

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 21/04/2023

First name: Polly

Last name: Grainger

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Support

I seek the following decision from the Council

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

I seek that the Bewdley Street and Evesham Crescent (Barrington) be added to the Residential Character Areas list.

My submission is that:

I strongly support that Bewdley Street and Evesham Crescent (Barrington) to be included as one of the Residential Character Areas. We are fortunate in that all but one of our remaining homes are in their original style. There are three gaps where the houses have been ripped down but not yet built on. I would be really glad to retain our character and history.

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 01/05/2023

First name: Greg

Last name: Olive

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 16 Industrial

Seek Amendment

I seek the following decision from the Council

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

!. Our site is located across the road from the Southern portion of the Awatea Business Zone

(a) Maintain road setback rule 16.6.4.2.1

(b) Maintain Special interface Area IAW Appendix 16.8.10i as identified in the ODP plan.

(c) Noise rule 6.1.5.2.1 Table 1(m) currently states *50db between the hours of 2200-0700 if a dwelling existed prior to the plan change being operative*. With this being the case for our site then to avoid any confusion to the rule align the site rule with 6.1.5.2.1 Table 1(a)

My submission is that:

Our residential zoned site of approximately 2ha is located at 419 Halswell Junction Road. It contains an existing dwelling and numerous outbuildings. The site is bordered by Halswell Junction Road to the North, State Highway 76 to the West and Richmond Avenue to the South. A portion of the original parcel of land was taken for major roading infrastructure as part of the CMS2 project. This has resulted in the site being severely compromised and constrained with regard to level and degree of development that could realistically be achieved

Provision: Chapter 14 Residential

Seek Amendment


I seek the following decision from the Council

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

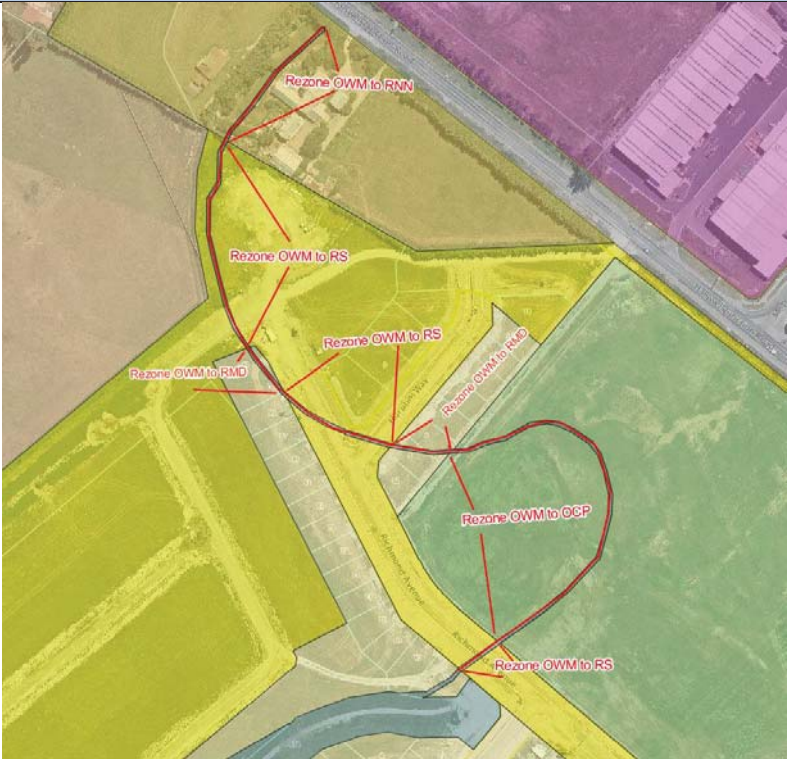

1. Qualifying Matter Open Space/ Water body. Our site has been identified with an open space water body as a qualifying matter. This was submitted on in 2017 and subsequently removed. Decision sought. Update the planning map and Council records to reflect this.
2. Qualifying Matter Industrial Interface. The dominant noise source is road noise. Due to the proximity of the Motorway infrastructure and the designations, virtually the entire site is contained within the current noise setback requirement IAW rule 6.1.5.2.1 (proposed change 5E). A very high degree of mitigation would be required to any residential units sited within the noise setback regardless of the height therefore effectively makes this provision redundant. Decision sought . Remove Qualifying Matter Industrial Interface
3. Site Density rule 8.2.2.87(a). Due to the constraints that have been imposed on our site as a result of the roading infrastructure, there has been an inability to produce a development proposal that meets the site density requirement for the current zone. Rule 8.2.2.87 indicates a more intensive level of development anticipated .than the site may possibly support. Decision sought. Apply an exemption to the site density rule
- 4.As an alternative to the MDRZ would would be to re-zone the site as mixed use. This would allow the establishment of structures to be located within the noise setback area and would act a buffer to the adjoining residential lots. This approach would be consistent with the objectives anticipated by policy 16.2.1.3 Item 1.

My submission is that:


Schedules to Decision

PLANNING MAP	CORRECTION	REASON THE CORRECTION IS MINOR
		
Planning Map 44	<p>a. Remove the Open Space Water and Margins (OWM) zoning from the area indicated with a red line below and replace with the surrounding/adjacent zoning i.e. Residential Suburban (RS), Residential Medium Density, Residential New Neighbourhood (RNN) and Open Space Community Park (OCP) as indicated.</p>	<p>During the hearing for Chapter 6 General Rules, Ms McLaughlin presented evidence² with regard to a request by Fulton Hogan and Mr Olive (the submitters) to remove a portion of the 'Upstream Waterway' classification from that part of Knights Stream between Richmond Ave and Halswell Junction Road. She supported the relief sought on the basis that there was no waterway in the area indicated, therefore the classification was unfounded. Such amendment was also consistent with the Outline Development Plan in Appendix 8.10.6, where Knights Stream is shown as stopping on the south side of Richmond Avenue.</p>

² CCC – Evidence of Alison McLaughlin – Planning, dated 4 February 2016, pages 93-94, paragraphs 57.6-57.7.

PLANNING MAP	CORRECTION	REASON THE CORRECTION IS MINOR
	<div><p>b. Remove the Open Space Water and Margins (OWM) zoning from the properties at 65 and 67 Richmond Avenue, as area outlined in red below, and replace with the Residential Medium Density (RMD) zone.</p></div>	<div><p>Regrettably, the OWM zoning applied to the same non-existent portion of the waterway was not requested to be removed at the same time. The discrepancy has only now been brought to the Council's attention. Therefore, a minor correction to Planning Map 44 is requested that will remove the OWM zoning and replace it with a zone consistent with the surrounding/adjacent zoning, i.e. RS, RMD, RNN and OCP as indicated on the map enlargement on the left. The zoning correction will reflect the actual situation on the ground and prevent the costs associated with unnecessary consenting. It is noted that the majority of the land is zoned for residential purposes and is in the process of being developed.</p></div>

Schedules to Decision

PLANNING MAP	CORRECTION	REASON THE CORRECTION IS MINOR
	 <p>c. Remove the blue line indicating an "Upstream Waterway" classification from the property at 67 Richmond Ave in the area outlined in red on the above map.</p>	<p>A closer scrutiny of the land/waterway in the area immediately south of the future extension of Richmond Avenue revealed that both the 'Upstream Waterway' classification and the OWM zoning should also be removed from the narrow portion of the OWM zone extending over residential properties at 65 and 67 Richmond Avenue (refer to the map in (b.) on the left). The OWM zoning should be replaced with RMD.</p> <p>The narrow "leg" of the waterway does not exist on the ground and the headwaters of the stream start within the adjacent wider part of the OWM zone. Any residual water seepage from the underground springs further north are directed to the stream through a pipe, under Richmond Avenue, which comes out directly into the wide portion of the OWM zone.</p> <p>The removal of the zoning and waterway classification is considered to be a minor correction which removes a defect in the Plan and simplifies the zoning and rules affecting the newly subdivided residential properties at 65 and 67 Richmond Avenue. The RMD zoning will reflect the intended use of the sites.</p> <p>The Council has contacted the affected property owners and provided the relevant information to them. The owners expressed their support for the proposed corrections by reply email or over the telephone.</p>
Planning Map 47	Amend zoning of 320A Cumnor Terrace (outlined in black below), including the small rectangle circled in red below, by removing Transport Zone and replacing with Industrial General Zone but retaining part Open Space Water and Margins Zone.	The entire property at 320A Cumnor Terrace was notified in Stage 1 as Industrial General Zone, and in Stage 2 as part Transport Zone and part Open Space Water and Margins Zone. The transport zoning was confirmed in Decision 12 Stage 2 Transport before confirmation of the Industrial General zoning in Decision 11 Minor Corrections to Decision and as to Planning Maps, Figures and Appendices. The Open Space

Our proposed Housing and Business Choice Plan Change (PC14) from Olive, Greg
 Our proposed Housing and Business Choice Plan Change
 (PC14)

Submitter Details

First name:

Greg

Last name:

Preferred method of contact

Olive

Email

Postal address:

Suburb:

City:

Country:

New Zealand

Postcode:

Email:

gre.olive2gmail.com

Daytime Phone:

Age:

Gender:

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 16 Industrial

Support

Oppose

Created by Consult24 Online Submissions Page 1 of 3Our proposed Housing and Business Choice Plan Change (PC14) from Olive, Greg

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

!. Our site is located across the road from the Southern portion of the Awatea Business Zone

(a) Maintain road setback rule 16.6.4.2.1

(b) Maintain Special interface Area IAW Appendix 16.8.10i as identified in the ODP plan.

(c) Noise rule 6.1.5.2.1 Table 1(m) currently states 50db between the hours of 2200-0700 if a dwelling existed

prior to the plan change being operative. With this being the case for our site then to avoid any confusion to the

rule align the site rule with 6.1.5.2.1 Table 1(a)

My submission is that

Our residential zoned site of approximately 2ha is located at 419 Halswell Junction Road. It contains an existing dwelling and

numerous outbuildings. The site is bordered by Halswell Junction Road to the North, State Highway 76 to the West and Richmond

Avenue to the South. A portion of the original parcel of land was taken for major roading infrastructure as part of the CMS2 project.

This has resulted in the site being severely compromised and constrained with regard to the level and degree of development that

could realistically be achieved

Chapter 14 Residential

Support

Oppose

Seek Amendment

Created by Consult24 Online Submissions Page 2 of 3 Our proposed Housing and Business Choice Plan Change (PC14) from Olive, Greg

I seek the following decision from the Council

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

1. Qualifying Matter Open Space/ Water body. Our site has been identified with an open space water body as a

qualifying matter. This was submitted on in 2017 and to our understanding it was subsequently removed at that time (attached details provided). Decision sought. Update

planning map 44 (D) and the Council records to reflect this.

2. Qualifying Matter Industrial Interface. The dominant noise source is road noise. Due to the proximity of the

Motorway infrastructure and the designations, virtually the entire site is contained within the current noise

setback requirement IAW rule 6.1.5.2.1 (proposed change 5E). A very high degree of mitigation would be

required to any residential units sited within the noise setback regardless of the height therefore effectively

makes this provision redundant. Decision sought . Remove Qualifying Matter Industrial Interface

3. Site Density rule 8.2.2.87(a). Due to the constraints that have been imposed on our site as a result of the

roading infrastructure, there has been an inability to produce a development proposal that meets the site density

requirement for the current zone. Rule 8.2.2.87 indicates a more intensive level of development anticipated .than

the site may possibly support. Decision sought. Apply an exemption to the site density rule

4.As an alternative to the MDRZ would be to re-zone the site as mixed use. This would allow the establishment of structures to be located within the noise setback area and would act a buffer to the adjoining

residential lots. This approach would be consistent with the objectives anticipated by policy

16.2.1.3 Item 1.

My submission is that

Attached Documents

File

No records to display.

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 30/04/2023

First name: Richard

Last name: Abey-Nesbit

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 1 Introduction

Support

I seek the following decision from the Council

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

My submission is that:

Intensification of the city is vitally important, and should not have been delayed by altering the qualifying matters. As that has already happened, I support the current proposed change with the understanding that we can amend the plan in the future to allow for further intensification. In the meantime, the changes seem sufficient to allow for large scale improvements for a decade or so.

Provision: Chapter 7 Transport

Support

I seek the following decision from the Council

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

My submission is that:

The council needs to invest more money into public transport, beyond what the proposed changes allow for. The council needs to move transport infrastructure in a direction that reduces (and eventually eliminates) forced car dependency. All people living in the urban and suburban environment should have the option to not depend on a private car for transport if they so choose.

Provision: Chapter 5 Natural Hazards

Seek Amendment

I seek the following decision from the Council

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

The council needs to accelerate planning for the managed retreat that will be necessitated by climate change. The council should make a commitment now that they will seek to not compensate land owners whose land is negatively impacted from readily foreseeable damage caused by climate change going forward. It should be made clear that anyone who seeks such protection should seek it from insurance companies.

My submission is that:

Climate change is a known quantity and leaving the possibility open of compensation for land owners whose holding will be damaged by climate change creates significant moral hazard, and creates danger to both property and the safety of residents of the city.

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 03/05/2023

First name: Dean

Last name: Christie

Organisation: Ngāi Tahu Property

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Support

I seek the following decision from the Council

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

My submission is that:

NTP support the Medium Density Residential Zone (MDRZ) or Stages 1 and 2 or Karamū, off Yaldhurst Road and Kahukura Road, because they have already been developed -14.5

Provision: Chapter 14 Residential

Support

I seek the following decision from the Council

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

My submission is that:

NTP support the inclusion of the current Residential New Neighborhood Zone provisions within the notified Future Urban Zone-14.12

Provision: Planning Maps

Oppose

I seek the following decision from the Council

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

Rezoning the site to be FUZ

My submission is that:

NTPs opposite the PC14 Planning Maps and decision sought. Please see the detailed submission attached.

Attached Documents

Name
Ngai Tahu Property_35 Steadman Road_Submission on PC14

1 May 2023

Christchurch City Council
Engagement Team
engagement@ccc.govt.nz

Our reference: 520384

Attention: Engagement Team

Submission on Proposed Housing and Business Choice Plan Change

Purpose of Submission

This letter is a submission on the Housing and Business Choice Plan Change ("PC14") proposed by the Christchurch City Council ("Council") prepared by Eliot Sinclair & Partners Limited ("ES") on behalf of Ngāi Tahu Property Limited ("NTP") in relation to 35 Steadman Road in Karamū, Christchurch ("site").

NTP will not gain an advantage in trade competition through this submission.

NTP will not be directly affected by an effect of the subject matter of the submission that:

- a. adversely affects the environment, and
- b. does not relate to the trade competition or the effects of trade competitions.

NTP wishes to be heard in support of this submission and would agree to consider presenting a joint case with other submitters who make a similar submission.

Submitters details

Submitter: Ngāi Tahu Property Limited

Contact Name: Dean Christie

Email: dean.christie@ngaitahu.iwi.nz

Phone: 021 226 0153

Physical Address: 15 Show Place, Addington, Christchurch 8024

Postal Address: PO Box 13-0060, City East, Christchurch 8141

Site location and context

The site is located at 35 Steadman Road in Karamū, Christchurch ("site") (refer to Figure 1). The site is legally described as Lot 2 Deposited Plan 541 604 as held within the Record of Title 910430 as held under the ownership of NTP with a land area of 17.0734ha.



Figure 1. Location of site within red boundaries (Canterbury Maps)

The site was subject to the Riccarton Racecourse Development Enabling Act 2016 ("RRDEA"). The RRDEA supported Christchurch's recovery following the 2010 and 2011 earthquakes by facilitating the residential development of certain land at Riccarton Racecourse, Christchurch.

As a pre-requisite under Section 9 of the RRDEA, NTP was required to prepare a Development Scheme for the development of the site detailing how NTP will meet the legislative targets of the RRDEA. The Development Scheme was prepared in consultation with Christchurch City Council and has been approved by the Government. As an outcome of this process, the land was released from its original Reserve status, to enable residential freehold development of the land. The Development Scheme and underlying contractual obligations with the Government continue to apply.

The Development Scheme confirms that a minimum of 180 affordable houses will be completed within Karamū (which includes the subject site). Failure to comply with this obligation will result in compensation payable by NTP to the Crown. The Development Scheme, the Compensation agreement, underlying RRDEA legislation and Christchurch District Plan RNN zoning post-earthquake, together form the basis for the development of the Karamū site and NTP's long term planning and development program.

Submission

This submission has been prepared by following the Council's notification of PC14 in response to the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 ("RMAA") and its Medium Density Residential Standards ("MDRS").

NTP support the inclusion of the current Residential New Neighbourhood Zone ("RNNZ") provisions within the notified Future Urban Zone ("FUZ"). Table 1 details NTPs opposition towards PC14 Planning Maps and decision sought. Further, NTP supports the Medium Density Residential Zone ("MDRZ") of Stages 1 and 2 of Karamū, off Yaldhurst Road and Kahukura Road, because they have already been developed.

Table 1. NTP Submission

Provision	Support / Oppose	Submission	Decision sought
MAPS			
Planning Map 30A and any other relevant Planning Maps which identifies the site.	Oppose	<p>The site is located within the Residential New Neighbourhood Zone ("RNNZ") under the Operative Christchurch District Plan ("Operative Plan"). Other undeveloped properties located within the RNNZ under the Operative Plan have been rezoned to FUZ under PC14. However, the site was rezoned MDRZ under PC14, rather than FUZ. Therefore, NTP oppose the MDRZ of the site.</p> <p>It is prudent to note that NTP undertake greenfield subdivisions and sell vacant allotments to be developed by the prospective purchaser. NTP do not generally build residential units.</p> <p>The inconsistent zoning approach towards the site significantly impacts the future development of this property and density. For example, the MDRZ requires a minimum allotment size of 400m², whereas the FUZ requires a minimum net site area of 400m² for corner sites, and for all other sites a minimum net site area of 300m² except that 20% of allotments in the subdivision may be 180m² -299m² in size. NTP have invested in the design and future layout</p>	Rezone the site to be FUZ.

for this part of the site which cannot be developed until such time as the lease with the current tenant expires.

Based on the notified zoning, the site would be developed into less residential allotments than that enabled by the current RNNZ and **FUZ**. Consequentially, the notified zoning of 35 Steadman does not foster increasing housing supply and, therefore, seems to be contrary to a key objective of the RMAA. Zoning the site **FUZ**, as similar properties were, would foster increasing housing supply which is intended by the RMAA.

For the reasons noted above, the MDRZ applied to the site, as notified by PC14, is contrary to the RRDEA and the Development Scheme. The Government approved the Development Scheme for the site and the RNNZ at the time. Christchurch City Council was also provided pre-approval of the Development Scheme ahead of Government consideration. Consequentially, the MDRZ applied to the site may result in NTP needing to compensate the Crown if a minimum of 180 affordable houses cannot be provided within Karamū. Additionally, when compared to the **FUZ** and its minimum allotment size standards, the MDRZ and its minimum allotment size standard do not best facilitate the expeditious residential development of the site.

Summary

NTP generally supports PC14 on the basis that the site is rezoned on the relevant planning map/s to FUZ, rather than MDRZ. In doing so, the site will remain consistent with the RRDEA and the Development Scheme.

Yours sincerely



Claire McKeever
Resource Management Planner
BSurv(Hons) MS+SNZ MNZPI
claire.mckeever@eliotsinclair.co.nz

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 21/04/2023

First name: Graham

Last name: Thompson

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Seek Amendment

I seek the following decision from the Council

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

The proposals must be reviewed to exempt similar cul-de-sacs and narrow accessways from all areas in the city for the sake of good neighborliness and safety and security.

My submission is that:

I live on a narrow extension of a cul-de-sac. Five homes face onto this access. Your map indicates that my area is medium density residential zone. There are at present no unused building sites but in the present circumstances there is always a possibility of a developer entering the area and activating the provisions of the medium density zone. The potential outcome of this would be 15 houses of three storeys. That could potentially mean the presence of 30 motor vehicles. On my narrow accessway parking for those would be inadequate so spill over onto the more open part of the street. Traffic and access and maneuverability would be at the least difficult and the likelihood of friction between residents is likely to be high. Furthermore, access for emergency vehicles could be impossible with the potential for loss of property or lives.

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 21/04/2023

First name: Mary-Anne

Last name: Thomson

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 8 Subdivision, Development and Earthworks

Oppose

I seek the following decision from the Council

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

Please vote no for 12m high buildings going up beside existing homes. Thank you


My submission is that:

I bought this property for the location due to my age and having neighbour's close by and am appalled that a 12m high building could be built next door. This would impede our sunlight, privacy and parking would be a nightmare! I absolutely disagree with this plan and feel for everyone this will effect in the future. It is obvious you are trying to get us all out of our cars - cannot see this ever happening so work around it! How you can give consents to these new townhouses with no garages or parking space is a crime for the City! Work for the people of the City, not yourselves and your pockets!!!!

Our proposed Housing and Business Choice Plan Change (14)

[Submitter Details](#)**Submission Date:** 22/04/2023**First name:** Colleen**Last name:** Borrie**Preferred method of contact** Email

Attached Documents

Name	
City development	

Plan Change 14

Is there an actual need for the proposed accommodation changes? As I observe the development of huge areas of new housing, especially to the west of the city, I wonder why it's also considered necessary to relax the rules allowing for the development of multi-storey residences in the city and suburbs. Where are the people who will live there? Will Christchurch's many young families and elderly want to live in such accommodation? With the noise from overhead neighbours? The difficulties of access for elderly people? The planned apartments may be suitable for couples or students, but they won't suit the average family. And if minimal or negligible garaging is provided on these properties, what about the provision of an effective transport system to serve these extra people?

The claim of greater sunlight access has to be a joke. While six storeys is hardly in sky-scraper league, it will certainly cast surrounding smaller buildings in shadow, resulting in higher winter heating and lighting costs for their unfortunate residents. To say nothing of the appearance of these new box-like structures. The terrain of a hilly city such as Auckland is able, albeit uncomfortably at times, to accommodate the wide variations in height where six storey apartment blocks are interspersed with smaller buildings. In Christchurch these will simply look like jagged teeth.

Christchurch has always had aspirations. In many respects it has punched above its weight. But why is it patterning itself on cities with an entirely different demographic? This is not a seat of government or commerce; fundamentally we are a provincial city built on earthquake-prone plains. To see this city as a centre of business and industry, in the mode of Sydney, or even Auckland, is to adopt the wrong vision. We are what we are, and we should embrace and enhance our own special character, and not attempt to copy other entirely different cities.

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details



Submission Date: 22/04/2023

First name: Cheryl

Last name: Horrell

Preferred method of contact Email

Attached Documents

Name	
Supporting CCC Documents	
Submission CCC Housing Development	

Supporting Documents – Cheryl Horrell



1. 6 Manning Place.



2. 5 Manning Place.



3. 38 Wildberry Street.



4. 54 & 56 Wildberry Street.



5. 79 Wildberry Street.

6. 100 Wildberry Street, No photo as yet.



7. 112 Wildberry Street.

8. 456 Ferry Road, no photo.



9. 6, 8, & 10 Hopkins Street



10. 15 Hopkins Street.



11. 18 Hopkins Street.



12. 22 Hopkins Street.



13. 24 Hopkins Street.

14. 5 Findlay Place, no photo.

15. 52 McKenzie Ave, no photo.



16. 84 Richardson Terrace.



17. McKenzie Ave Footbridge. Home for a growing family of rats.

Housing Development Proposals Create Flood Risk for Existing Home Owners: Who will pay when Disaster Strikes?

Politicians have been slow to learn from major flooding disasters in New Zealand. Despite the most recent example of Cyclone Gabrielle, local government continues to imagine we can confine river flows to suit minority interests and hide behind stop banks. Yet until Three Waters is enacted local government is all we have to protect us from rising sea levels, more frequent storms and flooding in our cities. I am grateful that Christchurch City Council is considering new and modified 'qualifying matters' which could prompt the need for resource consents for new housing in specific areas.

Current planning theory of building upwards, two to three storeys, with no need for consents is undermining suburban neighbourhoods like Woolston. There has been a proliferation of multi-unit building in our area being crammed onto sections that previously held one house with a small front yard and a back yard big enough for a vegetable garden. The Medium-Density Residential Standards (MDRS) might work in inner city areas where people presumably enjoy the noise and excitement of living on top of one another and in the midst of entertainment and business activities. It is important to note though that not only young, entertainment focused people live in or close to city centres, for many of us suburbs like Woolston are the only ones we could afford to buy in.

The theory of building upwards first emerged as a solution for urban sprawl around Auckland. Multi storey apartments on small sites were seen as preferable to encroaching further into the countryside. Building upwards enabled surrounding land to be shared for communal activities and socialisation. Such homes make sense on main bus routes where residents don't need cars to get around or to or from the city. Development happening in Woolston is not restricted to main bus routes though which is why the number of cars parked on our streets at night has increased dramatically. I urge Council to act before it is too late to stop multiple houses being crammed onto small sections in working class suburbs. If council genuinely believes in secure and equitable housing for all its citizens it must halt the insanity **of building future slums for the benefit of the building and rental industries and start protecting existing local residential communities.**

Future Slum Housing

I have owned and lived in multi storied units in Christchurch in the past, on Bunyan Street and on Hastings Street East and I felt compelled to move once homes around me went rental. Both those areas are now dominated by cheap rental housing leaving me relieved that I escaped when I did. I am not a fan of incorporating bulk rental units in residential areas populated by privately owned homes. In my experience renters do not generally share the same values or habits of private home owners who have invested life savings into their homes. Renters stay an average of two to three years in any one property whereas home owners tend to put down roots and connect with local communities. I once had a family of skinheads living next-door to me, in a brand new home. The owners had split up and they took their eye off the property long enough for the skinheads to trash the house. After that there was so much damage that the owners either didn't see the point or lacked the courage to terminate the tenancy. The skinheads stayed a long time and I moved out before they did. Not all home owner/tenant interactions are negative, I had one experience of living near a thoughtful couple with a school aged child renting a house close by but they were in the minority and eventually moved on to buy their own home.

