

BRIEF STATEMENT OF ISSUES Re Plan Change 13-14 (Harding)

- My first PC-13 document [Submission 1079] was created on the advice of the citizen advisory officer, Ms Jane West, after I saw a leaflet in the former South Library. I pursued no particular argument but was concerned at the removal of the SaM17/17A heritage plan regime adopted after the 1995 City Plan revisions. I was very well aware that the SAM (Special Amenity Area) regime had long gone, but I was then unaware of what a new document of Dr Ann McEwan (7 November 2023) called a “proposed Cashmere Residential Character Area” (=Residential Heritage Area) with a Proposed Appendix 9.3.7.9.8 to the District Plan. Communication with hill residents (let alone Macmillan Avenue ones, as an eminently workable sub-set) on these changes has been effectively zero. This is a seriously flawed consultation, made worse by the fact that no Cashmere Residents’ Association currently exists to help disseminate such proposals. (The CRA went into voluntary recess about 5 years ago). The Waihora-Spreydon-Cashmere Community Board, as submitted by Chair Callum Ward (12 May 2023), supported the enhanced Residential Heritage Area status (RHA) to a small Sydenham block and to the eastern end of Macmillan Avenue without ever mail-dropping all residents of Macmillan Avenue to advise them of this new layer of tighter heritage control under the RMA 1991. This is a community which nearly lost the open space amenity of the Cashmere Village Green in 1995-96, and so the lack of engagement with citizens and high ratepayers in this important change was, to say the least, egregious and unfortunate.
- The 1995-96 CCC process of updating the City (now District) Plan was managed by Mr Bob Nixon (CCC planner); and people, such as me, appeared before a Council subcommittee to argue for preferred boundary delimitations. The Cashmere Residents’ Association had been reactivated by a group of Cashmere residents for that City Plan review, including past CCC staff Brian Bluck and Bruce Alexander. A concern then strongly researched and promulgated by the elected CRA committee was the “protection of views” from Cashmere to the plains and Alps.



Southern Alps from Macmillan Avenue, May 2025

- Here Messrs Bluck and Alexander deployed their specialist skills in engineering, planning and surveying to create robust planning controls on new builds or renovated properties, including set-back rules to preserve streetscape integrity. I see no clear evidence of such matters/policy strictures surviving into the new regime being traversed under PC 13 & 14 but they may exist (Windows cannot open some of your big CCC files).
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- In 1996 I provided a document and addressed various City Councillors (e.g. Margaret Murray and Newton Dodge) about the territorial scope of what became SAM 17/17A, being concerned to ensure that The Village Green was inscribed in that SaM area. That concept was dropped in PC13-14, presumably because the park was later given protection under the Reserves Act 1977 and is not open to residential subdivision as a public recreational space.
- The new “Character Area” designation later replaced the SAM and kept a Resource Management Act 1991 (s.6 (f)) overlay. The latest Plan Change proposals (Residential Character Area 3 and Heritage Area 8) appeared to

remove large tracts of character streetscape in the central Cashmere zone that was focused/centred on the Cashmere Village Green at the junction of Dyers Pass Road and Macmillan Avenue, except in the delimitations of John Macmillan Brown's 1908 subdivision of land in eastern Macmillan Avenue. This may have meant that houses of merit and historical value like the Tommy Taylor house in Dyers Pass Road adjacent to The Village Green are excluded from RHA 8. I now find, to my relief, that they are encapsulated under the Character Area overlay.

