprise a proforma with basic survey information and, where known, references to archival and photographic material. The North East War Memorials Project has a similarly impressive depth of local research (<http://www.newmp.org.uk>).

The War Memorials Trust, which promotes the protection and repair of all forms of war memorial, co-published with English Heritage, the Garden History Society and Historic Scotland *Conservation and Management of War Memorial Landscapes* (2012), which provides guidance on the treatment of landscape in war memorial conservation projects.

More has been written on memorial tree-planting. In the late 1990s, Paul Gough published a useful series of papers relating primarily to memorial landscapes on battlefield sites, such as 'The Sacred Turf: War Memorial Gardens as Theatres of War (and Peace)' in English Heritage, *Monuments and the Millennium* (2001), 228-36, and 'Conifers and Commemoration – the Politics and Protocol of Planting,' in *Landscape Research*, vol.21, no.1 (1996), 73-87.

A number of parks have been investigated by county gardens trusts, details of which are continuously uploaded to the database of Parks and Gardens UK (<http://www.parksandgardens.org>); a short but useful article on First World War memorial parks in Sussex was included in the 2014 *Yearbook* of the Association of Gardens Trusts. A good deal of information on individual memorial parks is included on the London Historic Parks and Gardens Trust database (<http://www.londongardensonline.org.uk>).

Some of the best historical material has been published by local historians online, where detailed accounts of some memorial parks and gardens can be found by a simple name search; for example the Fampoux Gardens in Bournemouth at <http://www.wintonforum.co.uk/fampoux.html>; Easingwold Memorial Park at [http://www.easingwold.gov.uk/park\\_history.htm](http://www.easingwold.gov.uk/park_history.htm); or Earby Memorial Park at [http://www.pendle.gov.uk/info/200032/deaths\\_funerals\\_and\\_cremations/94/bereavement\\_services/14](http://www.pendle.gov.uk/info/200032/deaths_funerals_and_cremations/94/bereavement_services/14). Also, a number of local authorities or Friends groups have uploaded the conservation management plan for a specific park, for example that for Herne Bay Memorial Park can be found at <https://www.canterbury.gov.uk/leisure-countryside/things-to-do-in-the-district/parks-and-gardens/memorial-park>

Many more narratives remain to be recovered, especially from local newspapers. Increasingly these are available online via the British Newspaper Archive (<http://www.britishnewspaperarchive.co.uk/>).

# Acknowledgements

**Author**

David Lambert, The Parks Agency

**Contributors**

Colin Burden, Frances Casey, Ces Edwards, Mark Fenton, Nancy Fulford, Maggie Goodall, Emily Parker, Gary Peacock, Janet Waymark, Jenifer White, Reno Whitehead.

**Editor**

Paul Stamper

**Design and layout**

Vincent Griffin

**Images**

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## Contact Historic England

### East Midlands

2nd Floor, Windsor House  
Cliftonville  
Northampton NN1 5BE  
Tel: 01604 735460  
Email: [eastmidlands@HistoricEngland.org.uk](mailto:eastmidlands@HistoricEngland.org.uk)

### East of England

Brooklands  
24 Brooklands Avenue  
Cambridge CB2 8BU  
Tel: 01223 582749  
Email: [eastofengland@HistoricEngland.org.uk](mailto:eastofengland@HistoricEngland.org.uk)

### Fort Cumberland

Fort Cumberland Road  
Eastney  
Portsmouth PO4 9LD  
Tel: 023 9285 6704  
Email: [fort.cumberland@HistoricEngland.org.uk](mailto:fort.cumberland@HistoricEngland.org.uk)

### London

1 Waterhouse Square  
138-142 Holborn  
London EC1N 2ST  
Tel: 020 7973 3700  
Email: [london@HistoricEngland.org.uk](mailto:london@HistoricEngland.org.uk)

### North East

Bessie Surtees House  
41-44 Sandhill  
Newcastle Upon Tyne  
NE1 3JF  
Tel: 0191 269 1255  
Email: [northeast@HistoricEngland.org.uk](mailto:northeast@HistoricEngland.org.uk)