I suspect that few builders or landlords of multi storied co-joined units have ever lived in such places themselves. Hearing neighbours using their toilets through shared walls and hearing sex through adjoining bedroom walls can be challenging. I am now too old to pack up a third time to escape an area becoming inundated with multiple units and I don't have the resources to avoid another area where unsatisfactory housing is being crammed onto tiny sections. When I was younger I was better able to adapt to living in difficult circumstances. My biggest fear now is being forced into a retirement village where I will be restricted to community contact with other old people who have lost control over their assets and lifestyle choices. I have contributed my share in life and deserve the opportunity to live a safe and inclusive retirement in the community I have lived in for the past 20 years.

Addington Example

Walking around Addington in the Selwyn Street area offers an example of what Woolston is destined to become if current building practices continue. Over half of the homes there are multi storey connected units with little or no enclosed outside private space. People sit outside in the cemetery or wander the streets because they cannot enjoy the outdoors at home. The signature shopping trolleys are abandoned around the neighbourhood, electric scooters block footpaths and the creek alongside the cemetery and park contains assorted rubbish; bottles, cans, packets and various paraphernalia among the grasses. I saw two separate elderly people walking the streets alone, both were surprised when I said hello. I don't want to end up isolated in a rental community like them. The shopping trolleys began to appear in Woolston in 2022, it is now common to see half a dozen daily on McKenzie Ave and the same number on Hopkins Street. Smith Street attracts even more. The electric scooters too are regularly left on our narrow footpaths for unsuspecting older residents to trip on. I have been walking the parks and rivers of Woolston, Waltham, Sydenham and Beckenham for over 30 years and am recently witnessing a huge increase in rubbish in and around the river and in parks.

Flooding Management

Council proposes to protect future homes from stormwater flooding in Woolston but nothing in Council's proposal will protect existing homes from increased stormwater run-off from multiple housing units being built on surrounding properties. You intend "To limit the quantity of stormwater from all new development sites *to pre-development levels*, and minimise stormwater increases from re-development sites through consent conditions." This proposal will purportedly "Protect houses from flooding during and after development by having controls on new floor levels. [And] continue to improve flood models and [your] knowledge of flood risks." I do not see however how the proposal will prevent flooding from encroaching onto streets and footpaths and overflowing existing drainage systems which have repeatedly proven to be inadequate over the past 10 years. Several single home sites are under development in Woolston at present and all but one (52 McKenzie Ave) are being replaced by four or five individual units. Your proposals to manage flooding by raising housing floor levels do not stand up to scrutiny; five new houses will undoubtedly contribute more stormwater pressure on existing systems than the original one home surrounded by permeable land.

Development taking place in Woolston in late 2022 and early 2023 contain multiple units, up to five homes per section (six in one Smith Street development) on land originally consented for one residential dwelling. These multiple units are surrounded by impermeable surfaces which are likely **to contribute to increased surface flooding which will not prevent new homes from being flooded, even on higher foundations**. Existing Smith Street residents have already experienced severe flooding which may not have entered homes but damaged vehicles, garages and everything else outside the homes. Flooding is flooding, residents are trapped in their homes unable to go to work or attend medical or other appointments. Council has a responsibility to try to prevent flooding not raise the floor levels of new homes and **abandon existing, long term residents to floodwaters**.

New regulations on three storied apartments with lots of shared permeable spaces to provide gardens and social areas have been corrupted in Woolston by fast, cheap building to make a quick buck from the lack of adequate protections. **Someone will have to pay for this business as usual botch-up** and if local residents have any say in the matter it will be the authorities, local and central government, who will have to fix the mess that is occurring on their watch. We know enough now to stop building in places and in a manner that will leave residents living in flood prone homes as the impacts of global warming increase. This year's flooding from Cyclone Gabrielle should be a warning to councils and central government not to ignore the needs of residents who find themselves stranded in flood prone areas.

Low Lying Land

Fear of being surrounded by cheap rental complexes is upsetting enough but the major threat to homes in Bluebell Lane is our vulnerability to flooding. Post earthquake LiDAR readings identified that our lane had sunk relative to surrounding properties. The Earthquake Commission [EQC] made lump sum offers to buy out our increased flooding risk. I attempted to negotiate on the issue on the grounds that the buyout was not sufficient to raise our homes

above the new flood levels. EQC refused to bargain and when I raised the matter with the Minister for Earthquake Recovery she told me the issue had been settled. It was certainly not settled with me or my neighbours but EQC sent their offer to my bank which was still mentioned as an “interested party” in my property after I had paid my mortgage off years earlier. I instructed the bank to invest the money while I waited for a fair offer to raise my home above the newly designated flood levels. That money remains as a separate investment in my bank. Council has overlooked this planning opportunity to protect homes on sunken land **which should be identified as a “Qualifying Matter” under the MDRS for Woolston.**

Tsunami Risk

Bluebell Lane is also inside a “Tsunami Management Area” It is irresponsible to allow infill housing in that same zone thus allowing new homes to be built in the path of a tsunami. Perhaps councillors and staff should lose their indemnity so they can be held personally liable for the consequences of poor planning decisions. The potential danger to existing homeowners could be exacerbated if increased housing density is allowed in a tsunami management area. Bluebell Lane and other Woolston residents must depend on council to protect our homes and communities from floods and tsunami. We also need our local communities to remain functionally connected and not disrupted by mass rental housing.

I submit that Council is ignoring the plight of existing home owners who had liquefaction flood onto their properties from surrounding land following the 2010 and 2011 earthquakes. Council has also failed to address the issue of land that sank during the earthquakes and left existing home owners vulnerable to flooding from surrounding properties. Indeed Council has concealed the increased flooding vulnerability behind higher foundation requirements for new or rebuilt homes **leaving existing homes increasingly vulnerable to flooding on foundations lower than Council considers safe from flooding.**

Lack of Council Communication

Although council maps show our area as requiring new higher foundation levels Council has not contacted home owners to advise them of how existing homes might be protected from flooding or tsunami. Council has an obligation to clearly identify any flooding vulnerability to existing homes; and to mitigate the possibility of surrounding new homes on higher foundations and less permeable surrounding land channelling floodwater into lower lying areas. Residents on flood vulnerable land must be able to rely on Council to protect them. It is arguable that owners of houses sitting below safe floor levels should retreat, surely we have learnt that much post Cyclone Gabrielle. Combine our lower flooring levels with our homes being in a tsunami management area and the fact that ground water in Woolston is just below the surface, I am stunned that Council has not seen the need to, if not retreat from this area, at least restrict more housing. It is possible we may not need to retreat if any further infill development was restricted in this high risk area. Ignoring this issue and proposing increased housing density with higher foundations is irresponsible in the circumstances.

I appreciate the work performed by Council post earthquakes to provide holding ponds to alleviate flooding but as Council’s own proposals indicate, new houses crammed together on impermeable land need to be built with higher foundations than we and other existing homes in this area have. It seems inevitable that we will be flooded when the waters rise. **What existing residents need is much better drainage, less crammed in housing and more permeable surfaces** if we are not to slip under future floodwaters. Existing home owners cannot do anything about their land having slumped but it would be a grave injustice if our homes were to be flooded because greater housing density contributed to water flooding into lower lying houses. Council has this one chance **and** the responsibility to protect residents from future disasters by identifying Bluebell Lane and other land that has sunk as a “Qualifying Matter” due to it being a “...High Flood Hazard Management Area [and] Flood Ponding Management Area...”. In addition to **addressing existing drainage problems, the high water table, and ensuring the retention of adequate surrounding permeable land, Council needs to restrict housing density in Woolston around homes already experiencing increased flooding vulnerability.**

Housing Developments Woolston 2022 and 2023

1. **6 Manning Place:** Four two storey units surrounded by mainly impermeable paved surfaces.
2. **5 Manning Place:** Contains four single storey units surrounded mainly by impermeable hard surfaces. Both Manning place developments shot up without my even being aware of any demolition or building.
3. **38 Wildberry Street:** Locals heard the original house being demolished, it is being replaced with five two storey units. This property sits behind Bluebell Lane which has been identified post earthquakes as having an increased vulnerability to flooding. When impermeable surfaces are poured around these units the likelihood of flooding in Bluebell lane will further increase. EQC's payout to home owners was based on LiDAR information post 2010 and 2011 earthquakes. Increasing sealed surfaces around Bluebell Lane will undoubtedly increase our flooding risk.
4. **54 & 56 Wildberry Street:** This development proposes the demolition of two houses to be replaced by nine two storey units. The bill board shows impermeable surfaces and **the sign promotes the houses as investment opportunities, in other words rental properties.**
5. **79 Wildberry Street:** One house has been replaced with 5 units surrounded by the usual impermeable surfaces.
6. **100 Wildberry Street:** Single storey units of an unknown number.
7. **112 Wildberry Street:** Another five units replacing one house, these new units are two storied.
8. **456 Ferry Road:** Temporary social housing of 11 single storey units which appear to have one bedroom each.
9. **6, 8, & 10 Hopkins Street:** These five units are older community housing and residents change continually.
10. **15 Hopkins Street:** Four single storey units.
11. **18 Hopkins Street:** Four units.
12. **22 Hopkins Street:** Number of units as yet unknown.
13. **24 Hopkins Street:** Number of units also as yet unknown.
14. **5 Findlay Place:** Six single storey units surrounded by large paved areas.
15. **52 McKenzie Ave:** Single home on generous section, the only single home newbuild neighbours have observed.
16. **84 Richardson Terrace:** There was a single red brick house on the site which has been empty since before the 2010 earthquakes. The house has subsequently been rebuild and the garden has returned to its unkemp state as the house remains empty. This is land banking at it's worst. Woolston suffers some of the worst extremes of housing policy, nobody does anything about it and aside from residents who walk the area, no one cares.
17. **McKenzie Ave Foot Bridge:** Rats are breeding rapidly near the seat on the Richardson Ave site where people feed bread to the ducks. One recently arrived resident sits on the seat daily and openly feeds the rats! Again nobody seems to care.

A cycle ride round the above mentioned streets on 19 April 2023 revealed a number of surrounding properties on the market and several others appear to be unoccupied as residents begin to abandon the area. I wish I could join them but the challenge is beyond my means.

Cheryl Horrell
 10 Bluebell Lane
 Woolston
 8023
20 April 2023

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 22/04/2023

First name: Guy and Anna

Last name: Parbury

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Oppose

I seek the following decision from the Council

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

19 Radnor Street, St Albans, Christchurch

My submission is that:

As Christchurch city continues to grow, housing intensification is essential for creating a sustainable environment. The research shows that intensifying the housing supply in a city can reduce costs for both the government and residents. It can also create a stronger sense of community, encourage walkability, and promote sustainability. With our governments smart housing intensification solutions, we help Christchurch city become more livable, vibrant, and affordable for all!

I oppose the sunlight access qualifying matter that is part of Christchurch Councils proposed plan as it is delaying new construction to the new standards within our city for such an extended long period which impacts our economy and our desire for a vibrant new Christchurch city.

With the qualifying matter proposed by Christchurch council, the height restrictions would not majorly differ from the existing limits on residential building heights currently imposed on the city, and particularly in our city fringe suburbs such as St Albans, Sydenham Edgeware and Addington, where site widths are typically less than the 15m 'common dimension' assumed in the Section 32 Sunlight report. Therefore not achieving the outcomes intended by the government housing intensification legislation.

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 23/04/2023

First name: Andrew

Last name: Tulloch

Preferred method of contact Postal

Consultation Document Submissions

Provision: Chapter 14 Residential

Oppose

I seek the following decision from the Council

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

Full notice given to entire residents of a street regarding any new house development that is outside the norm

My submission is that:

Affects well being of existing residents by loss of privacy, sunlight and overcrowding

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 23/04/2023

First name: Kathryn

Last name: Collie

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Seek Amendment

I seek the following decision from the Council

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

Less restrictive recession plane rules to enable the increased density intended by the Government

Prioritise and make an early determination on the recession plan qualifying matter

My submission is that:

As Christchurch's population increases, housing intensification is essential for creating a sustainable and liveable city. Research shows that intensifying the housing supply in a city can create a stronger sense of community, encourage alternative transport modes (such as walking, cycling and public transport), and promotes sustainability through efficiency of resources. Increasing the number of people living close to existing commercial and community centres is essential to prevent urban sprawl and to ensure adequate housing is available and affordable.

While I support the intent of the Plan Change 14, being to increase the density of housing, I disagree with the proposed sunlight access qualifying matter. The recession plane rules proposed will not have a material impact as they are only slightly less restrictive than the rules under the current District Plan. The case study assumed in the Section 32 Sunlight report states that 15m is a common site width in the city. This is not the case in city fringe suburbs such as St Albans, Sydenham and Addington, where site widths are typically narrow and therefore the additional height required to increase density cannot be achieved. The proposed recession plan rule will therefore not enable the outcomes intended by the government housing intensification legislation.

The process to date has also been very unclear and lengthy, resulting in significant cost to those wanting to develop and protracting the programme of residential building the city by years. I request that the Independent Hearings Panel make an early determination on the recession plane qualifying matter given the Council's stance has removed the intent of the MDRS having immediate legal effect and to provide certainty to those that have been blindsided by the u-turn and have plans that are compliant with the MDRS ready (or already) lodged for building consent.

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 23/04/2023

First name: Martin

Last name: Jones

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Seek Amendment

I seek the following decision from the Council

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

Cashmere View street is very close to Cashmere High School and as such is very much in demand for families with several children to be in zone for their future schooling. High density housing is not conjusive to these larger family groupings.

My submission is that:

I support my street becoming a heritage value residential character zone. Also I would like resource consent be a requirement before any development can take place.

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 23/04/2023

First name: Andrea

Last name: Heath

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Oppose

I seek the following decision from the Council

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

My submission is that:

Buildings up to 14m (generally 4 storeys) that are constructed without resource consent would significantly impact on our quality of life, further infill housing/ and buildings more than 2 storeys high would significantly impact on both our sunlight access and increase noise pollution as well as having significant negative impact on road usage, street parking and overall wear and tear on roads. Sunlight is vital to health homes and improved mental health

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 23/04/2023

First name: Jane

Last name: Murray

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Oppose

I seek the following decision from the Council

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

My submission is that:

I strongly oppose the plan change which allows easier intensification of residential land. This level of intensification is detrimental to the city, will force families out of the city and allow developers to build future ghettos. It is not appropriate for christchurch.

Provision: Chapter 14 Residential

Support

I seek the following decision from the Council

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

My submission is that:

I strongly oppose the plan change that will make residential intensification easier. This level of intensification will be detrimental to the city as it will reduce tree cover, block sunlight to neighbouring properties, force families out and allow developers to build future ghettos. It is not appropriate for our city and Councillors should have voted against it.

Provision: Chapter 14 Residential

Oppose

I seek the following decision from the Council

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

My submission is that:

I strongly oppose the plan change that will make residential intensification easier. This level of intensification will be detrimental to the city as it will reduce tree cover, block sunlight to neighbouring properties, force families out and allow developers to build future ghettos. It is not appropriate for our city and Councillors should have voted against it.

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 24/04/2023

First name: Rex

Last name: Drummond

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 13 Central City

Seek Amendment

I seek the following decision from the Council

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

My submission is that:

My area/house should be a suburban character area

Provision: Chapter 14 Residential

Seek Amendment

I seek the following decision from the Council

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

My submission is that:

Resource consent should be required before ANY development can proceed.

The area/house should be a suburban character area.

Our proposed Housing and Business Choice Plan Change (14)



Submitter Details

Submission Date: 24/04/2023

First name: Patricia

Last name: Dench

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Seek Amendment

I seek the following decision from the Council

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

that resource consent should be required before ANY development can proceed on Plan Change 13/14

my area/house should be a suburban character area;

on Plan Change 13/14

My submission is that:

my area/house should be a suburban character area;

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 25/04/2023

First name: Les

Last name: Drury

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Oppose

I seek the following decision from the Council

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

I ask that a resource consent be required before any development can proceed. My street should be a heritage value residential zone.

My submission is that:

My area house at 1/19 Fairview St should be a zoned suburban character area.

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 25/04/2023

First name: Grant

Last name: McGirr

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Oppose

I seek the following decision from the Council

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

My submission is that:

I oppose any changes that allow for higher buildings to be built in residential areas than currently exist, this includes any changes to the recession plane which lessen the amount of sunlight a property receives.

If the proposed changes go through I will lose sunlight coming into my living area and other rooms if developers build to the new height maximums. Many others face the same kind of problem. The loss of sunlight would be a major blow to my mental health and happiness. The proposed changes are not needed in Christchurch and would be a blow to the cities livability.

My submission is that no changes are allowed that may lessen the amount of sunlight that any property (house and land) currently receives.

Our proposed Housing and Business Choice Plan Change (PC14)

Submitter Details

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

Preferred method of contact Email

Postal address: Unit 102, 277 Kilmore Street

Suburb: Christchurch Central

City: Christchurch

Country: New Zealand

Postcode: 8011

Email: peterjbecknz@gmail.com

Daytime Phone: 021654445

Age: 65-79 years

Gender: Male

Ethnicity: New Zealand European

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

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

Note to person making submission:

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

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

☐ Yes

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

Attached Documents

File
Submission to CCC Heritage Plan change 14

Submission to the Christchurch City Council on Heritage Plan change 14

By: Peter Beck

24.04.2022

Contact: peterjbecknz@gmail.com

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

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

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

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

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

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

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 26/04/2023

First name: Linda

Last name: Barnes

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Seek Amendment

I seek the following decision from the Council

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

If it is possible to increase the meterage from boundary fences to new builds, I support that, so that there could be increased sunlight to lower levels. If it is possible to decrease the heights allowed of new builds, I support that for the same reason.

My submission is that:

That the Schedule of Significant and Other Trees, currently included in the District Plan, becomes a Qualifying Matter.

That the Sunlight Access Qualifying Matter is further changed to allow sunlight to go lower in the winter months. The CCC's changes are good but they don't stop ground floors losing sunlight for five months a year, which is extremely unfair and unnecessary in Christchurch

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 24/04/2023

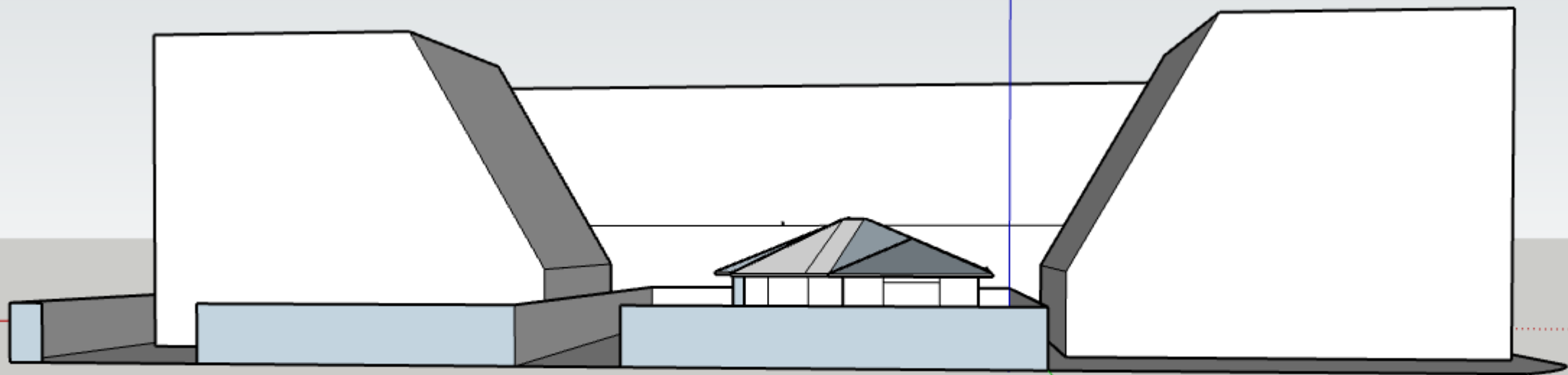
First name: John

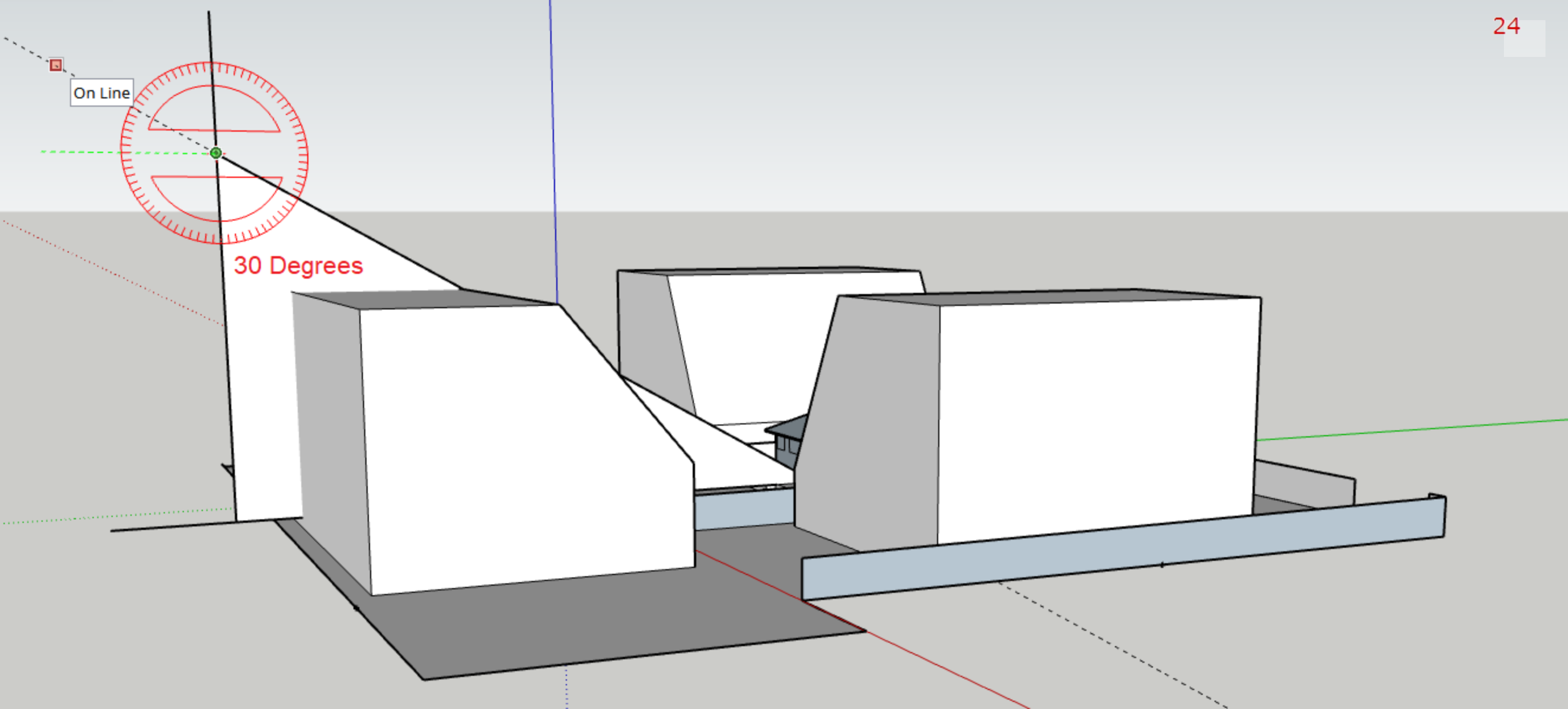
Last name: Hurley

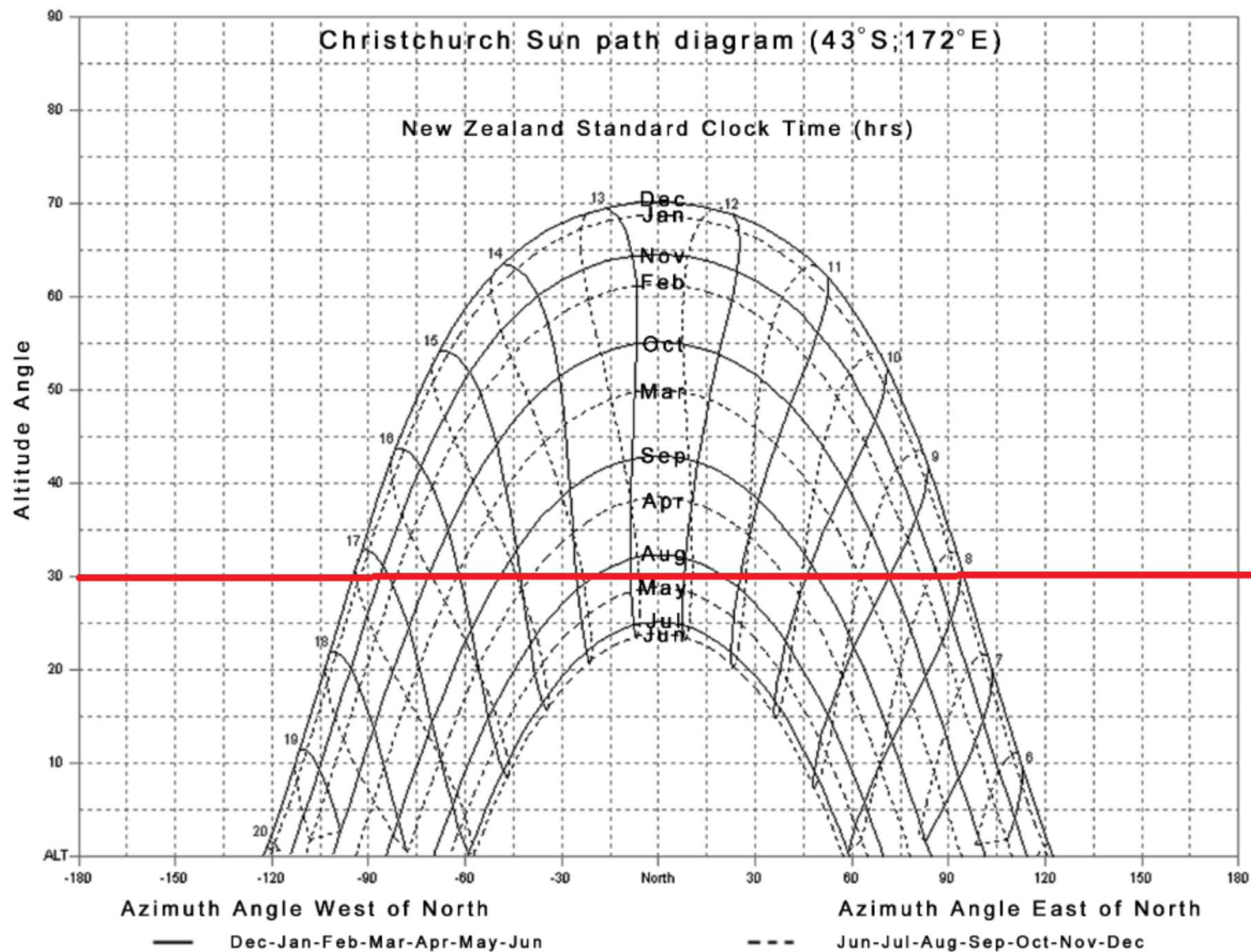
Preferred method of contact Email

Attached Documents

Name
89 Suva Street







Subject: Re: Submission decision sought and reasons

The diagram shows the potential effect on my house. It allows grid ironing by a developer.