- My key issue with Dr McEwan's architectural assessment of the newly drawn Macmillan Avenue character zone is that it fits within a Procrustean bed-style zone bluntly shaped around John Macmillan Brown's 1908 subdivision of former farmland first owned in fee simple by the suburb's founder, the retired British Army man John Cracroft Wilson. This means that the RHA starts at the eastern beginning of "Macmillan Road" (as it was first known) and stops where Whisby Road cuts down into the middle of Macmillan Avenue. It does a dog-leg uphill to the old houses at the Dyers Pass-Whisby interface and so it manages to incorporate JMB's 1899 [Category 1] Hurst Seager cottage (owned for years after the Browns by the Kennetts and Sue Kennett O'Brien, and which has been, since 2000, property of the Alpers family) which technically has an address at 2 Whisby Road. As I write, another character house at the Whisby Road-Macmillan interface is being massively altered (=it has a 19 Macmillan Avenue street address), and it seems that the new plans will likely echo a voluntary character designation such as parts of Auckland enjoy (Herne Bay, Point Chevalier and St Heliers). We have the paradox of the stylish new home (Cymon Allfrey-designed) and built right smack within the 1908 protected sector. It is elegant and set well back up a drive, and so does not look at all ill-assorted with the surrounding traditional character homes. It would be deemed "neutral" under the RHA.
- I do not wish to propose any individual regime of tight architectural control under a wider RHA ambit for any individual houses within the western end-block of Macmillan Avenue, but I cannot assess the value of a "proposed Cashmere Residential Character Area" to maintain some broad conformity of style with the dominant number of older traditional homes in that zone. The planning map used at the Hearing supports my argument that the the majority of the houses in the western sector are characterful and many are "defining" or "contributory". There is a 1964 classic Miles Warren-Maurice Mahoney home at 25, a modernist one (1959) at 24, a cheap box at 20 (hidden by a tasteful fence), an acceptable Art Deco one at 27, a tasteful Chris Prebble mock villa (38) but well below street level, a hidden monstrosity at 37 (currently being remodelled), and a modern box

at 39A. I have walked the unprotected zone (=Whisby to the west end of Macmillan) and my tally is: 15 character, 9 technically 'non-character'— out of a total of 24 houses. Thus the bulk of the west end of the street comprises older villas and formal two-storey houses. Premier among these is the Henshaw property at 35 Macmillan ("Holmebank 2")—designed in 1914 by Samuel Hurst Seager for Professor John and Helen Macmillan Brown and which commands a c.2 acre eyrie above a new rock retaining wall. These are all subject to the Character designation and I only learned this at this Hearing. None of the earlier CCC communications advised residents of this binary (two-tier) classification regime.

- My core issue is that an advisory-notificatory CCC flier should *ideally* have gone out (on the recommendation of our Councillor Tim Scandrett) to all Macmillan Avenue mailboxes in 2023, advising of this proposed PC13-14 regime and advising people of the 1908 subdivision delimitation for their street. This was a seriously flawed consultation which can be easily be remedied by a report on the final state of play once the Commissioners reach detailed decisions. I am confident that the Commissioners will concur that ratepayers in a very high rates-regime sector deserve to be informed, even if many do not care one way or the other.
- A final point: from 1995-2000 a highly controversial plan (Vicki Buck Mayoral era) to massively alter the visual amenity of the Cashmere Green led to potential divisiveness, energetic citizen activism and a keen majority desire (confirmed by a petition and later CCC submissions) to protect that small pocket park from any form of inappropriate development. The SAM 17 overlay held The Green conceptually within that zone. The new 1908 boundary for RHA 8 technically excludes it, as The Green is sited on "fee-simple public" (*dominium*) land and now zoned under the Reserves Act 1977, and it gained a Management Plan. Bruce Alexander discovered that it was initially road reserve land but was set aside for the citizens of Christchurch (as is the case with the Princess Margaret Hospital *land zone*). I shall argue, at this stage of the process, that the Cashmere Village Green be given extra formal protective recognition and visual amenity character overlay so as to preserve the positive *entente cordiale* which many people—including me—worked so hard, indeed strenuously, with two Commissioners (David Collins and Kim McCracken) and some superb CCC staff (Parks Unit especially) to achieve. It was a win-win outcome in 2000 which it would be good to embed in any District Plan revisions for heritage recognition. Although "The Green" is now not open to any subdivision risk, it is worth

reminding everyone that the City Council has an interest in the upper Green play area and the stone shelter, which CCC staff designed and built (at my suggestion), as the community shelter sits right at the edge of the new proposed Residential Heritage Area, being sited at the very start of Macmillan Avenue. Some careful note for file about augmenting *protection protocols*, in addition to the existing Reserves Act listing, would be very helpful, although I do recognize that this is work for the CCC Heritage Team and not for the PC13-14 Commissioners to oversee.

- I am very grateful to have been able to have minor input into this process and wish the Commissioners well in framing their judgments-recommendations on such a plethora of complex issues and remain,

Yours faithfully,

(Dr) Bruce Harding

20 June 2025