### North West

3rd Floor, Canada House  
3 Chepstow Street  
Manchester M1 5FW  
Tel: 0161 242 1406  
Email: [northwest@HistoricEngland.org.uk](mailto:northwest@HistoricEngland.org.uk)

### South East

Eastgate Court  
195-205 High Street  
Guildford GU1 3EH  
Tel: 01483 252020  
Email: [southeast@HistoricEngland.org.uk](mailto:southeast@HistoricEngland.org.uk)

### South West

29 Queen Square  
Bristol BS1 4ND  
Tel: 0117 975 1308  
Email: [southwest@HistoricEngland.org.uk](mailto:southwest@HistoricEngland.org.uk)

### Swindon

The Engine House  
Fire Fly Avenue  
Swindon SN2 2EH  
Tel: 01793 445050  
Email: [swindon@HistoricEngland.org.uk](mailto:swindon@HistoricEngland.org.uk)

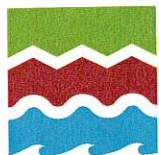
### West Midlands

The Axis  
10 Holliday Street  
Birmingham B1 1TG  
Tel: 0121 625 6870  
Email: [westmidlands@HistoricEngland.org.uk](mailto:westmidlands@HistoricEngland.org.uk)

### Yorkshire

37 Tanner Row  
York YO1 6WP  
Tel: 01904 601948  
Email: [yorkshire@HistoricEngland.org.uk](mailto:yorkshire@HistoricEngland.org.uk)





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## Submission Plan Change 13 and Plan Change 14

Christchurch City Council needs to take responsibility and ensure the built environment is designed to be a thing of beauty instead of creating future slums and a concrete jungle. Stop with the fugly crowded concrete look. Aesthetics are key to people's mental health and well-being. People need space and not rows and rows of three storey rabbit hutches crowded all together on sections that used to house a single dwelling. Green space at the back and front of properties. Mature trees need to be retained and not clear felled.

It is not fair that existing residents living in existing one storey dwellings can end up with three storey, three wide rabbit hutches built next to them. Existing residents need to be notified and consulted. They are the ones who will very shortly be suffering from lack of privacy, lack of sunlight, lack of infrastructure, stormwater and drainage. Please don't blanket swathe all of Christchurch with medium and high-density housing.

People need room for vegetable gardens and fruit trees, so they don't need to pay extortionate supermarket prices.

Pocket parks, community gardens and more and bigger parks need to be created. There need to be more community spaces including the rebuild of the Shirley Community Centre.

If the council allows infilling with concrete where does the water run? That is right over roads, into gardens and into houses. Areas that are in the flood zone should not have infill housing built. The flooding during heavy rain incidents will only get worse. What part of this area is prone to flooding do you not get?

New buildings need to be designed to fit in better with the existing built environment. More character and heritage areas need to be created and protected. In particular Woodville Street in St Albans. It is one of the few streets left in St Albans Edgware that has not been totally decimated by infilling by developers in pursuit of filthy lucre who don't care about the residents of streets who are left to deal with the fall out of felled mature trees, concreted sections with nowhere for the water runoff to go and crowded on street parking. Most of the original houses, many of whom were built in 1910 and are therefore 113 years old, are still standing. Houses that had to be rebuilt following the earthquakes have mostly been built in the original style. Many houses have been repaired following the earthquakes.

How can you retain precious heritage/character streetscapes if you let developers pull them down? Save them before they are gone. What is wrong with people wanting to live in renovated character properties. Some of us don't want to live in a squat, mushroom houses. We like soaring 3 metre stud ceilings. Stop trying to take away our choices.