I misunderstood the submission process but it appeared to be largely a fait accompli.
This was my original submission:

I wish to make a submission on Plan 14 changes. I live at 89 Suva Street Upper Riccarton (proposed as High Density Residential).

The plan changes mean I could loose all afternoon and morning sun to the East and West.

Form about now (20/04/23), the 30 degree angle begins to shade my north facing french doors as shade creeps across the floor.

A clothes line will no longer be effective and the use of the log burner will increase and/or electricity consumption.

This is a 3 bedroom house more suited to a young family than a 71 year old (and wife), however I spent a lot of time renovating it as I didn't want to pay a premium to move elsewhere.

My neighbor also looked around but found alternatives unaffordable. "Down sizing" is a myth because small is (often) a box without amenities.

I would support a system such as that suggested by Dr. Susan Krumdieck. In Singapore they would knock down a whole block (paying fire-sale prices) and rebuild with flair. Developers, however, have too much incentive to squeeze as many houses as possible on one site. If you look around Christchurch we have shoddy infill and badly cited housing. I also note that 30% of developments have faults (inconsistent with previous plan).

<https://www.youtube.com/watch?v=fTrj2f9t3So&t=2028s>

There seems to be a prioritising of openness (immigration) and a deprioritising of livability as for the less well, off as though it is a luxury we cannot afford. In 1936 Michael Joseph Savage stated: *"We have visions of a new age, an age where all people will have beauty as well as space and convenience in and about their homes"*. The people holding up signs saying "More Houses" appear to also favour *Open Borders* as a philosophy. The "brain drain" of nurses etc to Australia might also reflect the perceived reality of declining urban form.

In the 1990's I was living in (nearby) Acacia Avenue and had a family with a 2 year old from Japan stay. When they got back to Osaka and unlocked the apartment the two year old cried. She missed the lawn; the space; the beauty. A young Japanese replied with a sweeping gesture what he would do if he had a lot of money: "this". I have heard talk of Paris, Barcelona, "most livable city" [for highly paid trans-nationals] but the evidence is clear that people value amenities like sunlight and space and small cities (<250,000).

<https://www.sciencedirect.com/science/article/pii/S1877916621000059>

As for "Centrals" edict

The extra million in population added in a space of 15 years up to 2017 – that is an increase of either a quarter or a fifth depending on which starting point you use – came as a surprise to me, and I

suspect to most people who did not have a policy perspective on demography, population, migration. It is astonishing to me that this policy decision to grow New Zealand at this speed and

with almost no adequate preparation was never debated. That reflects badly on the political class, but also on the relevant public service, and on the universities. I

remember no public report or

briefing paper from INZ, and the impact of this new million has hardly been mentioned in the debate on rising house prices.

Peter Davis, Emeritus Professor of Population Health and Social Science, University of Auckland

12 December 2021

<https://www.productivity.govt.nz/assets/Submission-Documents/immigration-settings/DR-110-Peter-Davis.pdf>

The whole system is based on a lie contained in "skills-based migration program". We have *expression of interest* plus *chain migration* such that a wealthy middle class from India and China who are "escaping a degraded environment and overpopulation" [George Megalogenis to ANZSOG], bomb the economy with their spending. Meanwhile they displace locals (as they land at the *top*) and livability suffers. The benefits are concentrated while the costs are dispersed - productivity hasn't improved.

Prove me wrong.

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 25/04/2023

First name: Christine

Last name: Parkes

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Oppose

I seek the following decision from the Council

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

That the area of Cashmere View St, Fairview St and nearby Ashgrove Tce be made a suburban character area.

The resource consent be required before ANY development can proceed.

My submission is that:


We live in an area with well maintained character housing, large front set backs, beautifully maintained gardens and minimal front fencing. This is a special area of neighborhood honoring the original 'garden city' culture of Christchurch.

We have all strived to maintain the original character following our EQC repairs to maintain the old character of Christchurch.

This area also provides a lovely transition from the beautiful near by green space of the Heathcote Opawo River.

To allow the proposed medium density residential zone in this area would be a loss to our neighborhood and the local area.

Attached Documents

Name	
14	



Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 27/04/2023

First name: Rosemary

Last name: Fraser

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 6 General Rules and Procedures

Oppose

I seek the following decision from the Council

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

Please make sure that wind+winter conditions are also taken into consideration along with changes in sea level which you are taking into consideration.

My submission is that:

I oppose change to height limits. Wind tunnels occur between taller buildings as happens on Colombo Street between the library and TePai. As Christchurch experiences strong winds and is flat, it could create dangerous situations if there are tall buildings on both side of street.

I oppose having buildings 90 m tall. Even with appropriate foundations they would still sway terrifying people on the higher floors. Also, the taller the building the more difficult it would be to escape if there was a fire. Also, with increased shading, there is likely to be for ice on paths for longer in winter.

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 25/04/2023

First name: Steve

Last name: Parkes

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Oppose

I seek the following decision from the Council

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

That the area of Cashmere View St be designated as a suburban character area.

That resource consent should be required before ANY development can proceed.


My submission is that:

Whilst I support Medium density residential zones, to limit urban sprawl, however feel that not all areas of Christchurch urban area should be zoned this way.

We are some distance from shops and business and adjacent to the beautiful green space of the Heathcote Opawaho River.

Our street is characterised by a number of original well maintained character houses, with large well maintained gardens, large front set backs and a number of unfenced front boundaries. The character of this area should be preserved to maintain the original 'Garden City' development of Christchurch and provide a transition between the green outdoor space of the river and hills towards the denser housing near the city.

Attached Documents

Name	
14	



Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 25/04/2023

First name: Alastair

Last name: Grigg

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Oppose

I seek the following decision from the Council



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

1. Change the current Residential Medium Density (RMD) zone at the eastern end of Rugby Street to the new Medium Density Residential (MRZ) zone, rather than the proposed change to the new High Density Residential (HRZ) zone.
2. Retain an 11m height limit for this new Medium Density Residential (MRZ) zone, as per the limit in the current RMD zone.

My submission is that:

We strongly object to the proposed increased height limits on the current Residential Medium Density Zone (RMD) in Merivale - in particular the increased residential development height limit of 14m in the proposed High Density Residential (NRZ) Zones (Local Centre Intensification Precinct areas). While we understand that there is a need for more housing in our community, we believe that this plan will have a negative impact on our community in several ways. See attached documents for more details.

Attached Documents

Name
Shading Analysis 110 Rugby Street 
District Plan PC14 submission - A Grigg 

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 25/04/2023


First name: Alastair

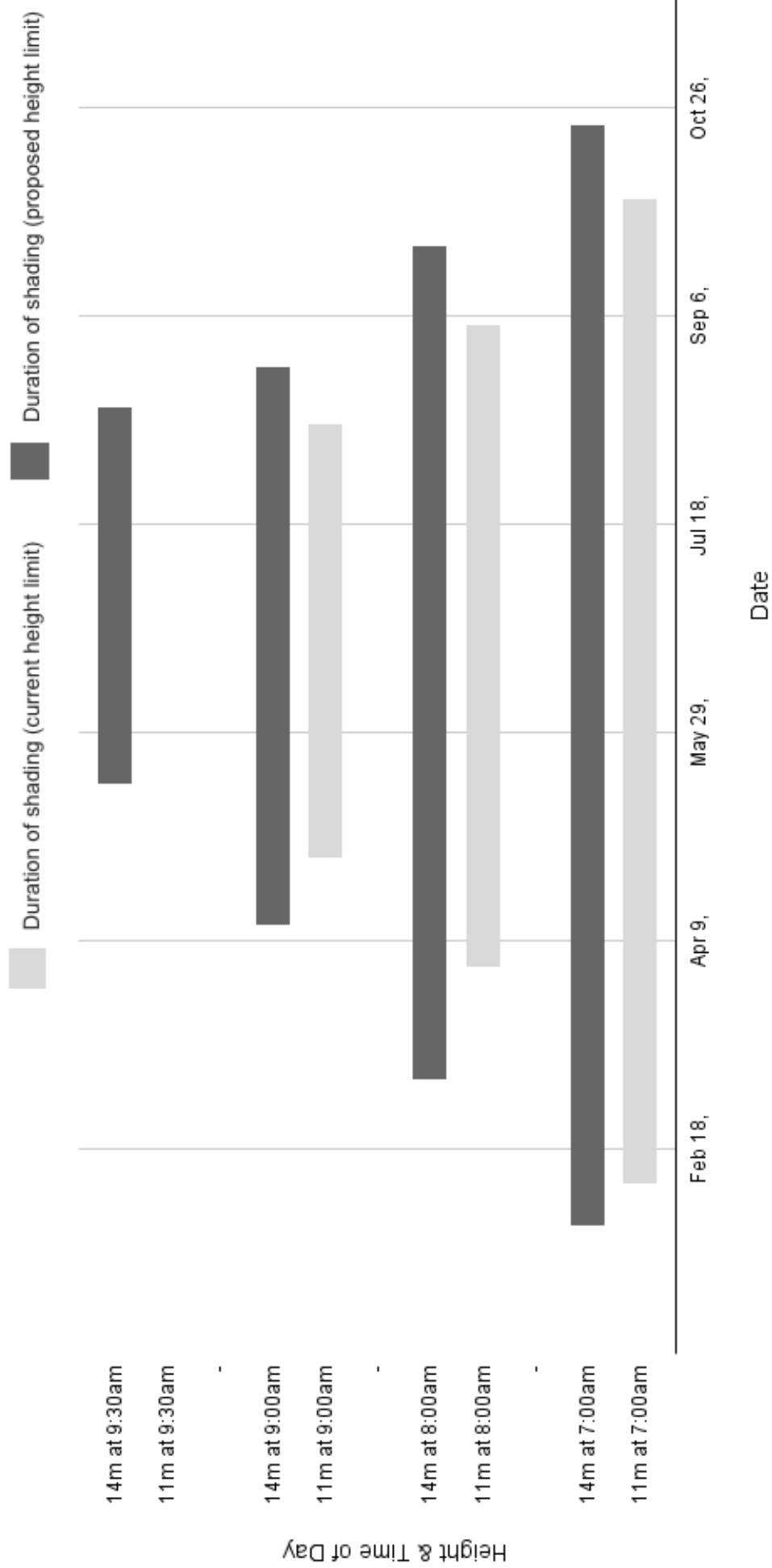
Last name: Grigg

Preferred method of contact Email

Attached Documents

Name

Shading Analysis 110 Rugby Street 



Submission from Alastair Grigg

We strongly object to the proposed increased height limits on the current Residential Medium Density Zone (RMD) in Merivale - in particular the increased residential development height limit of 14m in the proposed High Density Residential (NRZ) Zones (Local Centre Intensification Precinct areas). While we understand that there is a need for more housing in our community, we believe that this plan will have a negative impact on our community in several ways.

Shading

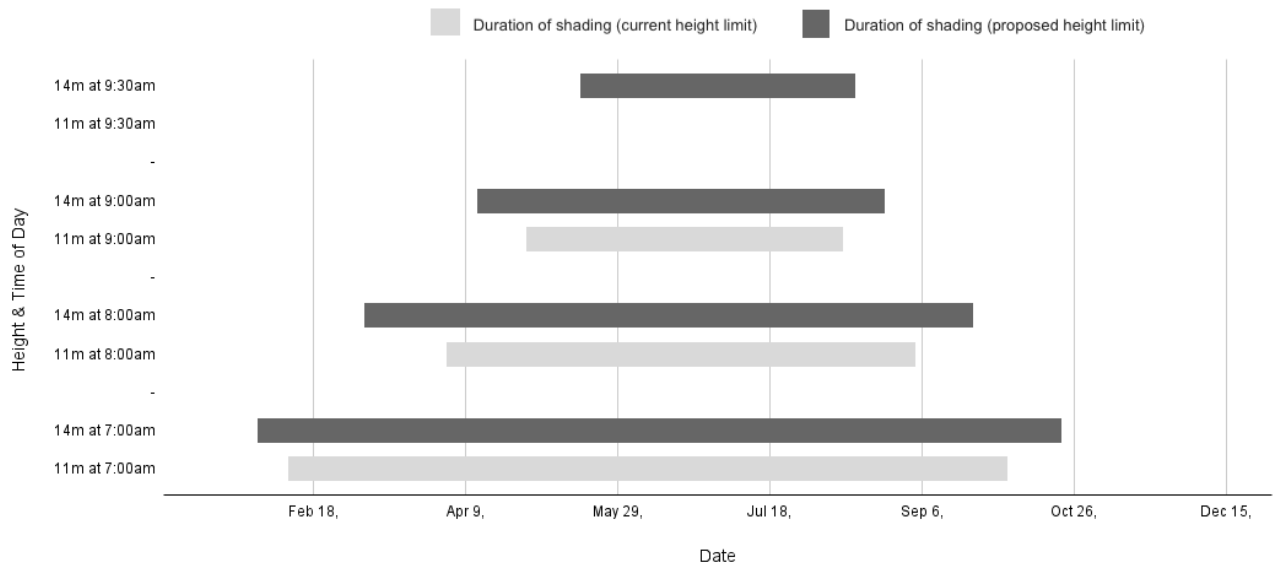
Firstly, the increased height of the buildings will result in significant shading and loss of sun heating for surrounding properties. This will have a detrimental effect on the liveability of the area and negatively impact the quality of life for residents.

To illustrate the impact of the proposed changes we have modelled the shading that would result from the development of three 4 story (14m high) residential buildings on the currently vacant section at 122 Rugby Street, which is 40m east of our family's two story residential property at 110 Rugby Street.

This modelling has shown that the increased height limit from the current 11m limit to the proposed 14m for this development would have the following shading impacts on our property;

- Cause significant shading at 8am to occur for 200 consecutive days of the year, from 9 March until 24 September. This is an increase of 46 days or 30% longer compared with shading under the current height limit
- Cause significant shading at 9am to occur for 134 consecutive days of the year, an increase of 30 days or 29% longer compared with shading under the current height limit
- This significant shading would continue to occur after 9am and through until at least 9:30am for 90 consecutive days of the year, compared with no significant shading past 9am under the current height limit

See attached chart illustrating the increased duration of significant shading at different times of the morning throughout the year.



Obviously this significant shading impact would be even worse for properties located any closer to a new 4 story development of this nature.

Parking & Wastewater

Secondly, we are concerned that there is not enough consideration being given to the provision of adequate car parking for residents of such high density developments. Merivale is already facing significant parking pressures and increasing the number of residents without adequate parking provision will exacerbate this issue.

Similarly, we are concerned that there has been insufficient in-depth analysis and stress testing of the waste water system capacity in the Merivale area to cope with the level of additional residential development that would be possible under the proposed High Density Residential Zone.

Character and Aesthetics

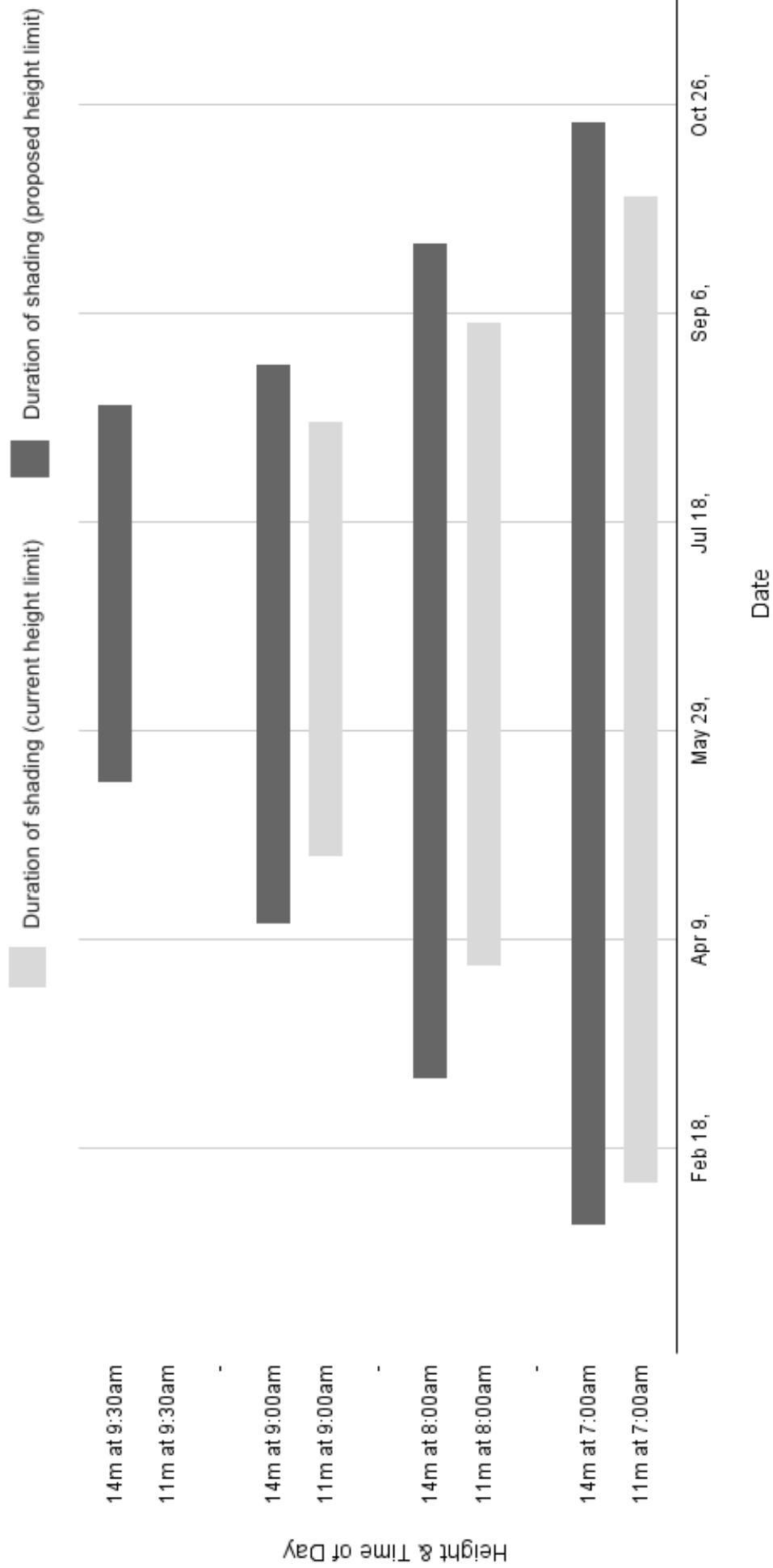
Furthermore, four-story buildings are not inline with the character of the Merivale community. This will result in a negative visual impact on the area and detract from the community's overall aesthetic.

In conclusion, we strongly object to the proposed increased height limits on the residential medium density zone in Merivale. We urge the Christchurch City Council to reconsider this plan and take into account the concerns of local residents.

Thank you for your time and consideration.
Sincerely,

What do we want the Council to do

1. Change the current Residential Medium Density (RMD) zone at the eastern end of Rugby Street to the new Medium Density Residential (MRZ) zone, rather than the proposed change to the new High Density Residential (HRZ) zone.
 2. Retain an 11m height limit for this new Medium Density Residential (MRZ) zone, as per the limit in the current RMD zone.
-



Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 25/04/2023

First name: Malcolm

Last name: Leigh

Preferred method of contact Postal

Consultation Document Submissions

Provision: Chapter 14 Residential

Seek Amendment

I seek the following decision from the Council

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

The classification of Blair Avenue in Papanui as a High Density Residential Zone be rescinded, and re-classified as Medium Density.

My submission is that:

Blair Avenue and similarly limited dead-end streets in Papanui are incorrectly zoned as High Density Residential.

See attachment for detailed reasons: esp. traffic, trees, flooding, visual character.

Attached Documents

Name
Council submission 2023

Submission to the Housing and Business Choice Plan Change 14

Introduction

Many of the comments in this submission were previously submitted in our submission for the Draft Housing and Business Choice Plan Change. However as many of the concerns we raised don't appear to have been adequately addressed, they now relate directly to the Housing and Business Choice Plan Change 14 document.

Since I am not privy to current District Plan constraints and the fact that many of these may be intended to be carried over to the current council Plan Change 14 proposal for higher density residential housing, some of the comments included in this submission may already be included, and therefore may not constitute changes to the proposal

Extent of proposal:

Very little reference is made in the "Have your say" documents to any concerns regarding the influence of the proposed housing changes on **existing services, traffic density, street access and other similar issues which already exist** and will be considerably further exacerbated by the current proposals. (Some reference is made to sewerage servicing limitation and tree removal, the latter is commented on further in this submission). No confirmative/investigative data appears to have been provided to support many of the suppositions made in the Plan 14 proposal. e.g

The assumption in the Housing Choice document appears to be that the majority of residents in the High Residential Zones **will walk** to the suburban commercial centres. *On what data analysis/survey has this assumption been derived?*

Personal observation of living within one of these suburbs, i.e. Papanui, indicates that this assumption **is not correct**, as a large proportion of the local inhabitants of the current social demographic residents do not actually walk to the business areas or work there-in. Many are long term, generational persons who are less inclined for multiple reasons, to walk. Social engineering by discouraging the retention of the aging population exacerbates the problem further, as the younger population replacements are also less likely to walk.

*Where is the research justification for the assumption that **jobs will be provided locally** to accommodate the expected population density increase associated with infill housing?*

This seems very optimistic since currently most local inhabitants in employment move out of the local area for their employment. Even if the business community does increase job opportunities to some degree, the proposed increase in high density housing occupation will far surpass this increase in job opportunities, hence generating more traffic to move these people to their places of work.

Any as yet, unspecified practical rapid transit solutions to an already overloaded transportation system are very unlikely to change these local issues raised above, either road, rail or a combination of both.

Although the issues registered below are primarily and initially specific to aspects of how these housing proposals impact Blair Avenue in Papanui, they may be present in a number of other areas of Papanui, and possibly other regions citywide.

In an existing well-established (developed) non-greenfield location infill housing developments within the city are not generally the result of local job opportunities or the prime concern of the developer: who is generally motivated by profit margins. There appears to be a wide disjoint between local job opportunities and where you reside. This is obvious in areas already under

development in Christchurch where large populations have very little opportunity to be employed in the same locale as they are residing. However, such diverse communities avoid the very unsatisfactory stratification i.e narrow uniformity, which can otherwise occur for groups within society. The infill housing recommendations gives no recognition of such negative societal changes on existing suburbia.

In this submission the following suggestions / modifications have been assumed to be required to be included as qualifying matters, but this should not limit their consideration if there are more relevant part(s) of the document where they would individually be encompassed.

In respect specifically to Blair Avenue and its environs, but not necessarily in order of priority

1. Traffic

Blair Avenue is indicated in the Plan 14 document as being in a high density residential zone, subjected to a possible increase of height / 20 metres. The number of vehicles associated with the increase in local residency resulting from the proposed housing changes is likely to be at least 3-4 times what it is currently. This is for an existing one entrance, dead-end street, where current residential motor vehicle numbers are high (with employment locations predominantly in other parts of the city) and in which local street parking is regularly fully utilised by the Harcourts Real Estate business (located at the East end of the street) for the purposes of facilitating the holding of multiple auctions on currently up to 3 days of the week (though this was not included in the original consenting process). Added to these traffic movements is the traffic egress from the KFC fast food business drive-thru on to Papanui Road via Blair Ave; and the rear parking and access to/from additional shopping activities adjacent to Harcourts i.e. BP petrol station, Animates and Art Metro. Street parking spaces are currently being utilised daily as long term parking by people working elsewhere in other parts of Papanui. Such a high density housing development as being proposed in Plan 14 will completely overload the capacity of this street to cope safely with the volume of traffic for most periods of the day (even if off-street parking were to be reintroduced as a requirement of any future residential development in this street). There appears to be no recognition of **parking needs, traffic flow volumes in and out of the street**, and any satisfactory resolution of these (and any other associated Papanui road traffic concerns) in the proposals as presented. Papanui Road in the Papanui area has already become a very congested, difficult to access, slow moving local traverse, and main arterial thoroughfare during much of the day. With the proposed increase of commercial building height allowance, to 22 metres within the suburban commercial centres, there appears to be no requirement for sufficient additional onsite parking within such developments. Hence such developments will add further parking pressures on nearby high density zoned streets, as is already occurring, see above.

2. Demographic make-up

The proposed housing changes will subtly encourage older aged residents out of their existing homes into accommodation such as retirement villages etc. This is contrary to recognised World Health advice to retain these people in their own homes for as long as possible to enhance and prolong their end-of-years quality of life and their contribution to their local community. Considerable changes to the current mixed demography of the street will be an irreversible deleterious consequence to the social interaction between and within different age groups within the local populations, if the high density zone housing proposal proceeds without modification. Such a narrow population sanitised age-band will destroy or

considerably limit the interactive social support that a more diverse demographic can provide and could lead to undesirable social discord.

3. Trees

With developers prone to profit making rather than having a genuine concern for the long term environmental benefits of trees, replanting of trees on site will not generally be seen as a viable option when endeavouring to maximise space on the allotment given to housing. From technical documentation used to support the “Have your say” document, a figure of 20 years is used as the time required for a replacement tree sapling to mature into a size similar to that which was removed. For most of this “growing” time the allotments will be deprived of the mature tree coverage. Hence a 20% onsite tree canopy will take years to develop (a generational loss). Since this is likely to occur over a large area of the street, the area realistically becomes denuded of trees for extended periods of time. During this extended time the social and visual environmental benefits of the original tree coverage is non-existent.

The proposal for future developers to be required to provide **financial contributions** for the planting of trees in other locations of council land, in lieu of, and to compensate for, removal and non-replacement of existing trees on the development site, while a useful adjunct to maintaining tree coverage in the city and placating paper statistics, **does not necessarily mean that tree coverage in the local area is not completely and permanently removed**. In the case of Blair Avenue this is starkly evident already, where tree removal from development sites has almost been par for the course without any apparent requirement for any tree replacement on the site itself. Such tree removal, even if site-replaced, also results in a growing long-term disruption / dislocation of the tree canopy corridor potentially available for the movement of native birds in the district. The current lack of tree retention accountability has also resulted in total denudation of trees in some areas of this street. This has become increasingly evident over the last decade and not just in Blair Avenue. If one compares aerial photographs of the region from a decade ago with now, the loss of tree canopy is quite evident. With no current requirement for local replacement of said trees, I strongly suggest that no further substantial-tree removal be allowed for Blair Avenue, and that some way of restoring equivalent canopy to that already lost be implemented as soon as possible.

Gardens, including trees, are considered to be an important holistic requirement for social wellbeing. By the removal and non-local replacement of trees of equivalent size such action contributes, as a direct consequence, to permanent changes to the characterisation of the locale. Unlike any new green-field housing development, infill housing changes to existing suburban streets will take place over a considerable number of years and thus intensifies and prolongs or permantises these negative consequences raised in this submission.

Provision of trees in lieu, in another part of the city, (although maintaining the citywide proportion of tree canopy) does not compensate for breaking an existing corridor.

Maybe a better “carrot” for **tree retention** would be to encourage some form of carbon-credit based benefit to the home owner/developer. Such a provision would also assist in achieving the intentioned national/local zero carbon status whilst encouraging the retention of existing mature trees.

Previous attempts by Christchurch City council staff to encourage street beautification by planting tree saplings in the street berm itself have not been as successful as anticipated. Since the street is adjacent to a commercial zone it is subjected to a very high personal

mobility presence. Tree vandalism, damage caused by cars and similar actions have ended up with such restoration attempts being discontinued after a number of repeat replantings. Such negative anti-social behaviour is likely to be exacerbated and to intensify the difficulty of retaining street tree plantings due to the projected considerable increase in population density if Plan 14 is proceeds unaltered.

4. Recreational facilities

By only giving emphasis to increasing the number of new houses in an area, no commensurate measures appear to have been made to providing for the social needs of the increasing number of inhabitants thereby added to the area, i.e playgrounds, provision for outdoor sports, recreational facilities and the like. Overseas experience would emphatically suggest that lack of such nearby resources and facilities rapidly leads to a decline in social wellbeing and the increase in many aspects of unacceptable antisocial behaviour (as occurred in, and is still affecting, many earlier New Zealand social housing developments, including those in Christchurch, where lack of open spaces was and is found to be a major contributor to such behaviour). Therefore increased housing density, in conjunction with the corresponding decreasing available allotment size, should not be considered on its own before AND ONLY AFTER such issues are satisfactorily addressed and co-jointly implemented. Without such facilities family orientated activities (including the recognised well-being needs of children, their guardians and their pets) are inadequately supported and are detrimentally influenced permanently.

5. Flooding

With the increase in proportion of impenetrable non-absorbent surface within the wider local area of the Dudley Creek catchment, arising from infill housing, the propensity for occasions when storm water runoff volumes are large will increase considerably. The Dudley Creek walled waterway channel currently DOES NOT provide adequate capacity to prevent street flooding in Blair Avenue in current excessive storm events, even with repeated current Council attempts to alleviate the problem. The number of such events will be exacerbated by climate change. It will not be just a matter of keeping the existing waterway clear, as this action is currently provided, yet still results in overflow and flooding of neighbouring properties. When the creek bed is full of water any below ground discharge of water to the creek (e.g from field drains) is impaired thereby adding to the local flooding problems.

6. Neighbourhood visual character

The removal of or assumed non-need for resource consents, and also the associated elimination of neighbourhood notification for proposed developments means that the neighbourhood loses the ability to have an input into influencing the final outcome of the proposed development, its impact on the neighbourhood social well-being and the degradation of local visual character e.g number of such structures close together. In the artist impression page 22 for a Medium Density Residential Zone, the effects of multitude box-like structures, very close together, with very little relief, and lack of variety in style, all have a negative effect on the visual appearance throughout the street. The omission of buildings from the adjacent rear street, i.e the blank grey area in the middle of the picture, provides a more optimistic impression than if that area (as is more than likely) were filled with multi-storey residences. These negative effects are further amplified when considering 6 storey buildings in high density residential locations.

As a result there is a propensity for the area to eventually become a middle class slum/ghetto, particularly if in all probability the housing ends up becoming rental accommodation, where there is generally a priority present for concerns with \$ outlay or \$ return by both tenant and landlord rather than with social well-being or house pride. Similarly long-time residents who have spent many decades enhancing their dwellings could suddenly find themselves effectively boxed in on all sides and being overlooked by multiple 4-6 storey units, with no ability to raise concerns such as loss of privacy, lack of sunshine, diminished view. An average tree, planted to soften the visual impact, may be a conciliatory solution for existing neighbours towards a new 2 storey structure but would be a wasted gesture for structures exceeding that height. Most residents who have toiled creating their own pocket of sanctuary wish to be able to enjoy the fruits of their labour without having their every movement visible from a 5 storey window next door.

Most street frontages, if the High Density Zone ideas are enshrined without considerable modification, will remove large trees in these areas as portrayed by the scant, non-concealing shrubbery and absence of any substantial trees illustrated in the High Density Residential Zone illustration page 10b.

What is the proportion of residential suburban streets in the Papanui High Density Residential Zone that are 4 car-wide with large berms and footpaths, as portrayed in the illustration on page 10b? Not many, given that many of those streets were narrowed when the existing berms were widened.

The High Density Residential Zone should not be applied blanketly either to a single street or to properties sharing a back fence. Restricting such developments would avoid the imposition of 20 metre or higher structures right alongside and surrounding the boundaries of a single storey residence as depicted on page 10b. Such a situation represented as on page 10b (and also is inferred for the Medium Density Residential illustration on page 22) for a single storey property would impose a considerable perverse outlook for the residents of the single storey residence in both instances with deprivation of privacy, compromised environmental amenities and elimination of other social well-being factors.

The suggestion that “such degradation of existing social values would be filtered out at the resource consenting stage” does not appear to provide sufficient safeguard to prevent such situations arising.

What assurances are there that Restricted Discretionary Activities, as listed in previous Christchurch City Council documentation, have been eliminated from Change Plan 14 and the requirements of Change Plan 14 will not be allowed to be over-ruled?

Similar discretionary situations are already occurring and causing ongoing neighbourhood angst throughout many parts of the city currently, even when involving the building of multiple 2-3 storey infill structures.

Consideration also needs to be given to limiting the number of 20metre structures in a single street, or adjacent streets in the High Density Residential Zone to ensure and provide for a well-mixed variety of different styles and outlooks to retain existing long standing visual, social well-being and neighbourhood aspects of a locality.

Some urgency needs to be given to ensuring the prevention of further desecration of the social character of existing locations which is already occurring under the current consenting process.

7. Subdividing existing sections

It is noted, that when subdividing an existing property containing an existing house, there is no minimum allotment size required or off street parking needed. However, important consideration needs to be given to the above points raised in this submission to alleviate the deleterious long term impact that the removal of existing safeguards will have; beyond the provision of so called more affordable housing and reduction in consenting requirements.

Changes suggested for the resource consenting process

With the removal of the need for resource consent and of neighbour notification in many instances when subdivisions of existing residential housed sites are being planned (as long as the planning stays within regulations) a layer of additional accountability when assessing the type, style, extent of the proposed development is lost. The inclusions of these provisions when included in current legislation has meant that some contribution by local inhabitants has often been available when considering the desirability / acceptability of the proposed developments for the area. If these opportunities for input are excluded or denied the onus for processing the building consent then becomes primarily an in-house town planning activity which, even with the best intentions, may not be in agreement with locale character as recognised by the inhabitants near the actual location of the development ; as opposed to those perceived in the planning office using the building code only as their guide. Under the current subdivision regulations there have been many instances throughout the city recently where developments have been strongly opposed by local inhabitants who by then have had little or no recourse for having their concerns to be effectively included in the outcome of the development (e.g style and extent of barn type constructions, the number of such structures close together, the proximity to boundaries and similar contentious matters). The artist impression on page 22 for Medium Density Residential Zone developments captures, to some extent, the underlying negative impacts that such developments are already having on neighbourhood well-being. As mentioned in section 6 of this submission, long-time residents could have spent many decades enhancing their dwellings and now suddenly find themselves effectively boxed in on all sides and being overlooked by multiple 3-4 storey units, with no ability to raise concerns like loss of privacy, sunshine, diminished view and similar. In the proposed High Density Zone as illustrated on page 10b the preferred retention of most of the mature or large trees is not adequately catered for. Such areas will end up like those portrayed for Medium Density Zone development as illustrated on page 22 – scant shrubbery with an absence of any substantial tree coverage but with the imposition of 4-6 construction.

The Change Plan 14 anticipates that a long gestation time-frame measured in a number of years, for the infill housing to occur, will be par for the course of the introduction of these Higher Density Zones. During that extended period of time (at least 20 years if replacement tree-growth is realistically included) degradation of the social values associated with an existing area are slowly being destroyed or deleteriously permanently modified and thus become irrecoverable (like the outcomes of many cancers or creeping gangrene)

Reflections

- While not necessarily disagreeing with the presumptive need to provide for a higher density of residents in the city remember that a one-solution-fit-all e.g conforming all berms to be the same, may not be desirable. High density housing in New Zealand is only a recent

concept being introduced from overseas where long historical periods of social adjustment have evolved. Therefore the translocation of such architectural societal practices is not always from a most appropriate source of compatibility.

- One would hope that due diligence has already been done on the projected ability of the current city services networks of water supply, electricity, reticulation, etc to cope with the obvious greater capacity-take by the intended x4 or greater increase in location use of these services throughout particularly the proposed High Density Zones. Any ongoing weaknesses or lack of capacity to handle maximum demands in these areas should be overcome or rectified PRIOR to the housing regulations being further changed from the existing. Similarly a more cohesive approach to aligning required service upgrades for these future developments would provide a more effective use of available finances as well as causing less disruption to the inhabitants affected.
- The Change Plan 14 document paints a much more rosy and over-optimistic view of the impact that these house regulation changes will have on the benefits (if any) or contribute positively to achieving / retaining a more holistic and satisfactory well-being of an existing diverse demographic local community. Little recognition appears to have been given to the social well-being factors which will be considerably and negatively affected by the provision of cheaper and more numerous housing opportunities. There is the distinct possibility, if this proposal goes ahead without major changes that deficiencies that have arisen from community orientated housing developments in the past, which had emphasis on cheapness and affordability, will be repeated with the consequential, already demonstrated, societal dislocation.

In conclusion, it is requested that the aspects raised, concerning

- Traffic,
- Demographic make-up,
- Trees,
- Recreational facilities,
- Flooding,
- Neighbourhood visual character,
- Subdivision of existing sections,
- Changes suggested for the resource consenting process

be given serious consideration during the assessment process, and that given the number of issues directly impacting Blair Avenue, **that Blair Avenue (a relatively short street, with only one access onto a congested major arterial road and a dead-end) be given a Qualifying Matter status of exclusion from the High Density Zoning requirements, and if possible no further increase in residential housing density be permitted in the street. Further, the subtle commercial zone creep which is occurring or being allowed currently by local business activity at the East end of Blair Avenue should now be curtailed.**

Thankyou.

Submitter:

Malcolm Leigh,
30 Blair Avenue, Papanui 8053

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 26/04/2023

First name: Doug

Last name: Latham

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 6 General Rules and Procedures

Seek Amendment

I seek the following decision from the Council

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

I seek the following change: bring back the acceptable solution method

My submission is that:

Seek amendment to 6.1.7.2.1 sensitive activities near roads and railways

My submission is to bring back the acceptable solution method as another means of compliance instead of having to engage an acoustic engineer

Provision: Chapter 6 General Rules and Procedures

Seek Amendment

I seek the following decision from the Council

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

I seek the following change: reduce canopy cover to 10%, avoid applying rule to single dwellings

My submission is that:

Seek amendment to 6.10A.4.1.1 tree canopy cover

My submission is that a 20% minimum threshold for canopy cover is too high, should be 10%. The tree canopy cover requirements should not apply to single dwellings, only to multi-units.

Provision: Chapter 6 General Rules and Procedures**Seek Amendment****I seek the following decision from the Council*****If seeking to make changes to a specific site or sites, please provide the address or identify the area:***

I seek the following change: add option to use rateable land value in lieu of valuation

My submission is that:

Seek amendment to 6.10A.4.2.2 financial contributions

My submission is re the method for calculating the land value, having to engage an independent registered valuer each time this is required is potentially time consuming and costly. Given there is already established information on land values by way of the rateable value assessments, suggest that an option is added to use the rateable land value as a basis as an alternative to a registered valuation.

Provision: Chapter 6 General Rules and Procedures**Oppose****I seek the following decision from the Council*****If seeking to make changes to a specific site or sites, please provide the address or identify the area:***

I seek the following change: remove requirement for a consent notice

My submission is that:

Oppose 6.10A.4.2.3 tree canopy consent notice

My submission is I oppose the need to have a consent notice registered on the title. This is very inflexible and if an owner wanted to make changes to their landscape design in future they would need to update their title along with the associated legal costs, this is even more onerous than making changes to a building. Suggest instead that the tree canopy can be an ongoing condition of the resource consent similar to how the current landscaping provisions are dealt with. This still gives the council the ability to enforce the rules if not followed

Provision: Chapter 7 Transport**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 seek the following change: revert back to current provisions for 1-3 units

My submission is that:

Seek amendment to andnbsp;Table 7.5.7.1 access design

My submission is the proposed minimum legal width for 1-3 units is excessive, the existing provisions are adequate. When there are only 1-3 dwellings there are not going to be a significant number of vehicles, pedestrians, cyclists etc so low likelihood for any conflict and safety issues. The more common scenario for this number of dwellings are single houses or when a second dwelling is added to the back yard of an existing house. The driveway width is often constrained when working around an existing dwelling.

Provision: Chapter 8 Subdivision, Development and Earthworks

Seek Amendment

I seek the following decision from the Council

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

I seek the following change: increase the 20m³ threshold


My submission is that:

Seek amendment to andnbsp;8.9.2.1 Table 9 earthworks

My submission is to increase the 20m³ threshold for residential sites, this is too low and most developments exceed the threshold therefore creating the need for a resource consent which would otherwise be unnecessary. Could add standard controls eg having a sediment control plan in place within the permitted activity status.

Please see the attachment for more feedback. Thank you.

Attached Documents

Name	
Doug Latham- PC 14 submission	

Doug Latham-PC 14 submission

Seek amendment to Table 7.5.7.1 access design

My submission is the proposed minimum legal width for 1-3 units is excessive, the existing provisions are adequate. When there are only 1-3 dwellings there are not going to be a significant number of vehicles, pedestrians, cyclists etc so low likelihood for any conflict and safety issues. The more common scenario for this number of dwellings are single houses or when a second dwelling is added to the back yard of an existing house. The driveway width is often constrained when working around an existing dwelling.

I seek the following change: revert back to current provisions for 1-3 units

Seek amendment to 8.9.2.1 Table 9 earthworks

My submission is to increase the 20m³ threshold for residential sites, this is too low and most developments exceed the threshold therefore creating the need for a resource consent which would otherwise be unnecessary. Could add standard controls eg having a sediment control plan in place within the permitted activity status.

I seek the following change: increase the 20m³ threshold

Seek amendment to 14.5.2.9 and 14.6.2.6 fences

My submission is the proposed maximum fence heights are too low to provide adequate privacy. The existing rules requiring 50% transparency provide more flexibility whilst still achieving the goal of openness to the street

I seek the following change: revert to current provisions

Seek amendment to 14.5.2.13 and 14.6.2.11 internal storage

My submission is the proposed storage volumes are excessive if bedroom wardrobes and garages cannot be included. The need for storage is acknowledged however as an actual example, a decent hallway cupboard might be 1.5m wide x 0.6m deep x 2.4m high = 2.1m³. The proposed rule would require 3 of these just for a 1 bedroom unit. Or 4 or 5 of these equivalent cupboards for a 2 bed or 3 bed unit. For higher density units there is typically minimal hallway to be able to locate storage outside of the excluded spaces. No issue having a rule but the requirements are too high.

I seek the following change: reduce storage volumes and/or allow bedroom & garage storage to be included

Seek amendment to 14.6.2.1.b minimum height

My submission is it is possible to have a 2 storey building less than 7m eg a flat roof or low pitch roof. If the intent is that 2 storey housing is mandatory in the high density zone then make the rule that you must build 2 storey rather than a minimum height.

I seek the following change: change height limit to minimum 2 storey

Seek amendment to 14.16.2 recession planes

My submission is the recession plane angles should be higher in the high density residential zones. Also recommend reinstating the previous exclusion allowing gutters to protrude up to 200mm in height. Also recommend reinstating the exclusions for chimneys, spires, aerials etc. These exclusions do not have a significant impact on shading. The provisions for measuring the recession plane at the midpoint of walls and roofs which was applicable to the residential hills zone has been removed, this is potentially an error as 14.7.2.4.b still refers to this method.


I seek the following change: increase recession planes in high density zone. Reinstate previous exclusions.

Our proposed Housing and Business Choice Plan Change (14)

[Submitter Details](#)**Submission Date:** 26/04/2023**First name:** Mike**Last name:** Currie**Preferred method of contact** Email

Attached Documents

Name

Proposed MDRS Shading Effects - 32 Howe St New Brighton 

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 26/04/2023

First name: Mike

Last name: Currie

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Seek Amendment

I seek the following decision from the Council

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

In order to ensure provision for sunlight access at all levels of a building the current District Plan Southern boundary angle of 33 degrees from a height of 2.3m at the boundary must be retained along with a building height restriction of 8m. If the building height restriction is increased to 12m, then the Southern boundary angle must be decreased to 29 degrees. Similarly, if the reference height at the boundary is increased, the Southern boundary angle must be decreased accordingly to give the same sunlight access as provided for above.

My submission is that:

My submission is in relation to the Sunlight Access Qualifying Matter and I do not agree with the proposed amendments to the MDRS. The Plan Change 14 amendment states that 'The Sunlight Access Qualifying Matter proposes to modify this approach to better reflect Christchurch' specific latitude and climate. It ensures a more equitable outcome across Tier 1 councils, providing for sunlight access at all levels of a building, increasing sun exposure, whilst better protecting and enhancing property values.'

I have done an analysis of the affects on sunlight access on my own property at 32 Howe Street, New Brighton as proposed by the CCC proposed amendments to the MDRS and advise that they do not provide for sunlight access at all levels of the building. Please refer to the attached file 'Proposed MDRS Shading Effects - 32 Howe St New Brighton'. This gives a comparison of shading effects of the MDRS and the proposed CCC amendments to the MDRS to the current District Plan recession planes and building height restriction. This also takes into account the effect on solar panels.

My findings are:

Current District Plan

- Partial sun to ground floor for 1 month, full sun for remainder of year
- Year round sun to solar panels

MDRS

- No sun to ground floor for 5 months, partial sun for 2 months
- No sun to solar panels for 5 months

Proposed Sunlight Access Qualifying Matter (CCC)

- No sun to ground floor for 5 months

- No sun to solar panels for 3 months

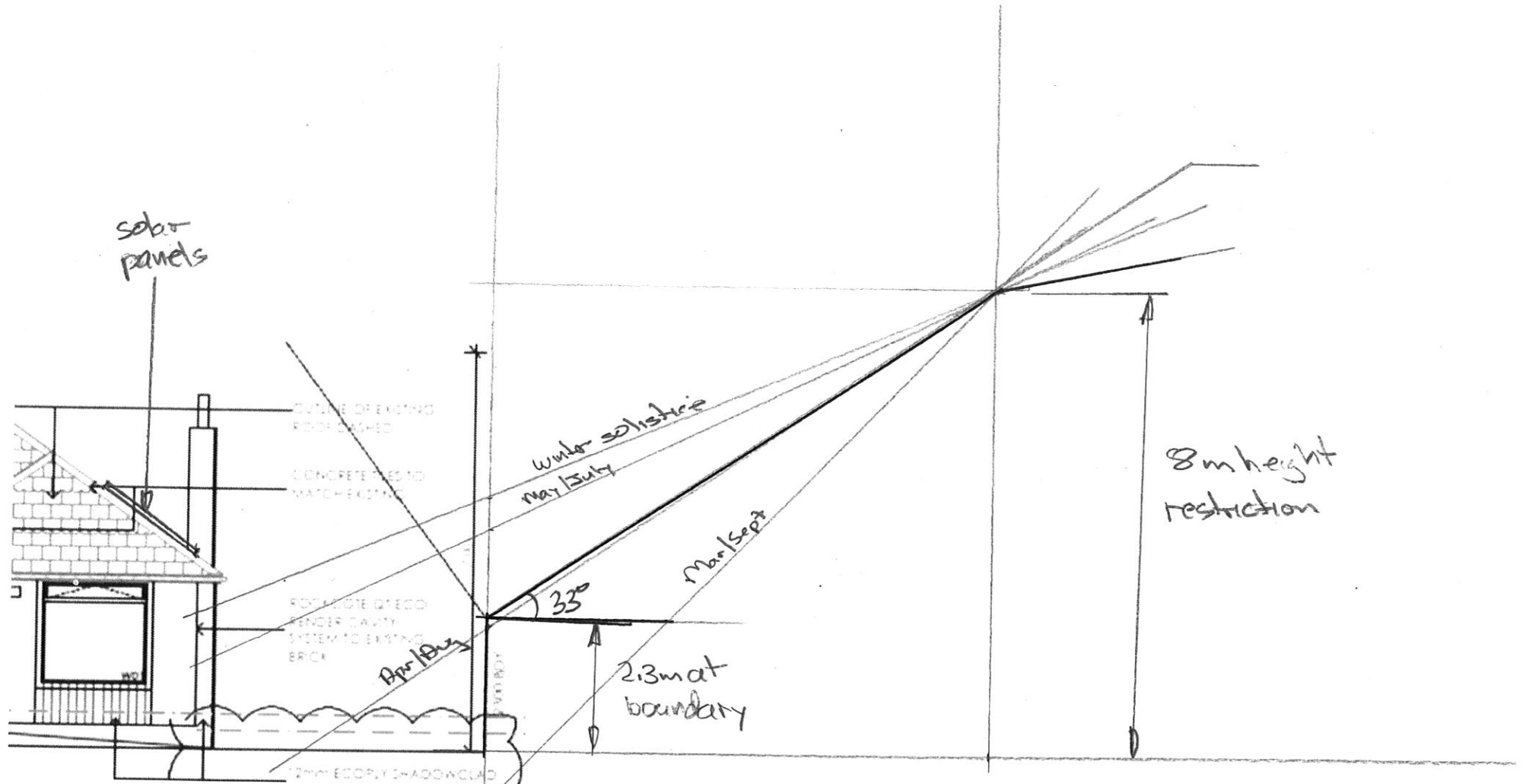
The overriding conclusion from this analysis is that the proposed CCC amendments to the MDRS do not provide for sunlight access at all levels of the building. Furthermore, there is no sun to the solar panels for 3 months. Many people have invested in solar panels and they will not be happy to lose 3 months use, even in winter.