The residential red zone (Otakaro River Avon Corridor) needs to become a qualifying matter. Allowing future housing to be built in these areas makes a mockery of the people forced to leave their properties because they thought they didn't have any choice. No one suggested they could have off the grid electricity and sewage systems. They did not receive enough money to purchase a property of equal value or even a replacement property. Red zone residential (ORAC) should stay red zone, never to be built on again. A memorial to the previous owners who were coerced into leaving their properties, not somewhere to be rebuilt with housing and sold at huge profits. The land is unstable during earthquakes, and we need to learn not to repeat the same mistakes going forward.



Replacing this:































With this:





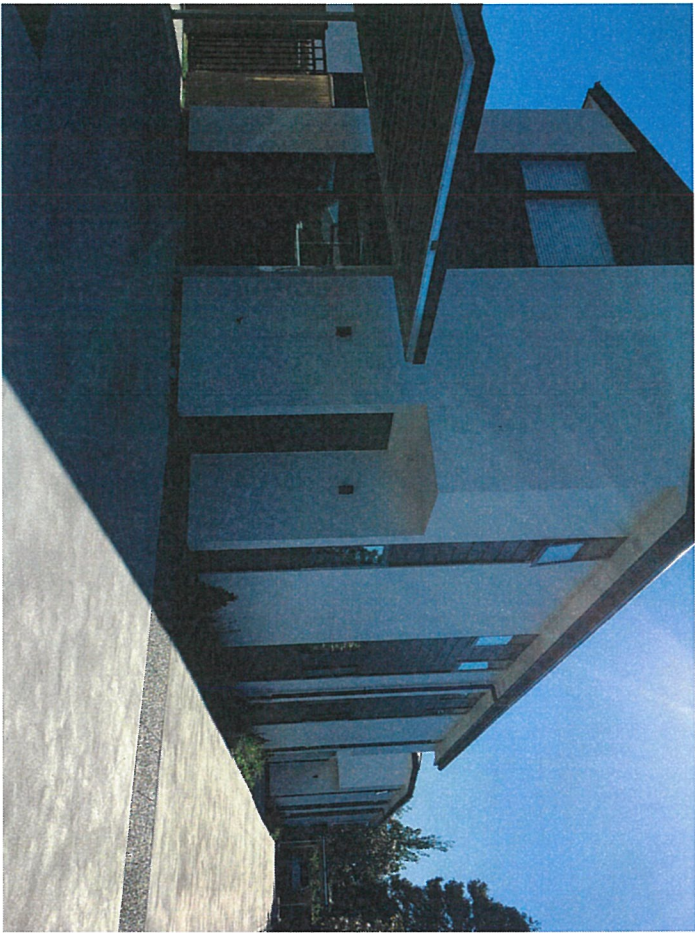




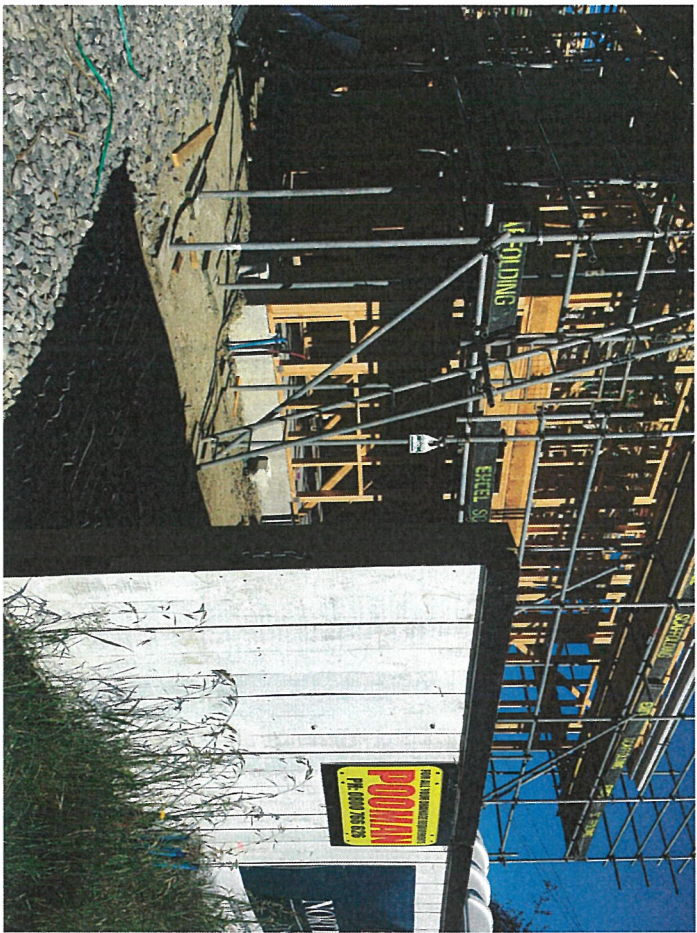








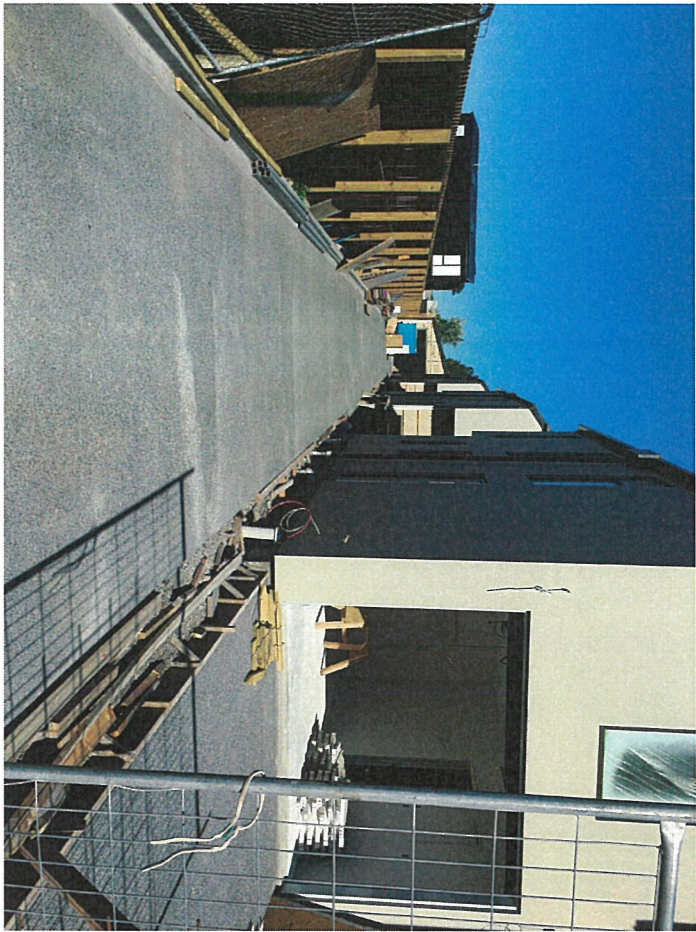
















# Is not the answer:

## What about?

- Sunlight and privacy
- Residents' mental health
- The environment and climate change – we need a tree canopy and bird life in our cities not a concrete jungle and landfill
- The effects on existing local infrastructure/amenities
- Respect for and retention of our built heritage and streetscapes



A short term fix is not the answer. Consult and work with local communities to get it right first time.







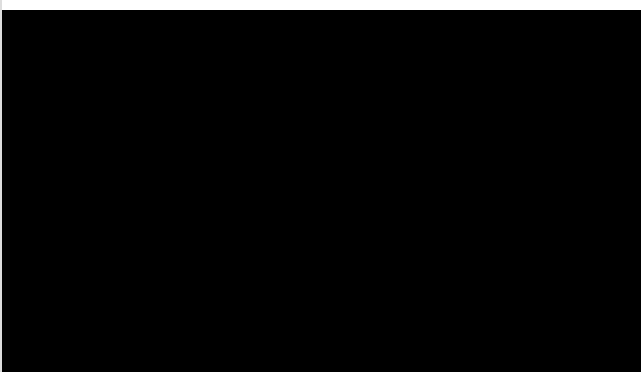
# Our proposed Housing and Business Choice and Heritage Plan Changes (13 & 14)