Attached Documents

Name
Proposed MDRS Shading Effects - 32 Howe St New Brighton

Conclusion

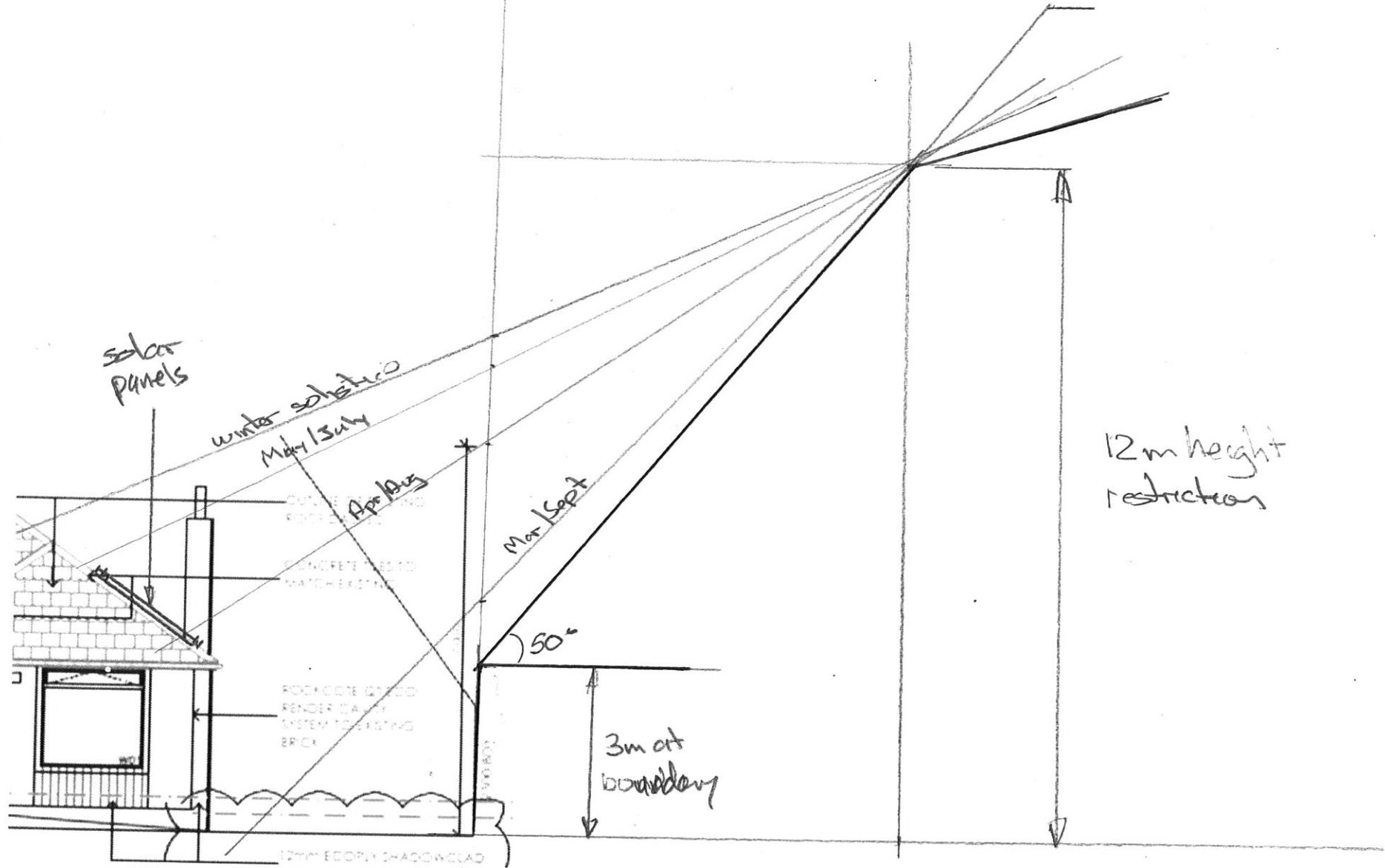
Partial Sun For 1 month to ground floor
Year round sun to solar panels



Current Situation
32 Howe St New Brighton

Conclusion

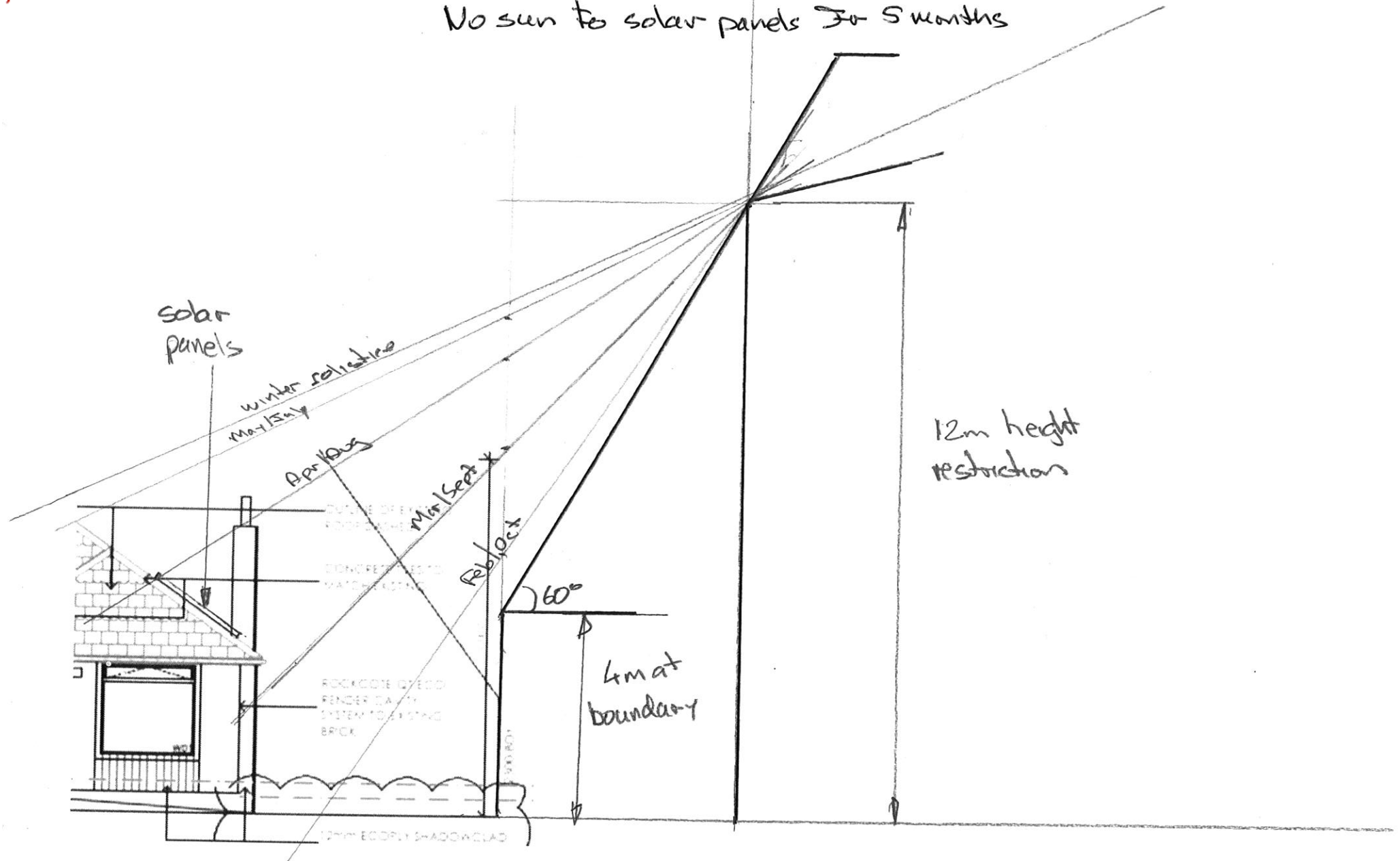
No sun to ground floor for 5 months
No sun to solar panels for 3 months



Proposed Sunlight Access Qualifying Matter (CCQ)
32 Howe St New Brighton

Conclusion

No sun to ground floor for 5 months, partial sun for 2 months
 No sun to solar panels for 5 months

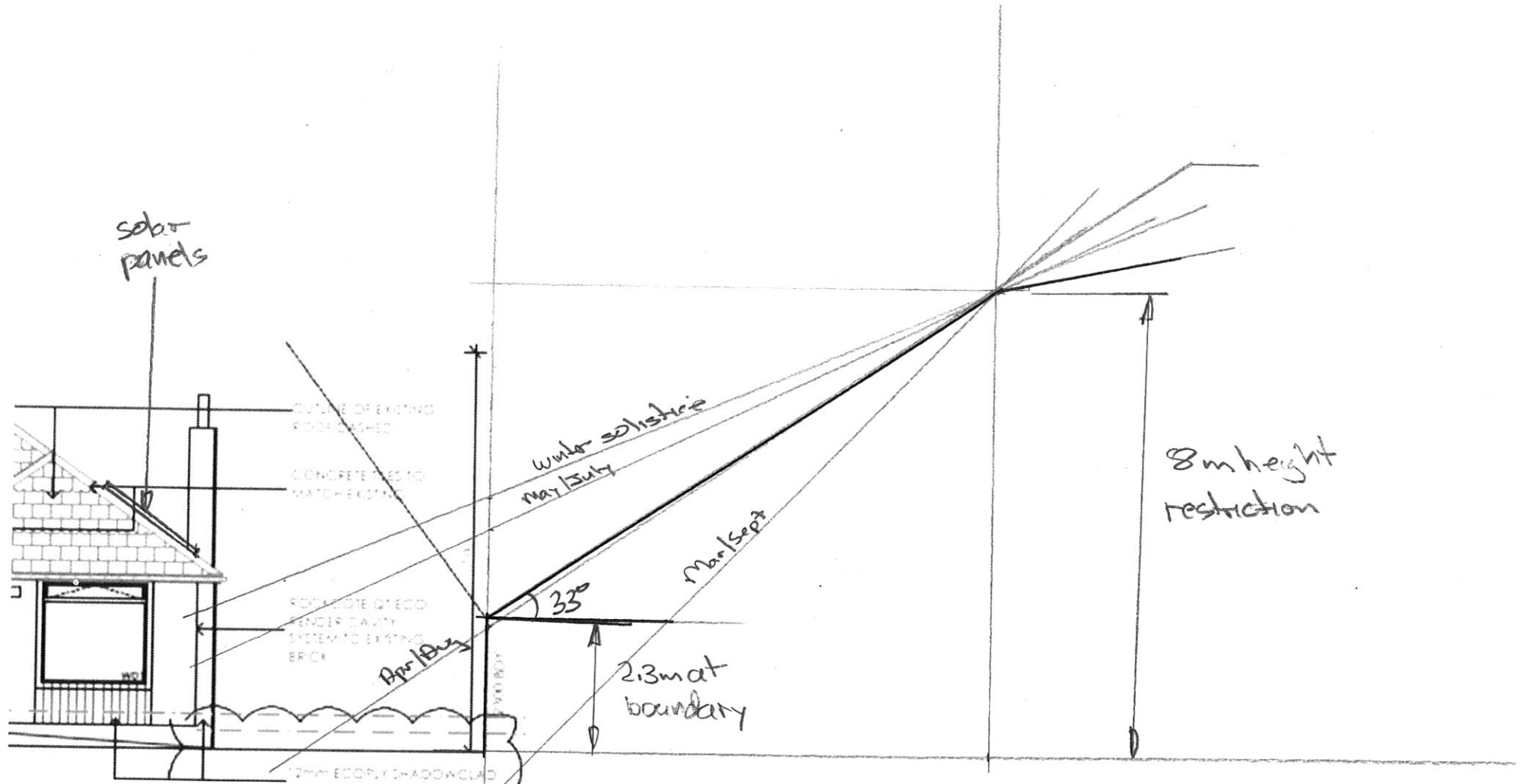


Proposed MDRS (RMA amendment)

32 Howe St New Brighton

Conclusion

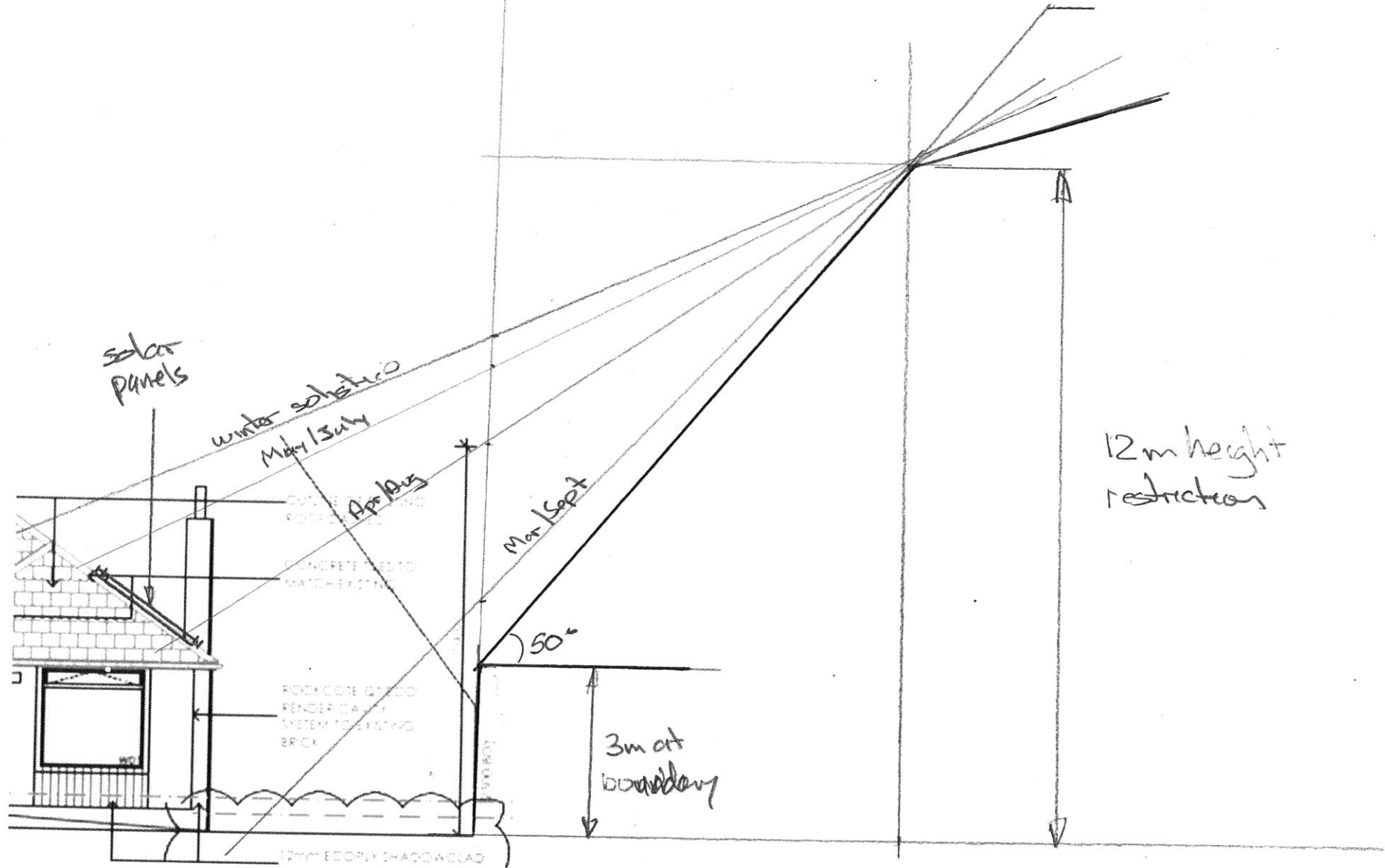
Partial Sun For 1 month to ground floor
Year round sun to solar panels



Current Situation
32 Howe St New Brighton

Conclusion

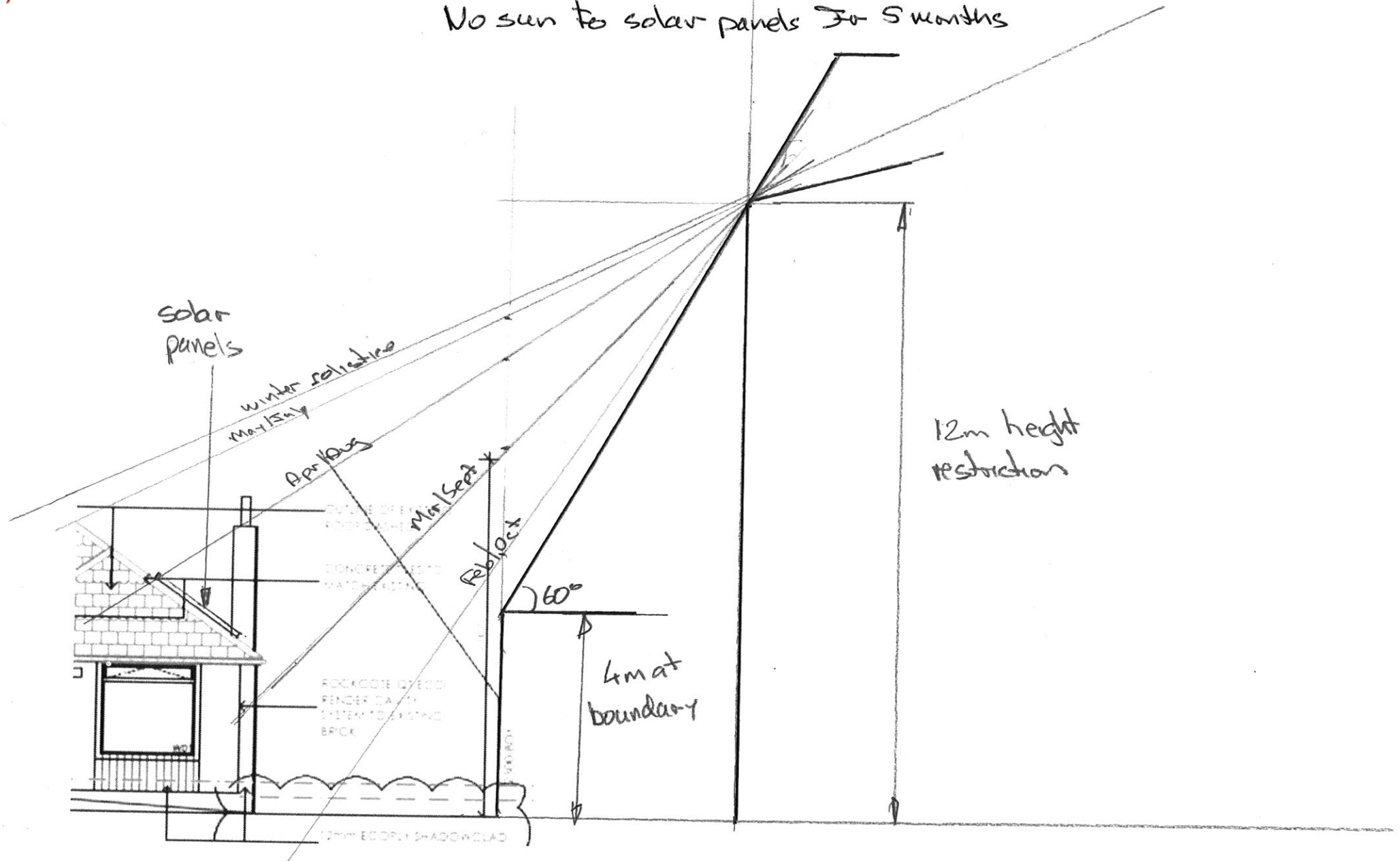
No sun to ground Floor for 5 months
No sun to solar panels for 3 months



Proposed Sunlight Access Qualifying Matter (CCQ)
32 Howe St New Brighton

Conclusion

No sun to ground floor for 5 months, partial sun for 2 months
 No sun to solar panels for 5 months



Proposed MDRS (RMA amendment)

32 Howe St New Brighton

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 27/04/2023

First name: Guy

Last name: Mortlock

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Oppose

I seek the following decision from the Council

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

The block bounded by Creyke Road, Ilam Road, Wilfrid Street and Barlow Street should be zoned either MRZ or RSDT

My submission is that:

The Airport Noise qualifying matter is being given too much emphasis with the result that areas of Christchurch that should be available for higher density housing are inappropriately being excluded from such development. In particular the block bounded by Creyke Road, Ilam Road, Wilfrid Street and Barlow Street should be zoned either MRZ or RSDT. I work in an office on the corner of Ilam Road and Creyke Road and hardly ever hear airplanes. I also live in a property closer to the airport (on the boundary of the noise qualifying matter) and hardly ever hear airplanes - which suggests that the boundary is unnecessarily conservative. There is steady demand for all the rentals in this area (not only from University students but also University employees and visitors) and re-development with higher density would help fill that demand. I note that Ilam Road is going to have its speed limit reduced and cycle lanes installed making it a more pleasant residential area - so it makes sense to have as many people living in this area as possible (rather than living further away and having to commute to the University). Airplanes are getting quieter over time - but the airport noise zones are not getting smaller.

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 27/04/2023

First name: Joanne

Last name: Knudsen

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 6 General Rules and Procedures

Support

I seek the following decision from the Council

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

To make Bewdley Street and Evesham Crescent along with Roker and Ryan Streets Character Areas.

To have in the district Plan re retaining tree canopy at least 25% tree canopy for new developments.

To modify the sunlight access qualifying matter to accommodate Christchurch's colder climate and less daylight hours.

My submission is that:

I support that Bewdley and Evesham Crescent be a Residential Character area and agree that any subdividing be more restrictive. Definitely keeping the same set back from the street to keep with the character area ie at least 3-4 metres. I agree a resource consent with neighbour notification for these areas. I agree the larger gardens and existing trees be retained - unless a health and safety hazard due to a weather event.

I agree the sunlight access needs to be modified for Christchurch so all floor levels have sunlight access to allow for sun exposure on all floor levels.

I agree and was surprised that until now there was nothing in the District Plan retaining our tree canopy. We are known all around the world as the Garden City and we don't want to be losing anymore canopy.

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 28/04/2023

First name: Andrew

Last name: McNaught

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Oppose

I seek the following decision from the Council

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

Completely redraft the submission because it is plainly ridiculous

My submission is that:

Your suggestion that 4 storey buildings are acceptable in the area that I live is just laughable. The majority of homes are single level and there will be no privacy for the neighbors and will stick out like a sore thumb.

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 28/04/2023

First name: Keith

Last name: Shaw

Preferred method of contact Email

Consultation Document Submissions

Provision: Planning Maps

Support

I seek the following decision from the Council

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

23 Birdwood Avenue, Beckenham

My submission is that:

I support retaining the Qualifying Matters in Plan Change 14 as it affects my property at 23 Birdwood Avenue, Beckenham

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 28/04/2023

First name: Alana

Last name: Harper

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Seek Amendment

I seek the following decision from the Council

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

Cashmere Estate in Cracroft should stay zoned as it is or go to Future Urban Zone. Cashmere Hills should all stay as Residential Hills Zone.

My submission is that:

The areas that are being expanded to include MDRZ housing should not include areas such as residential hills and newly developed areas such as large scale subdivisions that were originally zoned as res suburban. There are plenty of areas changing to MDRZ that are closer to the city, on flat land and in older suburbs that are ready for the dwellings to be replaced. In our area (Cashmere Estate) there are great views around and up to the hills. Its going to look very odd having a scattering of 3 storey multi unit dwellings in between these, especially where the land area is small. For the residential hills zoned areas people have purchased on the hills to get a view and if its changed to MDRZ then over time these views will be lost. The look of the port hills covered in multistorey and multi unit dwellings would change the look of our city in a bad way. The greenery would be lost and this could be seen from across the whole city.

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 28/04/2023

First name: Susanne

Last name: Trim

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Support

I seek the following decision from the Council

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

My submission is that:

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

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

In terms of the increased heritage coverage, I support most of the proposed areas except Heaton St. There has been so much change down that road already I think it would be a waste of time. Personally, I think streets such as Mary and Rayburn Streets probably show off that mid 20th century suburban architecture more appropriately.

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

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 28/04/2023

First name: Richard

Last name: Bigsby

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Oppose

I seek the following decision from the Council

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

The submitter seeks that Clause C of 14.5.2.4 is deleted in entirety.

~~andnbsp;Eaves and roof overhangs up to 300mm in width and guttering up to 200mm in width from the wall of a building shall not be included in the building coverage calculation.~~

My submission is that:

The submitter opposes standard 14.5.2.4 - Site coverage. Clause C 'Eaves and roof overhangs up to 300mm in width and guttering up to 200mm in width from the wall of a building shall not be included in the building coverage calculation'. This clause is inconsistent with the National Planning Standard definitions of 'building coverage' and 'building footprint'.

The clause has the potential to cause confusion for users/practitioners using District Plans that will give effect to theandnbsp;National Planning Standards.

Provision: Chapter 14 Residential

Seek Amendment

I seek the following decision from the Council

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

It is recommended that the standard include a clarifying note within the table to confirm if there is no rear boundary setback that applies to corner sites.

My submission is that:

The submitter opposes 14.5.2.7 - minimum building setbacks, Clause a, i. The building setback standard for rear boundaries on corner sites is unclear and difficult to interpret. This may have significant implications for site re-development and preparation of building plans.

Provision: Chapter 14 Residential

Seek Amendment

I seek the following decision from the Council

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

The submitter seeks that the provision is amended to allow for a fence of a greater height as a permitted activity, provided that visual transparency/interaction/engagement with the street is still achieved. Further, the provision makes no concession for corner allotments, where sites have greater lengths of frontage. The fencing provisions need to allow for a solid section of 1.8m tall fencing to be established to provide visual and acoustic privacy to living areas.

It is recommended that the existing fencing provisions are retained.

My submission is that:

The submitter opposes standard 14.5.2.9 - street scene amenity and safety - fences, clause a, i. The 1.5m & 1m height combination for a non-arterial road as notified is inadequate for children, pets, security etc, particularly for corner allotments.

The submitter also acknowledges that the proposed provision will affect existing residential properties (i.e. with appreciable lengths of road frontage) and not just sites that are subject to infill development. 1.5m is considered inadequate for visual & acoustic privacy from the public realm, particularly for corner allotments (i.e. on the southern side of the street).

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 28/04/2023

First name: Dr Lynette

Last name: Hardie Wills

Organisation:

Ilam and Upper Riccarton Residents' Association, Inc.,

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 6 General Rules and Procedures

Oppose

I seek the following decision from the Council

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

1. It is for this reason that we ask that Bush Inn which is the smaller commercial centre in size be excluded from adherence to any new Building Intensification which involves the new building heights to six storey buildings with no car parks.
2. Ilam and Upper Riccarton Residents' Association, Inc., includes a very large educational zone and such proposals and developments are clearly not suitable to this area.
3. The Ilam and Upper Riccarton Resident's Association, Inc., wishes to speak at any hearing concerning the Changes re Building Intensification and Car-Parking in our area.
4. Mental Health concerns have the IURRA's highest priority.
5. We also wish for the Ilam and Upper Riccarton Residents' Assoc. (IURRA, Inc.,) to speak at any Hearings concerning these matters

My submission is that:

I wish it to be noted that the **Ilam and Upper Riccarton Residents' Association, Inc.,** strongly objects to the present plans for greater Building Intensification in the BUSH INN Shopping and Commercial Centre in Upper Riccarton.

1. The residents' boundaries for the members of the Ilam and Upper Riccarton Residents' Association, Inc., are all on the northern side of Riccarton Road.
2. The IURRA understands the Residential Suburban Density Transitional RSDT that relates to medium density and Residential Suburban {Low density}. The IURRA, Inc., do not think it acceptable to go beyond medium density!
3. The IURRA area is densely populated with joined housing. Older people live individually or in couples in these units. There are no complaints regarding the current density.
4. Why would Central Government wish to impose high density on these residents, affecting their community and potentially forcing them to move away from the IURRA area?
5. We note that presently Riccarton Commercial & Shopping Centre and the Bush Inn Commercial & Shopping Centre are very close together.

We understand that nowhere else in New Zealand are two shopping centres located so near to each other.

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 28/04/2023

First name: Steven & Diana

Last name: Marshall

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Oppose

I seek the following decision from the Council

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

Helmores Lane/ Desmond Street/ Rhodes St (from Helmores to Rossall)

That the proposed unnecessary high density zoning be dumped!! Medium density could be acceptable if the Council enforces rules to maintain the character of the area.

My submission is that:

Helmores/ Desmond/Rhodes precinct

We live at 11 Desmond Street, and have happily done so for almost 26 years.

We chose this area for its quiet family-friendly atmosphere with all homes being on full sections, and its quiet residential nature made even more appealing since the closure to vehicles of the Helmores Lane bridge post the earthquakes.

We are horrified that PC 14 could allow much higher density development, tower blocks,, increased traffic, more competition for parking (already at a premium due to Hagley Park walkers, and yes commuters, leaving their vehicles for long periods of time); such a change would irreparably change the whole atmosphere of this special part of the city.

Allowing intensive development will be the death knell for the few remaining character houses in the Helmores/Desmond/Rhodes precinct, - those very character houses which have contributed to the very marketable garden city image which all of Christchurch proudly proclaims. Why would the council wish to destroy that diminishing heritage?

The Council must surely be aware of the huge numbers of residential units unsold in the CBD with many more either planned or already under construction.

This precinct is definitely not suitable for high density zoning.

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 28/04/2023

First name: Sharina

Last name: Van Landuyt

Preferred method of contact Postal

Consultation Document Submissions

Provision: Chapter 14 Residential

Seek Amendment

I seek the following decision from the Council

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

I SUPPORT RYAN STREET BEING DESIGNATED AS A RESIDENTIAL CHARACTER STREET. We have a beautiful street with nearly every house being a character bungalow and feel it is incredibly special to Christchurch.

My submission is that:

I OPPOSE Ryan Street being designated as a medium density residential zone. We have a beautiful street filled with character bungalows and want to keep it that way!!!!

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 29/04/2023

First name: Michael

Last name: Down

Preferred method of contact Postal

Consultation Document Submissions

Provision: Chapter 14 Residential

Support

I seek the following decision from the Council

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

I wish to see Evesham Crescent and Bewdley Street made a Residential Character Area under Plan Change 14.

My submission is that:

I'm a resident on Evesham Crescent and I welcome the proposed designation of my area as being a 'Residential Character Area'. Whilst I'm not against development, I'd love to ensure this is done in a way that maintains the special character of my street.

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 28/04/2023

First name: Rhys

Last name: Davidson

Preferred method of contact Postal

Consultation Document Submissions

Provision: Chapter 14 Residential

Seek Amendment

I seek the following decision from the Council

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

I SUPPORT RYAN STREET BEING DESIGNATED AS A CHARACTER STREET.

My submission is that:

I OPPOSE Ryan Street being designated as a medium density residential zone!!

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 05/05/2023

First name: Shona

Last name: Willis

Organisation: The Riccarton Bush Trust

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Seek Amendment

I seek the following decision from the Council

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

That the changes under PC14 for the protection of Pūtaringamotu are made, including:

- a. the introduction of the Riccarton Bush Interface Area:
- b. the imposition of a 8m height limit (within the interface area)
- c. retention of the 35% site coverage rule for the RS zone (within the interface area)

My submission is that:

That the changes under PC14 for the protection of Pūtaringamotu are made, including:

- a. the introduction of the Riccarton Bush Interface Area:
- b. the imposition of a 8m height limit (within the interface area)
- c. retention of the 35% site coverage rule for the RS zone (within the interface area)

Provision: Chapter 9 Natural and Cultural Heritage

Seek Amendment

I seek the following decision from the Council

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

That the error identified in the Board's submission is corrected, in favour of the status quo. That is, the re-insertion of the 10m buffer, measured from the foot of the predator proof fence and subject to the existing exceptions.

That provision be made for the notification to the Board (at least) of resource consents for non-compliance with the above standards and the matters of discretion at 9.4.6 (l).

Any further or other relief that enhances the protection of Pūtarīngamotu, or that is required as a consequence of the relief sought.

My submission is that:

There appears to be an inadvertent error in the rules at **9.4 Significant and Other Trees**. The Board believes the discretionary protections also maintained from the current Plan settings, would be strengthened by enabling the Board's input on resource consent applications within the interface area. Meaning that the Board should be notified when resource consents are applied for in this area.

The apparent error

The amendments proposed to the District Plan at 9.4.4.1 include the introduction of a tree protection zone based on individual trees. This is an unnecessary change to the status quo, introduced under Plan Change 44 (PC44) to remove the very issue that the current amendment will re-introduce. Namely that tree protection based on buffer of (at least 10m) from the base of the predator proof fence that indicated the "significant tree area" is superior as it protects all the trees within the area including saplings and other smaller (or thinner) trees.

In contrast PC14 has introduced the 'Tree protection zone radius' which is defined as meaning:

...the protection area around a scheduled tree, which is equivalent to 15 times the trunk diameter at 1.4m, where activities and development are managed to prevent damage to a scheduled tree. The maximum extent of a tree protection zone radius is restricted to 15m.

The rationale for the change is that:

- Existing rules refer to works within the first 10 metres of the base of any tree within the Riccarton Bush Significant Tree area. However, instead of an arbitrary 10m, PC14 has introduced the above concept to ensure that the setback is relative to the scale of trees – up to a maximum of 15m.

As noted above, the 10m distance was not arbitrary but deliberate. It was chosen for a purpose. It was also arrived at in the course of PC44, and agreed to by neighbours involved in that process.

Further enquiries with CCC indicated that this appeared to be an administrative error and CCC staff are aware of the unworkability of the changes. The officer contacted by the Board commented:

"I have enquired further about this rule to better understand its genesis and reasoning. The phrasing proposed for RD6 appears to have been an oversight, for the simple reason that there is no ability to measure a tree trunk when the rule specifies that the trunk is the predator-proof fence. The original rule deliberately used the predator-proof fence as the base for measurement to make the measurement easier and uniform, and apply to mature trees as well as saplings that, without disturbance or damage will eventually grow and mature contributing to the sustainability of Putarīngamotu. Another reason for using the predator-proof fence as a "base of a tree" within the old City Plan rules was that Riccarton Bush is logically treated as one entity, rather than a collection of individual trees within, and is shown as such on the maps.

In this respect, a more appropriate control may simply be retaining the current controls due to the unique circumstances under which the Bush is protected in the Plan. I would encourage you to make a submission on this particular part of the proposal."

This submission is therefore made requesting that the status quo be restored in relation to the buffer area.

Further concern

Of further and particular concern to the Board is 9.4.4.1.3 RD6 that details:

Any application for this activity shall not be limited or publicly notified.

Consequently, there is no ability for a resource consent application to be notified to potentially affected parties and Council would apply *its* discretion to consider the effects associated with such an application. The Board, particularly given its statutory role in protecting the Bush, believes this is provision inadequate.

It means that the Board would not have the ability to formally comment on or have input regarding the listed matters of discretion, which remain as follows:

9.4.6 Rules – Matters of discretion

...

Riccarton Bush

I. For the lowland kahikatea forest remnant at 16 Kahu Road, which forms part of the greater Riccarton Bush and House Reserve, and is defined by a 'Protected Trees Area' symbol identified as a 'Significant Trees Area' on Planning Map 38B, the Council shall additionally have regard to the following matters:

- i. The effects of any building, including the type of foundation used, and/or shading by the building on the existing trees and the supporting ecosystem of the forest remnant, including the juvenile regenerating trees;
- ii. The effects of any works on the extensive surface and sub-surface root systems of the kahikatea trees; 20
- iii. The effects of any impervious surfaces on the health and viability of the trees and the supporting ecosystem including soil aeration and hydrological balance; and
- iv. Whether constructing a building in close proximity to the forest remnant is likely to give rise to reverse sensitivity regarding shading, branch overhang, encroaching tree roots or windthrow;

So, while there are no planned changes to these matters under PC 14 it remains uncertain as to how the regard to be had to them is managed. This includes who determines the impact and how, or whether, the Board can provide any feedback.

The Board considers that even if wider notification of resource consent applications within the Riccarton Bush Interface is not to occur (including further limited notification), the proper management of the matters of discretion should involve notification on the Board. This does not mean that the Board will need to be involved in every resource consent application, especially if the effects (if any) on Pūtarangamotu are negligible. But the Board should be made aware and given the option of submitting any concerns where necessary.

Attached Documents

Name
RBT Submission PC 14 40522



RICCARTON HOUSE & BUSH PŪTARINGAMOTU

16 Kahu Road
P O Box 8276
CHRISTCHURCH 8440

Phone: 03 341 1018

www.riccartonhouse.co.nz

"But do those to whom it belongs- not the people of the district alone but all New Zealanders- recognise how beyond price is this piece of ancient forest. Do they understand it is the last tree-association of the kind in the whole world. Do they know if destroyed it can never be replaced....."

Dr Leonard Cockayne 1906

The Riccarton Bush Act 1914 details that the Mayor of Christchurch accepted the gift of Riccarton Bush to the people of Canterbury, with inter alia, the condition that the said property shall be used and kept for all time for the preservation and cultivation of trees and plants indigenous to New Zealand.

There is simply no other similar combination of indigenous trees and shrubs on the face of the earth; let alone anything similar in New Zealand. It is the largest remnant of alluvial podocarp forest on the lower Canterbury Plains and Banks Peninsula, a forest type that today only covers a tiny fraction of its former extent. It is a key mahinga kai site for Ngāi Tūāhuriri, and the place of first permanent European settlement in Ōtautahi. The Riccarton Bush Board was established in 1914 and one of its key roles is to *Protect and enhance the indigenous flora, fauna and ecology of Pūtaringamotu /Riccarton Bush, including mahinga kai and taonga species.*

Pūtaringamotu/Riccarton Bush has exceptionally high ecological and cultural values that housing intensification has the likelihood to adversely impact. These values are clearly recognised through the site being protected by its own Act of Parliament, the site meeting Section 6(b), 6(c) and 6(e) criteria in the RMA and by the site being mapped as a Site of Ecological Significance in the Christchurch District Plan.

The Riccarton Bush Trust (**Board**) acknowledges the work that the Council has done on proposing a Riccarton Bush Protection Zone that covers approximately 180 properties surrounding the Riccarton Bush Property. The Council commissioned reports from Manu Whenua and from Heritage Landscape expert, Dr Wendy Hodinott to inform its decision. It is disappointing that no consideration was given to any report on the impact of intensification on the health and longevity of the Bush, which is of great concern to the Board.

While any housing intensification will not take place within Pūtaringamotu, the scale and extent of such intensification, in such close proximity, continues to raise the following concerns:

- 1.1 *Ground disturbance associated with building adjacent to Pūtaringamotu.* Construction of buildings will require foundations which have the potential to impact Pūtaringamotu by:
- a) Affecting mature tree root systems, both structurally and in terms of the volume of soil from which they are able to absorb nutrients and water, leading to tree ill-health and potentially dieback in Pūtaringamotu.
 - b) Affecting soil hydrology and particularly the lateral movement of water through the soil, which will lead to reduced water available for native vegetation within Pūtaringamotu.
- 1.2 *Loss of greenspace adjacent to Pūtaringamotu through increasing site coverage and reducing the minimum site size.* With intensification it is proposed to increase site coverage from a maximum of 35% to 50% (in the MRZ), and to reduce minimum lots sizes from 450 m² to 400 m². In addition, the intensification rules suggest that the area of green space only needs to be 20% of the site. In total this will have adverse impacts on Pūtaringamotu including in the following ways:
- a) It will reduce the amount of habitat (especially trees) for native fauna, especially as corridors for bird movement. This will have significant impacts on mobile fauna such as kereru, korimako and tui which require areas larger than Pūtaringamotu for viable populations.
 - b) Further affect soil hydrology by reducing the amount of soft/green permeable surfaces through which rainfall can percolate into the ground, with a much greater area of water being lost via hard surfaces into the storm water system. This will lead to reduced water available for native vegetation within Pūtaringamotu.
- 1.3 *Increased intensification adjacent to Pūtaringamotu altering local microclimates.* This will have direct impacts on the vegetation and hence habitat quality for fauna proportional to the height of structures by:
- a) Shading parts of the bush, thereby reducing photosynthesis.
 - b) Creating potentially strong wind funnelling effects that can cause increased transpiration from foliage and potentially cause physical damage.
 - c) Leading to increased air temperatures due to urban heat island effects. This again can affect plant photosynthesis and respiration in the bush.
 - d) Increased light pollution from taller buildings impacting bird, gecko and insect behaviour within the bush.
- 1.4 *Reverse sensitivity effects towards Pūtaringamotu.* Caused by people living close to the bush perceiving the bush as having adverse effects on them resulting in:
- a) Residents placing pressure on the Council to have trees trimmed, thinned or even removed because they cast shade on their apartments, thus reducing the values of Pūtaringamotu.
 - b) Residents placing pressure on the Council to prune roots or have trees removed for their perceived or actual damage to infrastructure (below ground utilities, paved areas, fence and building foundations).

The Board is laser focussed on the health and longevity of the Bush. It is why the Board exists. Its management practices and plans for the future **begin** and **end** with protecting and enhancing the indigenous flora, fauna and ecology of the Bush.

The Board remains concerned that the significance and importance of Pūtaringamotu/Riccarton Bush is still not being sufficiently considered under the proposed plan change leading to a gradual and inevitable diminution of the values of the bush.

Therefore, as part of the relief sought, the Board requests that prior to any decisions being made on housing intensification resource consent applications within the proposed Riccarton Bush interface, that (a) the Board be notified (see below) and (b) the Council ensures evidence is provided that the increased intensification proposed will have no detrimental impact on Riccarton Bush. If that is unable to be shown, there is clearly a breach of the undertaking of the Mayor of Christchurch in accepting the gifting of the Bush as enshrined in the Riccarton Bush Act 1914, that Riccarton Bush will be kept for all time for the preservation and cultivation of trees and plants indigenous to New Zealand.

Pūtaringamotu is a taonga for Mana Whenua and the people of Canterbury and is simply too unique and fragile to authorise adjacent intensification without robust evidence.

Current District Plan protection for Pūtaringamotu

The existing District Plan zones Pūtaringamotu *open space – natural* which recognises (if only partially in the Board's view) its importance. However, the tangible protections for Pūtaringamotu, in respect of development on surrounding properties, are relatively limited. They consist of a requirement for resource consent for earthworks within an effective buffer area of 10m, as follows:

Rule 9.4.4.1.3

Restricted Discretionary Activities

RD6

- a. Any of the following within 10 metres of the base of any tree in the Significant Trees area at Riccarton Bush:
 - i) works (including earthworks, other than as provided for by Rule 9.4.4.1.1 P12);
 - ii) vehicular traffic;
 - iii) sealing or paving (excluding earthworks);
 - iv) storage of materials, vehicles, plant or equipment; or
 - v) the release, injection or placement of chemicals or toxic substances.
- b. In the case of the property at 48 Rata Street (legally described as Lot 375 DP 11261) the 10 metre restriction shall only apply to the northern boundary of that property.
- c. For the purposes of this rule, the outer boundary defining the Significant Trees Area (*which follows the predator-proof fence surrounding the forest remnant*) shall be deemed to be the base of the tree.
- d. Any application arising from this rule shall not be limited or publicly notified

[underlining in original, *italics* added]

The Council's discretion is then restricted to the matters in Rule 9.4.6 a – o.

Relevantly, in addition to the matters that the Council must generally have regard to when considering restricted discretionary applications relating to significant trees, the following (matter “I”) have also applied specifically in respect of Pūtaringamotu:

Riccarton Bush

- I. For the lowland kahikatea forest remnant at 16 Kahu Road, which forms part of the greater Riccarton Bush and House Reserve, and is defined by a ‘Protected Trees Area’ symbol identified as a ‘Significant Trees Area’ on Planning Map 38B, the Council shall additionally have regard to the following matters:
 - i) The *effects of any building*, including the type of foundation used, and/or shading by the building on the existing trees and the supporting ecosystem of the forest remnant, including the juvenile regenerating trees;
 - ii) The *effects of any works* on the extensive surface and sub-surface root systems of the kahikatea trees;
 - iii) The effects of any impervious surfaces on the health and viability of the trees and the supporting ecosystem including soil aeration and hydrological balance; and
 - iv) Whether constructing a building in close proximity to the forest remnant is likely to give rise to reverse sensitivity regarding shading, branch overhang, encroaching tree roots or windthrow;

[underlining in original, *italics* added]

As will be apparent, these matters of discretion, recognised in the District Plan, effectively mirror the concerns that the Board has regarding the enabling of *more* intensive development on properties adjacent to Pūtaringamotu.

Proposed District Plan protection for Pūtaringamotu under PC14

New and Modified Qualifying Matters

In response to the Board’s concerns expressed during the consultation period for PC14 the Council has introduced additional controls to better recognise Putaringamotu, which the Board acknowledges and appreciates.

However, while the creation of the **Riccarton Bush Interface**, which makes the following changes:

14.5.2.3 Medium Density Residential Zone – Building height max 8m (14.5.2.4 site coverage 50%)

14.4.2.3 Residential Suburban Zone – Building height 8m (14.4.2.4 site coverage 35%)

– is welcomed, there does appear to an inadvertent error in the rules at **9.4 Significant and Other Trees** and, as noted above, the Board believes the discretionary protections also maintained from the current Plan settings, would be strengthened by enabling the Board’s input on resource consent applications within the interface area. Meaning that the Board should be notified when resource consents are applied for in this area.

The apparent error

The amendments proposed to the District Plan at 9.4.4.1 include the introduction of a tree protection zone based on individual trees. This is an unnecessary change to the status quo, introduced under Plan Change 44 (PC44) to remove the very issue that the current amendment will re-introduce. Namely that tree protection based on buffer of (at least 10m) from the base of the predator proof fence that indicated the “significant tree area” is superior as it protects all the trees within the area including saplings and other smaller (or thinner) trees.

In contrast PC14 has introduced the ‘Tree protection zone radius’ which is defined as meaning:

...the protection area around a scheduled tree, which is equivalent to 15 times the trunk diameter at 1.4m, where activities and development are managed to prevent damage to a scheduled tree. The maximum extent of a tree protection zone radius is restricted to 15m.

The rationale for the change is that:

- Existing rules refer to works within the first 10 metres of the base of any tree within the Riccarton Bush Significant Tree area. However, instead of an arbitrary 10m, PC14 has introduced the above concept to ensure that the setback is relative to the scale of trees – up to a maximum of 15m.

As noted above, the 10m distance was not arbitrary but deliberate. It was chosen for a purpose. It was also arrived at in the course of PC44, and agreed to by neighbours involved in that process.

Further enquiries with CCC indicated that this appeared to be an administrative error and CCC staff are aware of the unworkability of the changes. The officer contacted by the Board commented:

“I have enquired further about this rule to better understand its genesis and reasoning. The phrasing proposed for RD6 appears to have been an oversight, for the simple reason that there is no ability to measure a tree trunk when the rule specifies that the trunk is the predator-proof fence. The original rule deliberately used the predator-proof fence as the base for measurement to make the measurement easier and uniform, and apply to mature trees as well as saplings that, without disturbance or damage will eventually grow and mature contributing to the sustainability of Putaringamotu. Another reason for using the predator-proof fence as a “base of a tree” within the old City Plan rules was that Riccarton Bush is logically treated as one entity, rather than a collection of individual trees within, and is shown as such on the maps.

In this respect, a more appropriate control may simply be retaining the current controls due to the unique circumstances under which the Bush is protected in the Plan. I would encourage you to make a submission on this particular part of the proposal.”

This submission is therefore made requesting that the status quo be restored in relation to the buffer area.

Further concern

Of further and particular concern to the Board is 9.4.4.1.3 RD6 that details:

Any application for this activity shall not be limited or publicly notified.

Consequently, there is no ability for a resource consent application to be notified to potentially affected parties and Council would apply *its* discretion to consider the effects associated with such an application. The Board, particularly given its statutory role in protecting the Bush, believes this is provision inadequate.

It means that the Board would not have the ability to formally comment on or have input regarding the listed matters of discretion, which remain as follows:

9.4.6 Rules – Matters of discretion

...

Riccarton Bush

- I. For the lowland kahikatea forest remnant at 16 Kahu Road, which forms part of the greater Riccarton Bush and House Reserve, and is defined by a 'Protected Trees Area' symbol identified as a 'Significant Trees Area' on Planning Map 38B, the Council shall additionally have regard to the following matters:
 - i. The effects of any building, including the type of foundation used, and/or shading by the building on the existing trees and the supporting ecosystem of the forest remnant, including the juvenile regenerating trees;
 - ii. The effects of any works on the extensive surface and sub-surface root systems of the kahikatea trees; 20
 - iii. The effects of any impervious surfaces on the health and viability of the trees and the supporting ecosystem including soil aeration and hydrological balance; and
 - iv. Whether constructing a building in close proximity to the forest remnant is likely to give rise to reverse sensitivity regarding shading, branch overhang, encroaching tree roots or windthrow;

So, while there are no planned changes to these matters under PC 14 it remains uncertain as to how the regard to be had to them is managed. This includes who determines the impact and how, or whether, the Board can provide any feedback.

The Board considers that even if wider notification of resource consent applications within the Riccarton Bush Interface is not to occur (including further limited notification), the proper

management of the matters of discretion should involve notification on the Board. This does not mean that the Board will need to be involved in every resource consent application, especially if the effects (if any) on Pūtaringamotu are negligible. But the Board should be made aware and given the option of submitting any concerns where necessary.

Relief sought

The Board seeks:

1. That the changes under PC14 for the protection of Pūtaringamotu are made, including:
 - a. the introduction of the Riccarton Bush Interface Area:
 - b. the imposition of a 8m height limit (within the interface area)
 - c. retention of the 35% site coverage rule for the RS zone (within the interface area)
2. That the error identified in the Board's submission is corrected, in favour of the status quo. That is, the re-insertion of the 10m buffer, measured from the foot of the predator proof fence and subject to the existing exceptions.
3. That provision be made for the notification to the Board (at least) of resource consents for non-compliance with the above standards and the matters of discretion at 9.4.6 (I).
4. Any further or other relief that enhances the protection of Pūtaringamotu, or that is required as a consequence of the relief sought.

Dated: 4 May 2023



On behalf of the Riccarton Bush Trust

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 29/04/2023

First name: Kelvin

Last name: Lynn

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Seek Amendment

I seek the following decision from the Council

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

My submission is that:

How will the proposal to have no parking on major arterial routes such as Papanui Road together work with most high-rise buildings in HDR areas likely to not have garages?

Not everyone is going to want to give up their vehicle just because they are on a transport route.

The proposals for HDR areas will mean that there will be a substantial loss of tree canopy. Trees make places pleasant to live in, cool environments and sequester carbon. The CCC has declared a Climate Crisis. To deal with this we need more rather than fewer trees.

Has there been consideration of the provision of pocket parks in the HDR areas?

We live at the nexus of St Albans, Strowan and Merivale. The proposed new rules would allow new buildings to be up to 14 metres in height, subject to a recession plane. I am concerned that the increased value of such buildings, relative to these existing, will result in the unnecessary demolition of perfectly sound residences.

The sketches in the proposal showing examples of HDR areas are misleading as they relate to a green field development. Can we see what an established central suburb would look like with a significant number of new HDR dwellings?

The proposed sunlight recession planes would result in a quarter to a third of residents in our area, given the average site size, having no winter sun. This together with the high-rise housing will result in a lack of social cohesion and wellbeing.

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 29/04/2023

First name: Rachel

Last name: Best

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 6 General Rules and Procedures

Seek Amendment

I seek the following decision from the Council

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

If this policy proceeds outer Christchurch suburbs should be exempt due to transport congestion causing increased time spent in transit and therefore contributing to air pollution.

My submission is that:

Please do not allow housing rules to cut sunlight from neighbours homes. The amendments do not go far enough to protect this natural resource. Maximising sunlight in a property helps to create a dry warm home that keep residents healthy boosting hauora/well-being. Lack of winter sun will create cold damp homes which are known to have negative health outcomes particularly on children and the vulnerable.

Removing the cheapest natural source of energy from people's property's is detrimental to the planet and people's budgets. A sunny home requires less energy to heat so is more environmentally sustainable. Maximising sun in winter means residents energy costs are minimised.

The ability to grow fruit and vegetables at home helps keep residents costs down and is the most environmentally sustainable way of eating as well as providing residents with the freshest produce.

In order to be environmentally sustainable and to preserve resident's health and well-being we should be doing all we can to maximise sunlight in homes particularly in winter when Christchurch gets very cold.

The inequities in this policy is also something to consider. Those living in older poorer housing are more likely to have developers buy adjacent properties to develop multi-storey housing which will block sunlight from surrounding residents and bring down neighbours property prices substantially without any compensation or ability to object. Where is the fairness in this? Developers should pay fair compensation to effected neighbours if this policy proceeds.

Building medium/high density housing in outer suburbs will only add to congestion on the roads increasing time spent in transit around the city which will add to costs and contribute to air pollution. Inner city suburbs should be the focus for this policy.

There is enough land available in Christchurch to NOT bring in this policy whilst still develop enough housing for a growing population. Urban planners are professionals and should be given the task of planning medium or high density housing in suitable areas where there are not detrimental impacts.

You have the opportunity now to save Christchurch from this shortsighted policy. I believe that most residents have no real idea how this policy will effect them if a developer moved in next door to them. If this policy passes it will be only then that residents will see the negative impacts for themselves, but by that time there will be nothing they can do.

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 29/04/2023

First name: Laura

Last name: Cary

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Oppose

I seek the following decision from the Council

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

My submission is that:

The proposed Plan Change 14 will significantly reduce the amenity values, character and current quality of the current neighbourhood. already a blend of traditional and new homes.

Both MRZ and HRZ do not have a requirement for on-site parking for residents. This will add to the problematic street parking which is already significant due to the increasing students, teachers, visitors and construction workers associated with the expanding St Andrews College, Preparatory School, Pre School, Gymnasium, Sports fields, new Performing Arts building and Chapel. These school facilities are all used well beyond 9:00-3:00 school hours.

Both MRZ and HRZ will contribute to greater traffic congestion, already problematic at the intersections at both ends of Normans Road.

Both MRZ and HRZ will bring increased pressure on the local infrastructure and increased stormwater runoff, adding to the flooding which occurs on College Ave in heavy rain.