## Submitter Details

**Submission Date:** 16/05/2023

**First name:** Margaret **Last name:** Stewart

**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.

## Attached Documents

File
M_Stewart_1
M_Stewart

## Submission Plan Change 13 and Plan Change 14

Christchurch City Council needs to take responsibility and ensure the built environment is designed to be a thing of beauty instead of creating future slums and a concrete jungle. Stop with the fugly crowded concrete look. Aesthetics are key to people's mental health and well-being. People need space and not rows and rows of three storey rabbit hutches crowded all together on sections that used to house a single dwelling. Green space at the back and front of properties. Mature trees need to be retained and not clear felled.

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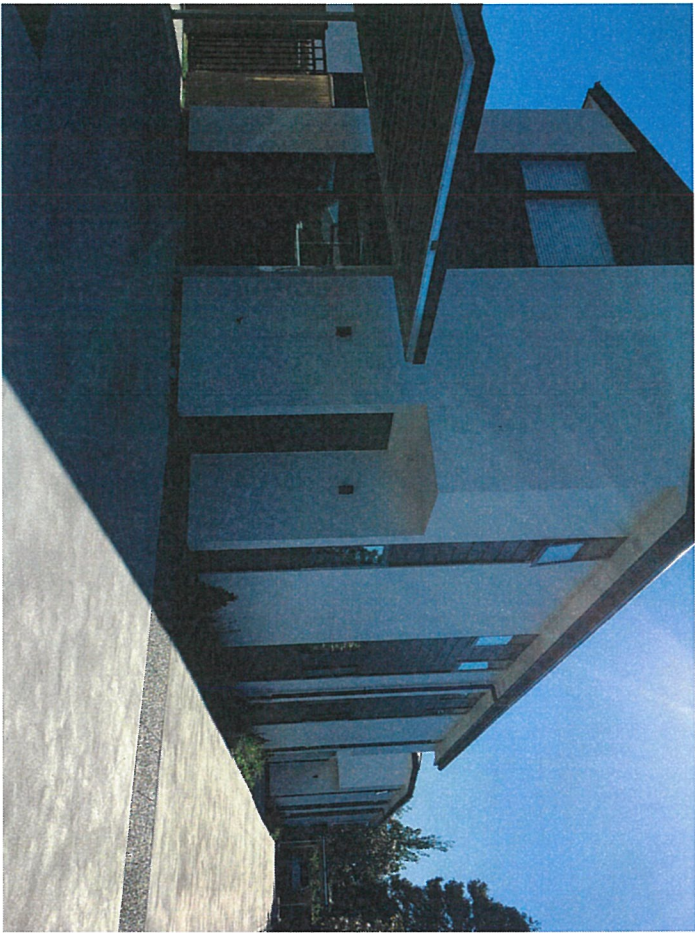




























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- Respect for and retention of our built heritage and streetscapes



A short term fix is not the answer. Consult and work with local communities to get it right first time.





Mulder, Andrea

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From: McNeil, David  
Sent: Friday, 12 May 2023 2:49 pm  
To: Engagement  
Cc: [REDACTED]  
Subject: Feedback on Our proposed Housing and Business Choice Plan Change (PC14) / 531  
Attachments: Plan change submission.pdf

Hi team,

Please see attached submission from Margaret Stewart from [REDACTED] covering both PC 13 and PC 14 😊

[REDACTED]

Please respond via email that you have received this email and Margaret would also like to present herself in the hearing meeting. Her view is to make amendment to the proposal.

Kind regards,

**David McNeil**

**Customer Services Representative**  
Customer Services Team (TAKAHE)



03 941 8999



David.McNeil@ccc.govt.nz



Te Hononga Civic Offices, 53 Hereford Street, Christchurch



PO Box 73012, Christchurch 8154



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City Council 