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 29/04/2023

First name: Russell

Last name: Vaughan

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Oppose

I seek the following decision from the Council

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

My submission is that:

There is little one can do if 3 houses each with 3 stories overlooks our property and takes our sunlight for up to 5 hours per day in winter. When I drew up plans for our house extensions in the 1980's the roof ridge had to fit into a plane which caused little interferences with neighbours.

In areas like ours in Redwood with mostly single stories the total ambience and streetscape would be destroyed. (keep these for major commercial areas and central city areas.)

The Government is applying a nation-wide regulation, seemingly for Auckland to intensify (which should have been done last century) Consideration should be tweaked for middle and southern South Island cities.

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 27/04/2023

First name: Ryan

Last name: Brosnahan

Organisation: Holly Lea Village Limited

Preferred method of contact Email

Consultation Document Submissions

Provision: Planning Maps

Seek Amendment

I seek the following decision from the Council

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

Amend the Planning Maps to ensure the Water Body Setback Qualifying Matter accurately reflects the current alignment of Fendalton Stream at 123 Fendalton Road.

My submission is that:


See attached submission for full details.

Planning Maps - Water Body Setback Qualifying Matter

Fendalton Stream intersects the site, but the proposed Water Body Setback Qualifying Matter does not reflect the current alignment of the stream. The current alignment is shown (in light grey) on the Planning Maps for PC14 but this does not reflect the qualifying matter.

The submitter therefore seeks that the Planning Maps are amended to ensure the Water Body Setback Qualifying Matter accurately reflects the current alignment of Fendalton Stream.

Attached Documents

Name
Holly Lea Village Submission on PC14 

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 27/04/2023

First name: Ryan

Last name: Brosnahan

Organisation: Holly Lea Village Limited

Preferred method of contact Email

Consultation Document Submissions

Provision: Planning Maps

Seek Amendment

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Holly Lea Village Submission on PC14 

**SUBMISSION ON HOUSING AND BUSINESS CHOICE PLAN CHANGE (PC14) TO THE CHRISTCHURCH DISTRICT
PLAN**

(Clause 6 First Schedule Resource Management Act 1991)

TO: Housing and Business Choice Plan Change
Christchurch District Council
PO Box 90
Rolleston 7643

Submission lodged by email – engagement@ccc.govt.nz

SUBMISSION ON: Housing And Business Choice Plan Change (PC14) to the
Christchurch District Plan

SUBMISSION BY: Holly Lea Village Limited

**TRADE COMPETITION
STATEMENT:** The submitter could not gain an advantage in trade competition
through this submission.

SUBMITTER ADDRESS: Holly Lea Village Limited
c/- Graham Wilkinson
PO Box 3861
Christchurch 3861

Please note the different address for service below.

INTRODUCTION

1. Holly Lea Village Limited lodges a submission on the Housing and Business Choice Plan Change (PC14) to the Christchurch District Plan.
2. Holly Lea Village is an existing retirement village at 123 Fendalton Road (Pt Lot 11 DP 2528, Lots 12,13,14,16 DP 2528, Lot 2 DP 504692, Lot 1 DP 80748, Lot 2 DP 9117) managed by Generus Living Group. The village was originally established in 2004 and provides a range of retirement village living, including a main lodge building and serviced apartments. The village current comprises 66 apartments and a soon-to-open 37 suite Aged Care Facility providing both hospital and memory assistance levels of care. Holly Lea Village Limited is seeking to further develop the site in the immediate future.
3. Various resource consents have been obtained in previous years for the existing Holly Lea Village at the site. Importantly, RMA/2020/2605 approved the realignment of Fendalton Stream as part of a large expansion to the village. The stream realignment has since occurred and differs to the previous alignment

on the site in some sections. This matter is discussed later.

4. The submitter's specific relief sought is contained in **Appendix One** of this submission.

SUBMISSION SUMMARY

5. The Holly Lea Village site is zoned Residential Suburban in the Operative District Plan. Under PC14, the site is to be rezoned to Medium Density Residential. The site is also proposed to be subject to a Water Body Setback and Protected Tree Qualifying Matter.
6. The submitter seeks to resolve a mapping error whereby the actual alignment of Fendalton Stream, which intersects the site, does not match the proposed Water Body Setback Qualifying Matter. As noted earlier, part of Fendalton Stream underwent a realignment on the site as authorised by RMA/2020/2605. That realignment resulted in some areas of the stream remaining open and some piped, and a section of the stream being shifted slightly north-west. The current alignment is accurately recorded on Council's Advanced Three Waters Asset Network Map¹, and is also shown (in light grey) on the Planning Maps for PC14 but not reflective of the qualifying matter (see *Figure 1* below).
7. The submitter therefore seeks that the Planning Maps are amended to ensure the Water Body Setback Qualifying Matter accurately reflects the current alignment of Fendalton Stream.

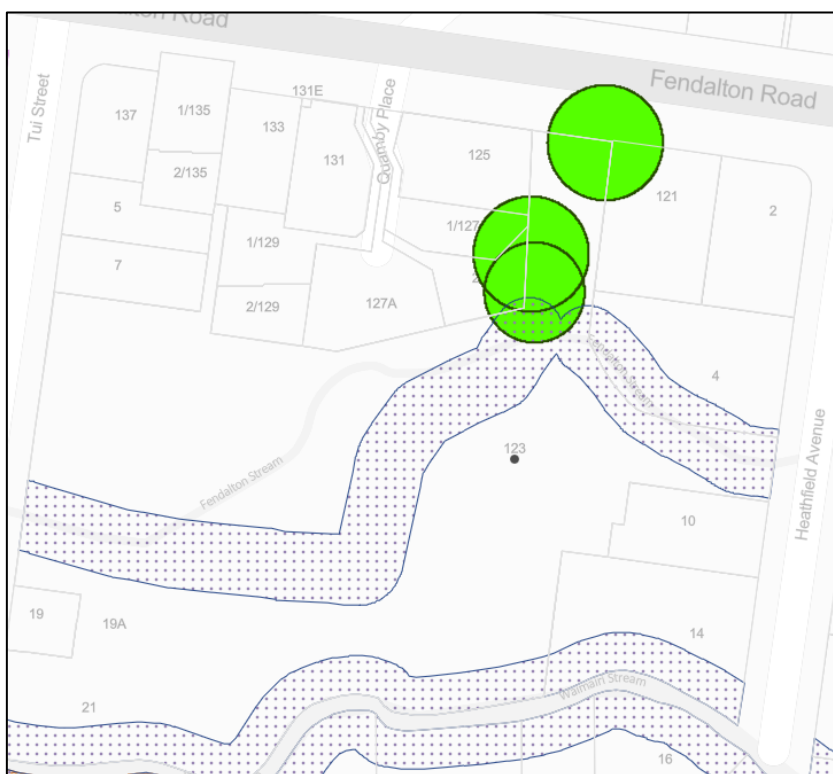


Figure 1: Discrepancy in planning maps between qualifying matter and alignment of Fendalton Stream
(Source: PC14 Planning Maps)

¹ <https://ccc.govt.nz/services/water-and-drainage/three-waters-advanced-asset-network-map>

HEARING

10. The submitter wishes to be heard in support of the submissions.
11. If others make a similar submission, the submitters will consider presenting a joint case with them at the hearing.

Submission signed for and on behalf of Holly Lea Village Limited.



Ryan Brosnahan
Consultant Planner
027 247 0240



Darryl Millar
Director
(03) 962 1740

ryan@rmgroup.co.nz

darryl@rmgroup.co.nz

Resource Management Group Limited
27 April 2023

Address for Service:

Holly Lea Village Limited
C/- Resource Management Group Ltd
PO Box 908, Christchurch Box Lobby
Christchurch 8140

Email: darryl@rmgroup.co.nz

Email: ryan@rmgroup.co.nz

APPENDIX ONE - RELIEF SOUGHT

General Relief Sought

Holly Lea Village Limited seek amendments to the Housing and Business Choice Plan Change (PC14) to the Christchurch District Plan as detailed in the table that follows, and including any additional, alternate and/or consequential amendments to the issues, objectives, policies, rules, maps and other methods required to give effect to the relief sought.

Provision	Submission	Relief Sought
Planning Maps - Water Body Setback Qualifying Matter	<p>Fendalton Stream intersects the site, but the proposed Water Body Setback Qualifying Matter does not reflect the current alignment of the stream. The current alignment is shown (in light grey) on the Planning Maps for PC14 but this does not reflect the qualifying matter.</p> <p>The submitter therefore seeks that the Planning Maps are amended to ensure the Water Body Setback Qualifying Matter accurately reflects the current alignment of Fendalton Stream.</p>	Amend the Planning Maps to ensure the Water Body Setback Qualifying Matter accurately reflects the current alignment of Fendalton Stream at 123 Fendalton Road.

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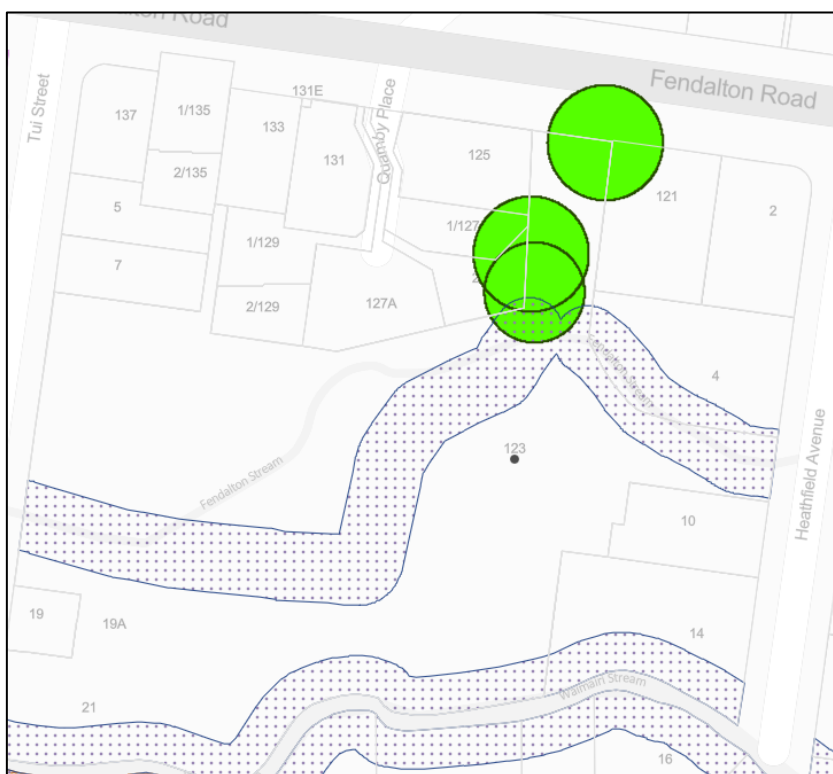


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Ryan Brosnahan
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Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 29/04/2023

First name: Oliver

Last name: Comyn

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 9 Natural and Cultural Heritage

Seek Amendment

I seek the following decision from the Council

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

To include the whole of Ngahere Street in the Riccarton Bush Interface Qualifying Matter

My submission is that:

The whole of Ngahere Street be included in the Riccarton Bush Interface Qualifying Matter.

Appendix 43 to PC14 identifies Riccarton Bush as a site of important landscape heritage and proposes a qualifying matter around it that would limit Medium Density development, thus preserving views of the bush.

However, only the southern side of Ngahere Street (odd numbers) is included in this QM, meaning that MDRS could still be applied to the northern side of the street which would adversely impact views for residents living slightly further north on Kahu Road and Girvan Street.

None of Ngahere Street is suitable for MDRS for the following reasons:

- Parking is at a premium on the street – there are really only spaces for 3 regular sized cars and another 3 or so for smaller cars. These spaces are often filled with people going into Deans Bush or work nearby. There are also some Ngahere St residents who have limited space up their driveways who leave their cars on the road on a semi-permanent basis. This shows that intensification in the street is going to exacerbate the limited parking issue further
- The street is already yellow lined on one side to keep things as safe as possible for the cycleway which goes past our street. Additional density will add to the number of people illegally parking on the yellow lines, causing reduced visibility and possible accidents. This includes tradespeople and courier vans, who are frequently parked on yellow lines already
- Speed is regularly an issue. It is only a 30km/hr zone but this is regularly exceeded because people come down our street on a frequent basis and then turn around and leave, obviously mistaking Ngahere Street for Kahu Road and not realising it is a dead end street
- Surface flooding has been an issue on the street during heavy rain (such as heavy rain experienced in 2022 winter). The end of the street turns into a pond, possibly exacerbated by the gutters which block easily and are the old fashioned deep gutters, and this also means things get blocked underneath the gutter bridges

The 'even' side of Ngahere Street borders the Avon river. Given recent climatic events it seems irresponsible to add density to an area that immediately borders a river, is already designated as a flood zone with TC3 land and has a low water table.

MDRS in Ngahere Street will see increased traffic and population which could have an adverse effect on birdlife supported by Riccarton Bush, especially if further cats move into the street.

Provision: Chapter 7 Transport

Support

I seek the following decision from the Council

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

To approve the Airport Noise Contour Qualifying Matter as shown on the interactive planning map, to include the whole of Ngahere Street within this QM and thus exempt the whole street from MDRS.

My submission is that:

The proposed Airport Noise Contour Qualifying Matter be approved, ensuring that Ngahere Street is included within the boundaries of this QM.

Ngahere Street is a small residential cul-de-sac leading to the heritage landscape area of Putaringamotu/Riccarton Bush.

It suffers from the following problems:

- Limited parking already
- Poor infrastructure: out of date drains, frequently blocked gutters
- Flooding in heavy rain
- Proximity to the Avon River
- It is on the 'Unicycle' cycle route so has heavy cycle and pedestrian traffic

This means that none of the street is suitable for MDRS. Under the current council proposals, the whole of the street falls within the Airport Noise Contour QM and I support this remaining the case.

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 29/04/2023

First name: Jeremy

Last name: Wyn Harris

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Oppose

I seek the following decision from the Council

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

We seek that the Council delays or reconsiders intensification of Cox and adjacent streets to properly accommodate privacy and sunlight concerns of existing homes such as ours.

Furthermore we request that the council also develop a plan that considers and limits the emission of carbon in the construction of high density buildings along with a plan on increasing the number of trees, plants and vegetation in the city to be included in any intensification plan.

Thank you for your time.

Jeremy, Joanna, Luke, Anna and Madeleine

My submission is that:

Dear planners,

We (Jeremy, Joanna, Luke, Anna and Madeleine Wyn-Harris) of 27 Cox Street are NOT in support of the district plan changes for the proposed High-Density Residential Zone.

We recently rebuilt our earthquake damaged home and as part of the process we obtained a resource consent (RMA/2019/380) which required us to adhere to privacy constraints and alignment with long term planning requirements (coherence/openness/attractiveness) of our small street. These requests were met along with thoughtful design of our home to face the northwest in order to maximise light and passive heating.

If the proposed plan was to go ahead for houses surrounding our property, then building more than 8m and 11m high (the current zoning for us), would cause loss of:

1. Privacy. Due to the significant use of glass in our living, lounge and hallway to bedrooms, there is a significant risk that we would lose all privacy to key areas of our home. Privacy to our backyard would also be impacted but as this is closer to north and west walls the impact would be lessened. We know that privacy is important, as we were required in our resource consent to keep trees on our north boundary to ensure privacy for our northern neighbours.
2. Sunlight. In winter, spring and autumn, we will lose a significant amount of light that we use for passive heating of our lounge, living, kitchen and upstairs areas. We would not receive any direct sun to these areas resulting in requiring active heating (electric or gas). Also any adjacent tall buildings would shade and impact growth of trees, plants and in particular grassed areas. Loss of greenery does not seem aligned with current environmental strategies. Greenery helps passively cool in summer months and is extremely important to human wellbeing.

At neighbouring heights of 16 or 32 metres, this renders aspects of our home unusable but also impacts the amount of greenery that

can be planted and sustained in the general area. We assume that other neighbours would also be impacted by similar privacy and sunlight issues, particularly due to the combination of orientation (east-west) and width of Cox Street (very narrow).

Furthermore, while we appreciate that density may need to increase in time, this both seems extreme and premature, and done without context to the rebuild, geography, geotechnical issues, environmental concerns and local housing supply/demand. Today there are a number of empty sections in the central city along with a central city population that both desires and requires intensification. We are unsure why we don't focus on low carbon intensification in the CBD (requiring more materials such as wood as opposed to concrete and steel) in the first instance. We think everyone in Christchurch would like to see a clean, denser inner city, rather than fragmented neighbourhoods of the occasional 32 metre high building built without consideration to materials that will result in significant emissions from construction.

Environmental factors (reductions of emissions in construction and preservation of greenery in cities) need to become a primary consideration in any city plan moving forward and the argument of the proposed plan simply does not address this. Please refer to <https://www.un.org/en/climatechange/cop26> which NZ strongly supported.

Yours Sincerely

Jeremy, Joanna, Luke, Anna and Madeleine

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 29/04/2023

First name: Gavin

Last name: Keats

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Seek Amendment

I seek the following decision from the Council

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

My submission is that:

High density six story housing does not rob neighbours on the Southside of winter sun.

Development only allowed when suburbs services such as power, waste and storm water are upgraded.

Noisy plant such as heat pumps, hot water heat pumps, inverters be installed in an acoustically isolated plant room.

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 29/04/2023

First name: Gavin

Last name: Keats

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Seek Amendment

I seek the following decision from the Council

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

My submission is that:

the changes proposed to the government's plan by the Christchurch City Council do not go far enough for the following reasons:

1. no mention is made of not shading solar panels on a neighbour's roof. This form of distributed generation is going to be very important in future and it is unacceptable that householders can spend money on solar panels and then have their generating ability reduced by neighbours.
2. it needs to be specified that all height limits should include any chimneys, flues, HVAC units, FCUs etc.
3. the high and medium density zones around commercial centres are too large.
4. it needs to be specified that the 20 sq m of planting/outdoor living per section needs to be a usable shaped area, eg not a long narrow strip.
5. more allowance needs to be made for Christchurch being a drained swamp, and prone to flooding.
6. more reference needs to be made to how the cost of upgrading sewer and storm water is to be paid for every time a building consent is issued that means higher density.

I am pleased that CCC is trying really hard to improve things for Christchurch. As the rebuild progresses we have such a lovely liveable, walkable, and bikeable city, it is such a shame if government rules mean developers can push the council into approving poor housing design.

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 29/04/2023

First name: Gavin

Last name: Keats

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Seek Amendment

I seek the following decision from the Council

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5. more allowance needs to be made for Christchurch being a drained swamp, and prone to flooding.
6. more reference needs to be made to how the cost of upgrading sewer and storm water is to be paid for every time a building consent is issued that means higher density.

I am pleased that CCC is trying really hard to improve things for Christchurch. As the rebuild progresses we have such a lovely liveable, walkable, and bikeable city, it is such a shame if government rules mean developers can push the council into approving poor housing design.


Our proposed Housing and Business Choice Plan Change (14)

[Submitter Details](#)**Submission Date:** 26/04/2023**First name:** Simon**Last name:** Watts**Organisation:**

Brighton Observatory of Environment and Economics

Preferred method of contact Email

Attached Documents

Name	
20230425 CCC DPC14 2	

26 April 2023

CCC Plan Change #14: Housing and Business Choice.

Thank you for the opportunity to submit to this process. Please accept this letter as a submission into the IHP process from The Observatory.

At the outset, it is worth noting that the disbenefits of living in a sprawling city like Christchurch are already considerable. These negative impacts include transport, energy, housing (location, quality and costs), social-equity and health. Hence, we are not 'starting from zero', but are already in a negative situation where significant slices of our communities are already accruing disbenefits disproportionately.

Generally, the benefits of intensification, particularly to a sprawling city like Christchurch include:

- increase the attractiveness and accessibility of our Garden City
- helping to solve the housing crisis by increasing housing affordability, hence provide part of solution to social inequity in our city.
- reducing road transport emissions (the largest component of the CHC GHG emissions profile), as more people live closer to active/public transport routes and work places
- reducing the health and wellbeing/isolation impact of living in our city
- decrease climate impact of the city (energy and transport emissions)
- decrease the impact of the city on the environment including ecology and habitats.
- increase the economic viability and vibrancy of the city: greater population density closer to amenities and services
- potentially increase safety in the community
- likely reduction of rates

For these and other reasons around how we adapt to climate change, we wish to indicate strong support for *smart intensification*. For Christchurch this would look like intensification in the central city, and much less in the outer suburbs. A city that is no longer growing its territorial footprint but nonetheless increasing its population.

Typically, this could allow:

- increase the attractiveness and accessibility of our Garden City by for example increasing tree cover and local character (*e.g.* Woolston Village)
- Getting people out of cars onto public transport, freeing up central city land (currently car parks) for more beneficial development.
- Getting people further from traffic, wider pavements, local gardens and parks, off-road cycleways
- *etc...*

The alternative to allowing intensification is building more sprawling subdivisions which destroy our high value soils, and/or situated as currently on unsuitable floodplain sites, or wetlands, increasing the risk of catastrophic floods in the future.

Our comments on the PC #14 proposal largely on the qualifying matters (QM, particularly:

- Sunlight Access QM
- Inclusion of Tsunami risk in the Natural Hazards QM

Sunlight Access QM

Local government has amongst its responsibilities implementation of national guidance and regulations into local systems and plans. Clearly this will often be nuanced to reflect local character and conditions. If Sunlight Access is included as a QM then this is likely to:

- a. significantly delay the intensification process: it would allow retention of current or similar height/stories restrictions on new builds which would stall construction of higher buildings over the whole city.
- b. Further restrict the planting of trees which apart from their positive effect on biodiversity, Carbon draw-down, well-being and land stabilization, would lower the heat island effect of the city, hence reduce the impact on residents of the more intense and frequent heatwaves predicted by climate change.

Both of these implications are exactly counter to the direction of travel implied by good and timely adaptation to climate change, as well as that implied by central government in the recent NPS on highly productive land. We estimate resolution of the underlying issue (including Sunlight Access as a QM) pushes back intensification by at least a further two years plus planning time (*i.e.* it is not possible to construct the business plan for these types of development when extant regulation effectively does not permit them).

“Many other cities in the Northern Hemisphere with latitudes equivalent or further from the equator than Christchurch have very liveable cities with high density living, therefore sunshine is not an issue if we use these cities as example to develop towards.¹”

It seems to us that this QM has the same effect as a Trojan Horse to prevent the intensification process in Christchurch.

Inclusion of Tsunami Risk Area in Natural Hazards QM

It is obvious that the planning system should be used to reduce development in areas that are exposed to well quantitated very high risks of significant damage from natural hazards on short timescales. However, unless there is a reasonably good understanding of the scale and timescale of the hazard, and that timescale is short (typically, less than a human lifetime),

¹ https://www.generationzero.org/ccc_pc14

heavy regulation can have the effect of causing social and economic damage for no good reason, e.g. moving communities out of areas too soon, when in reality those communities could have stayed for another 50-100 years.

The issue with including tsunamis in the definition of the coastal hazard zone, is the zone is stretched unrealistically. This bloated coastal hazard zone is then based not on our knowledge, but rather our lack of it. For example the mapping of the zone includes about a 1m sea level rise (by 2100) plus the effect of a major tsunami (we estimate 5-10m), that affects the NZ South Island eastern seaboard. This series of sequential over-estimations produce a practically impossible scenario and an unrealistic estimation of the zone:

- the tsunami must occur after the 1m of sea-level rise (CCC posited as 2100). The IPCC (the world consensus of scientific and social knowledge about climate change) now consider sea-level rise of 1m by 2100 a large over-estimate, or in their own words, ‘not realistic’.
- the vast majority of tsunamis arriving here are small enough not to be noticed, and only two seismic sources (Cook Strait and South American seaboard) realistically would affect the Christchurch coastline.
- the data (see below) produces a very weak prediction and does not support the assessment of this hazard to be likely enough or large enough to be included in definition of the coastal hazard zone.

Although both tsunamis and earthquakes are natural hazards, the occurrence of neither is particularly predictable. Whereas deaths in our (NZ) recorded history from earthquakes is about 500, only 1 death has been recorded from tsunamis. Clearly prior to that history there have been significant earthquakes and tsunamis that have potentially caused deaths and devastation. However, principally due to our lack of understanding of the detail of processes that cause earthquakes and/or tsunamis at a particular time and place, we use frequencies of event occurrence in the past as a proxy for prediction. Typically this leads to what can be very weak estimates, for example:

“...A total of 24 tidal waves classified as a tsunami since 1855...The strongest tidal wave registered in New Zealand reached a height of 15 meters (02/02/1931)...The biggest impact in terms of lives and the economy has been a tsunami on 08/13/1868. A tidal wave of up to 4.5 meters killed 1 person and destroyed vast areas².”

Even strong predictions of these hazards carry with them many assumptions, incomplete records, and statistical uncertainty, for example...

“...The NZ Alpine fault fails in a magnitude 8 earthquake about every 330 years³...”

... does not rule out two magnitude 8 earthquakes from the Alpine fault 100 years apart or one in 600 years.

² <https://www.worlddata.info/australia/new-zealand/tsunamis.php#:~:text=A%20total%20of%2024%20tidal,a%20height%20of%2015%20meters.>

³ <https://www.gns.cri.nz/our-science/land-and-marine-geoscience/our-plate-boundary/alpine-fault/>

Our current state of knowledge does not allow for any reasonable forecast of the timescale of a large tsunami that would justify the size of the proposed coastal hazard zone.

Ngā mihi,

Simon Watts.

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details


Submission Date: 28/04/2023

First name: Shirley

Last name: van Essen

Preferred method of contact Email

Attached Documents

Name	
Airport	

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 28/04/2023

First name: Shirley

Last name: van Essen

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Oppose

I seek the following decision from the Council

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

I seek that the council delay the closure date for submissions until the requirements of the resource management act have been met. Investigation into the social consequences of plan change 14 should be performed and published.

I seek for the airport corridor to be widened.



I seek that TC3 land should remain residential suburban.

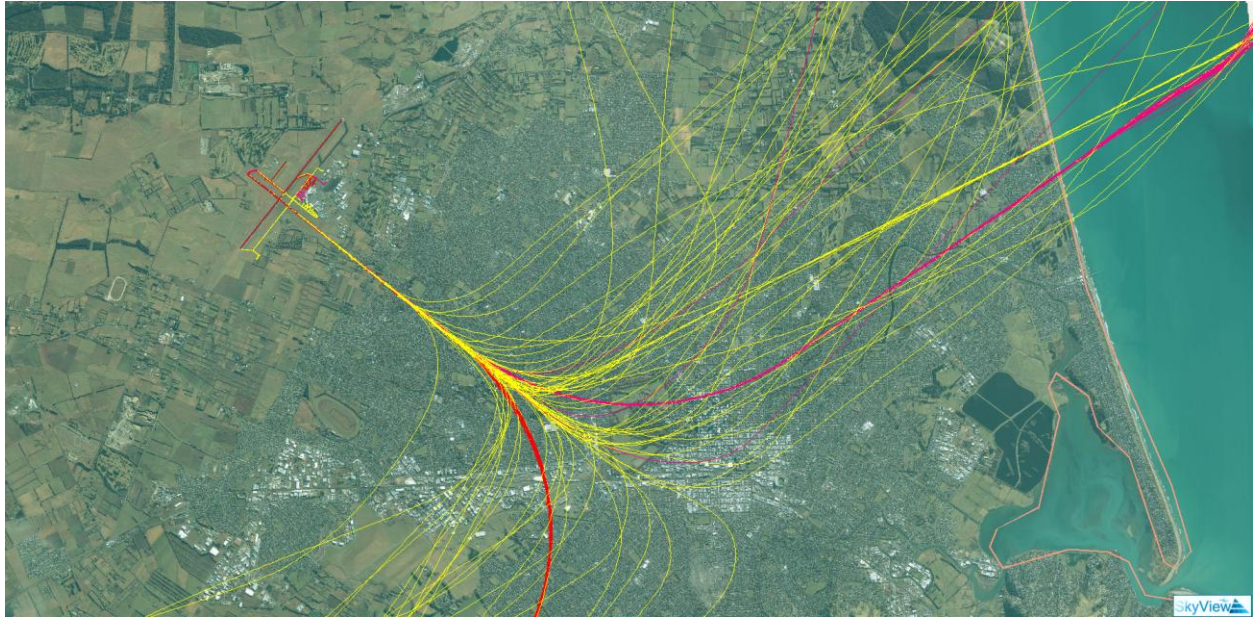
I seek that the council do up to date modelling on the likely population growth.

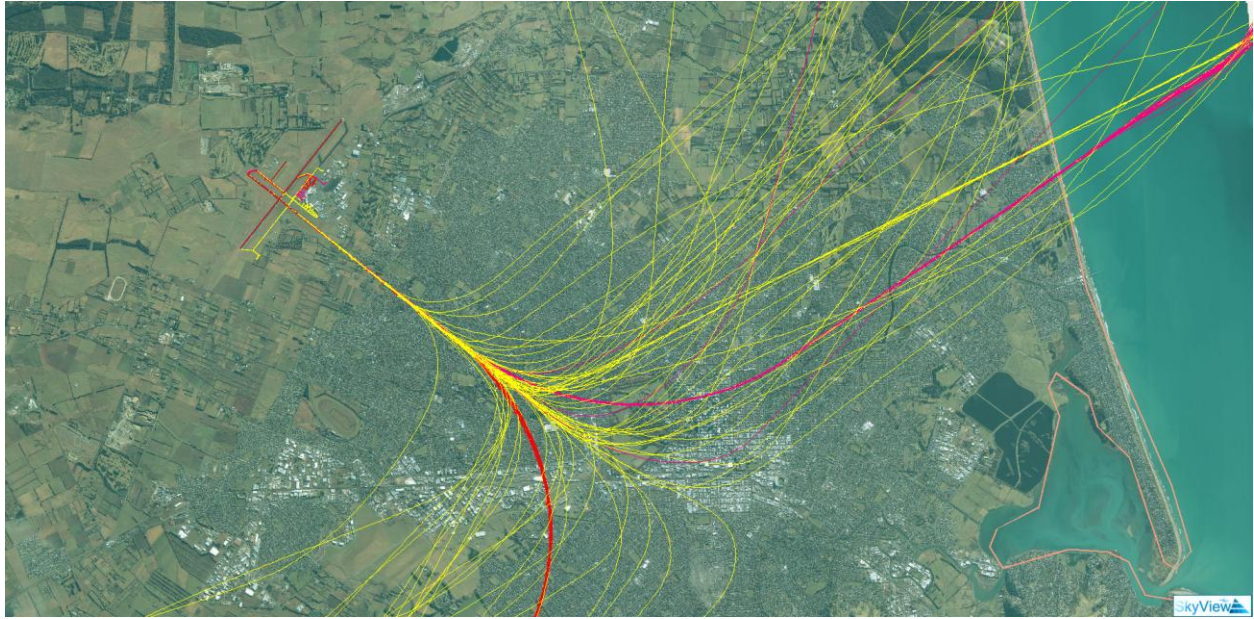
My submission is that:

Please see supporting word document. I attempted to write it in this box, but the website glitched and would not function correctly. Please inform your IS team.

Attached Documents

Name	
Airport	
The closing date for submissions of 3 May is not valid for plan change 14	





The closing date for submissions of 3 May is not valid for plan change 14. The Resource Management Act 1991 s32 requires the Council to report on the social effects of this plan change. The Council still has to undertake and publish this report and analysis, to comply with the Law. A minimum of six weeks is then needed before submissions close on all the aspects of the Plan Change including the social effects. However, as an interim measure I will outline a partial submission, to be completed when the Council has produced the analysis that the law requires them to undertake.

I object to the notification of Plan Change 14 by the Christchurch City Council. The plan change goes against the wishes of many of the Residents and all of the Residents Associations in the city. The councillors who voted to notify had been warned that if they did not agree to notify, something worse would be imposed by the Government. It is clear that the Councillors notified because they feared "something worse" and not because they believed that the Plan Change 14 was good for the city. The City Plan implemented after the 2011 quake allows for densification which does not adversely affect the character of the city, and that is the plan we should follow.

I do not agree with the statements made about the future growth of Christchurch. New Zealand's birth rate is low, there is expectation that the world population is going to decrease in the next decades, so unless there is mass immigration, the population of Christchurch is not going to "double" anytime soon. I suggest that other more realistic "modelling" be undertaken.

Most of Christchurch is built on very deep recently deposited alluvium which is not compacted (Geology of the Christchurch Urban Area, LJ Brown and JH Webber Institute of Geological and Nuclear Sciences Ch 6). Tonkin and Taylor divided the city into TC1 TC2 and TC3 areas after the 2011 earthquake, TC3 being the least able to support the weight of buildings and the most at risk of subsidence and liquefaction. Accordingly it was recommended that buildings in TC3 areas be as lightweight as possible, at most 2 storeys high, and have a TC3 Ribraft foundation, consisting of 2 slabs of reinforced concrete, the upper slab being adjustable, in order to level the house after the next earthquake. The next earthquake will cause liquefaction and uneven settling of the loose alluvium. Densification will need considerable underground infrastructure investment by the Council to service a hugely increased local population. This investment is likely to be obliterated by liquefying and settling in TC3 locations in the next earthquake. TC3 land is absolutely unsuited to large heavy buildings covering most of the site. I submit that all TC3 land remain Residential Suburban.

My home is 36A Kahu Rd which lies next to but not within the airport corridor, Last year I noticed that an increasing number of planes were turning earlier and flying right over our house and even to the east of it, well outside the corridor. I complained about the noise and received inter alia this explanation from "Airways" in which they admit that many pilots are not trained, nor aircraft equipped, to follow the intended approach, and therefore make visual, wider approaches outside the air corridor.

"aircraft qualified to fly the RNP-AR approaches [RNP is a type of PBN flight path] into NZCH are the A320/321/A[3]20N/ Some B738 [jets] and ATR [turboprop] types. (Air NZ/ Jetstar/

Qantas etc). Regarding the ATR fleet, only 40% of their pilots are trained on these type of approaches, so most have to navigate visually towards the RWY 29 threshold for landing. All the other regular aircraft [that frequent ChCh airport] DH8C/ Military aircraft/ PC12/ CL60/ C441/ CVLT/ BE20 will all fly visually for RWY 29. Heavy aircraft and some international flights track via RWY 02/20 [even when the cross runway 11/29 is the duty runway]'. As a result, the paths taken by pilots not trained to and aircraft without the technologies required to fly the RNP-AR approaches use visual flight rules (their eyes) to line up on the runway to land. This means that the paths they choose will vary from the PBN flight tracks.

'We [Airways] would be happy to invite the complainant to visit us at Airways and I can show them on radar, the difficulties ATC [Air traffic control] and pilots have when RWY 29 is the duty runway. The airspace is very limited out to the east of NZCH, so there are not many different tracks that pilots can utilise. As an example, aircraft on a 'normal' RWY 02 or RWY 20 day, track via an 8- 12 nautical mile final approach. We only have 6 nautical miles for RWY 29 and can realistically only use 4NM or less. It's also very difficult to navigate visually over the central city, as aircraft you are following become lost in the city terrain features. Aircraft nowadays, fly safe, predictable and stable approaches... The close/ fast/ tight approaches they used to fly are slower and wider now, as such, this may explain the new routes that the complainant is viewing. It's all part of the strategic policy process keeping our travelling public safe.'

I attach the chart supplied by "Airways" showing the actual flight paths used by aircraft approaching the airport from the east, showing that the air corridor is not nearly wide enough. Although this does not solve my personal problem of aircraft noise, I submit that it is clear that the Airport Corridor should be widened to include at least 34 36 36A and 38 Kahu Road and also more properties west and south of Kahu Road between the two bridges over the Avon river. Properties like these and others under a wider air corridor should remain Residential Suburban.

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 29/04/2023

First name: Tobias

Last name: Meyer

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 10 Designations and Heritage Orders

Support

I seek the following decision from the Council

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

My submission is that:

Protecting some is fine but please don't extend it out more just to serve interests of wealthy land owners

Provision: Chapter 6 General Rules and Procedures

Seek Amendment

I seek the following decision from the Council

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

Removal or loosening of the qualifying matters

My submission is that:

Attached in pdf.

Provision: Chapter 14 Residential

Seek Amendment

I seek the following decision from the Council

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

Allowing commercial use on corner sites

My submission is that:

Allow some mixed use.

Provision: Chapter 13 Central City

Seek Amendment

I seek the following decision from the Council

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

Extend the HRZ further out, to at least 2km from city center and 1km from large local centres

My submission is that:

Current zones do not align with legislation.

Provision: Chapter 1 Introduction

Seek Amendment


I seek the following decision from the Council

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

My submission is that:

General support with some changes. I want to note that I filled in this form multiple times but the submit button disappeared so I have attached my main submission instead. I am sorry if it is not in the correct section but this form was not working.

Attached Documents

Name	
pc 14 submission	

Looking at the plan I think it is important to clarify that density done right is good. Choice of housing in good places, with density done right- this plan severely kneecaps. Density is good in particular in 3 areas: Environment, Equity, and Economics.

Starting with economics:

With more people closer together, public transport and local businesses are much more viable. Also the costs for city services and infrastructure are less. More people will support the local economy while also providing more rates. This is especially true in the closer suburbs where there is easier access to high quality council facilities and public transit.

For the environment:

Density is one of the best tools we have towards being carbon neutral. We are not currently on track and the council is obliged to be aiming for it. The climate change commission (recommendation 10) calls for building upwards and allowing mixed use. Density promotes easier access and shorter trips where most car trips can be replaced by active modes or public transport. Studies are clear that electric vehicles are not enough, we need to reduce car usage. Density can also result in more green space as we build up and not out- both for the wider city but also on individual lots. Better to have more stories at the front of a lot and an empty back then two stories and driveway covering every inch.

For Equity:

Sprawling low density housing is bad for mental health. Walkable neighbourhoods result in more social interaction. This is especially true for those who don't drive: children, the elderly and the disabled. Much better for them to be able to get around without a car and to have access to good spaces.

Studies also show that the poor have less access to private vehicles. More housing closer to the city means there is more ability to live well without a car. Far out of the centre even with good public transport people have to spend lots of time travelling, especially for early or late shift work. Even if most of the new housing is expensive, all new housing reduces overall prices.

Currently there is an effort from the council to keep property values high. There is a housing shortage and cost of living crisis and frankly it's immoral. Opening up housing will create more, make it easier for first home buyers, and keep rents down. Some don't want this as they profit from high rents and home values but as leaders you have responsibility for those who can't speak for themselves.

Density is important for economics, the environment, and for equity.

These three all influence each other. Currently lower high prices are attracting many young professionals from other cities, who are coming and contributing to Christchurch. I know software developers, lawyers, bankers, teachers who have moved here because of house prices. As Auckland and Wellington's housing market cools we are losing our edge.

From extensive study I've done I know that good density increases livability and walkability is the best. More social interactions, more walking, better quality air, more local businesses.

What we need is more housing density. What does good density look like?

Access to commercial areas through mixed use zoning, and good public spaces and greenery.

In suburban contexts 3 floors is enough, but the current MRZ makes 3 floors difficult or inconvenient and incentivises developers to cover most of the lot with odd shaped buildings and driveways. The current developments in Wigram and Rolleston use a large portion of land for small numbers of people. Higher density buildings allow for more green space.

For good density and walkability more than 3 floors best- 4-8 floors. With lift requirements it is expensive to build for 4: which is the current standard in many of the best places in the current plan. It's better to allow more if people are building accessible apartments.

Current glazing requirement for street fronts is good. Enclosed streets make better spaces where people want to be. Wider streets feel nicer with taller buildings.

I think it is vitally important to incentivise development in the 5km closest to the city centre. This is the best place for people to live and the easiest place to live without a car. The current boundaries around city and local centres are quite small and could easily be extended a few blocks. Living near stanmore road I have easy access to the city. I call on you to increase the boundaries of HRZ and areas around local centres and either improve Mrz standards everywhere for more density or give extra incentive to MRZ in favourable places: Maybe even just within 3km of centre (at least within orbitor circle) and 500m of high frequency public transit routes. This is the area best suited to extra density. While our bus routes may change the current frequent routes will almost definitely be the same and be getting better. Even living 5km out from the centre has easy access to the city and other local centres.

Possible incentives for MRZ in the inner 5km ring from the middle of the city: smaller setbacks in front half of property with a larger allowable built envelope, or allowing small businesses in the zone, or lower council contributions, or even with enough setback can go above height limits on large sites if the housing is accessible Reiterate this is the place we want the most development.

Please do not push back density any more.

Qualifying Matters

Sunlight:

I don't mind the adjusted limit for the south border, but leave the other sides. Otherwise development is severely affected. Allow north and east/west to be according to MDRS at least. Also perimeter blocks make more sense for good development so make the allowable envelope higher/remove for front of property: even if just for less of front 12m or 40% of property.

Public transit access:

This should be removed as a qualifying matter, or the areas need to be massively downsized. Currently some areas affected by them have good access to PT, eg: Sumner has a high frequency route into town, and other areas have easy cycling into town or are close to local centres. Buses can also be added and an increased population will make them more viable.

Riccarton bush:

The zone around it doesn't need to be as large. Riccarton is perfect for intensification and should have the highest density out of the central city. The south side of the bush is very close to amenities and the local centre and easy access to town. Taller buildings won't block sunlight, especially on the south side.

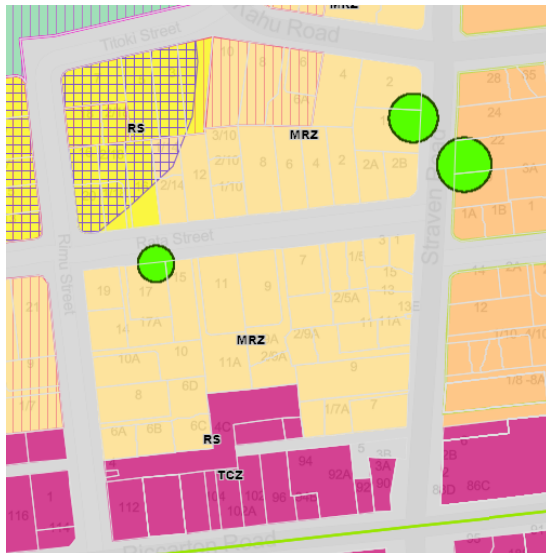
Airport noise contour:

This covers too much of the best land for densification. Put the noise into the LIM and let developers and buyers decide. Having lived in that area the noise is not an issue. Perfect location with amenities and access to Uni. This should be cut back so that at least the 5km from the city centre is not covered by it.

Areas to change:

Addington: Why is it not a local centre? This is a very desirable place to live for young professionals. Very close to the city centre and other amenities.

Riccarton: Between mall, Straven road and Kahu road is a section of MRZ with no extra restrictions. This is very close to the local centre, it should be HRZ.



Areas within 2km of central city that are currently Mrz. On the simple zoning map this area comes under HRZ and it is close to the city. Eg area to west of stanmore road, and west of Antigua street. The central city HRZ should be pushed out further, or additions should be added to the Mrz in this prime location.

I've lived in Riccarton and Linwood without a car, and while not everyone wants the same lifestyle it's good to have a choice. I'm a teacher and I own a house and I want to live in an apartment near the city. Higher density areas are attractive to me, and others.

Evidence is clear that density is good for our environment, it will support the economy, and is helpful for equity. Look to the future of our beautiful city rather than protecting the interests of wealthy homeowners. Please support the interests of the city and those who haven't been able to speak for themselves.

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details


Submission Date: 29/04/2023

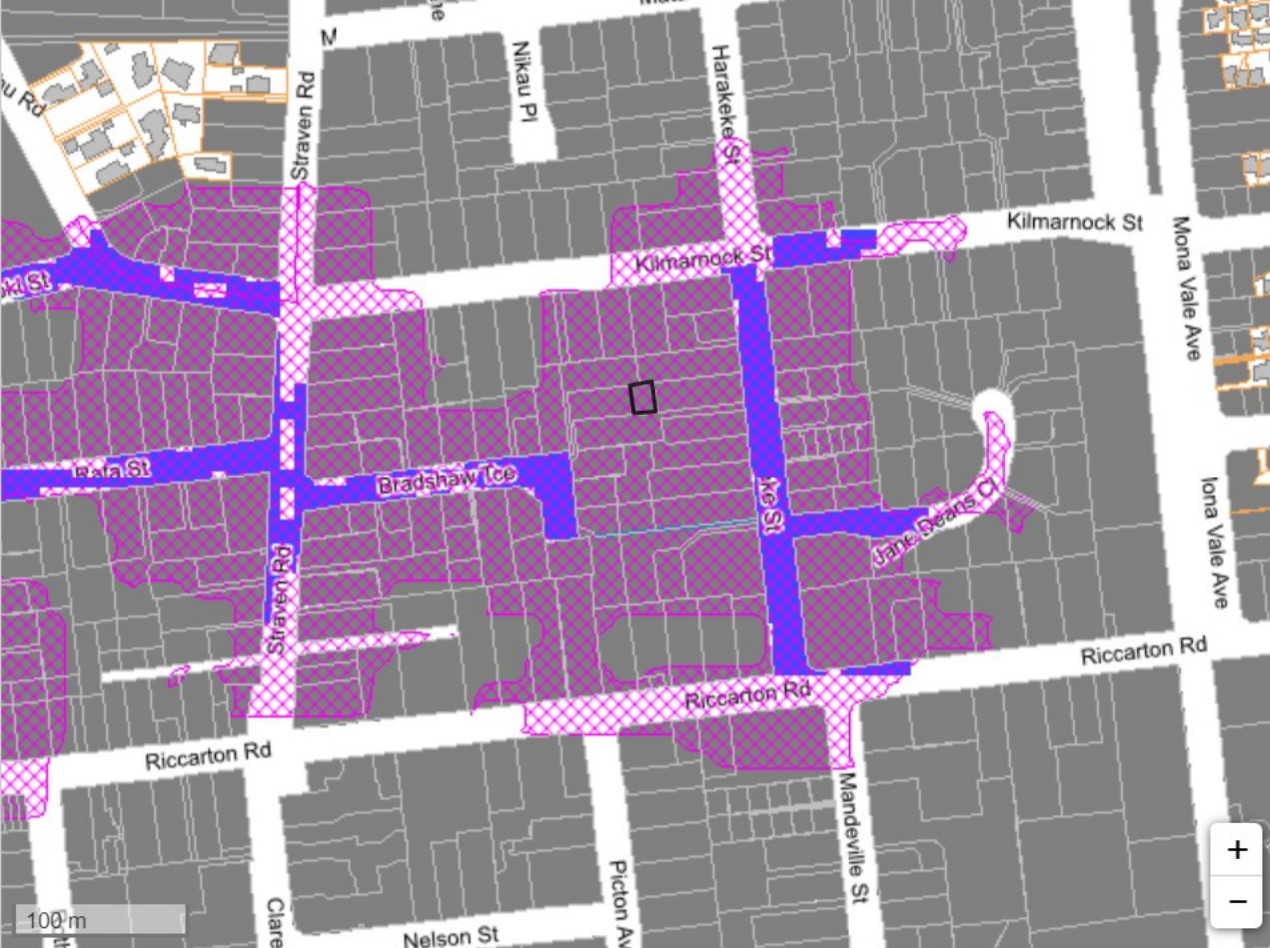
First name: Joanna

Last name: Knight

Preferred method of contact Email

Attached Documents

Name	
Flood map	



- Flood extent (50 year)
- Flood extent (200 year)
- Flood extent (50 year)
- Assessment Incomplete
- Floor Level Assessment

District Plan

Map

- Specific Purpose Flood Recovery Zone
- Flood Management
- Waterway

Area (50 ☒

ar) ☒

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☐

at Land ☐

Area ☒

☒

How to have your say

We welcome your submission on our proposed Housing and Business Choice Plan Change (PC14) and/or proposed Heritage Plan Change (PC13).

If you're having trouble making a submission, we have a Friend of Submitters service available to help. Please email **CHCHPC13-14@jwest.co.nz** or call 03 941 6886.

PO Box 73016
Christchurch

Written feedback

Fill out an online form by
11.59pm on Wednesday 3 May 2023 at
ccc.govt.nz/haveyoursay (preferred)

Complete the feedback form enclosed
and drop off at:
Te Hononga Civic Offices
53 Hereford Street
Christchurch
by **5pm Wednesday 3 May 2023**

Email **engagement@ccc.govt.nz***

Post written comments to:
Freepost 178
Housing and Business Choice Plan Change/
Heritage Plan Change
Christchurch City Council

***Your feedback needs to include all of the 'required information' in the submission form on the next page.**

Submissions are public information

Subject to the provisions of the Local Government Official Information and Meetings Act 1987, we will make all submissions publicly available, including all contact details you provide on your submission. If you consider there are reasons why your contact details and/or submission should be kept confidential, please contact the Engagement Manager by phoning 03 941 8935 or 0800 800 169.

28 Kōrero mai | Have your say on the District Plan changes: Housing and Business Choice (Plan Change 14) and Heritage (Plan Change 13)

online

Have your say

Save time and do it

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: Female

Age: 35-49 years

Ethnicity: New Zealand European

** Required information*

Name* Joanna Knight

Address* 3/15 Bradshaw Terrace,

Postcode* 8011

Email joliz.knight@gmail.com

021 280 4186

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

Organisation's name

Your role

Trade competition and adverse effects* *(select appropriate)*

I 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 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

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:*

Allowing no off street car parks

Ability to build up to six stories without resource consent

Ability to build 3 x three storey homes in one section without resource consent

My submission is that:*

I am opposed to the Housing and Business Choice Plan Change 14 due to the negative impact it will have on the communities this is imposed on. The following impacts I can see are:

Loss of sunlight leading to increased electricity costs, mental health impacts and general enjoyment of properties

Increased congestion on the road leading to more pollution and an increase in risk while using the road

Increased car crime and antisocial behaviour with vehicles parked on the road leading to increased insurance premiums

I seek the following decision from the Council:* I wish for the council to be able to use the plan they made initially after the earthquakes.

I believe the council should be able to incentivise owners of empty sections or uninhabited homes in Christchurch to develop them and make them available for housing.

(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.)

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.)*

My submission is that:*

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

I seek the following decision from the Council:*

(Please give precise details stating what amendments you wish to see made to the proposed Plan Change. Please continue on separate sheet(s) if necessary.)

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

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 29/04/2023

First name: Debbie

Last name: Smith

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 6 General Rules and Procedures

Oppose

I seek the following decision from the Council

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

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

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

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

My submission is that:

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

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

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

The dimensions of the site at **166 Chester Street - narrow frontage with a total land area of 550m² - does not allow space for any design variation for a 3-4 level development to mitigate the loss of light to** my neighbouring property. The possible amalgamation of a number of these smaller narrow sites may allow for better

more creative design to lessen impacts to neighbours, but the No.166 site alone can only allow for one skinny towering box that will shadow everything to its east.

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

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

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

Provision: Chapter 9 Natural and Cultural Heritage

Seek Amendment

I seek the following decision from the Council


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

My submission is that:

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

Please refer to the attached document for my full submission.

Attached Documents

Name
HeritageChangePlanSubmission 

SUBMISSION TO: The Christchurch City Council

ON: Heritage Plan Change

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

CONTACT: debbieasmithnz@gmail.com

1. SUMMARY OF MY SUBMISSION

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

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

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



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

2. HISTORICAL BACKGROUND

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



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



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

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

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

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

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

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



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

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

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

3. ONGOING DEVELOPMENT

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

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

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

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

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

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

Date of this submission: 29 April 2023

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 30/04/2023

First name: Stephen

Last name: Walsh

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Oppose

I seek the following decision from the Council

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

1 Reduce the extent of the medium density plan.

2 Introduce this plan in smaller manageable stages to allow infrastructure to be added appropriately.

My submission is that:

Your medium density residential area encompasses almost the entire Christchurch suburban area- certainly the inner suburbs .

1 We are already seeing 'slum like' areas of multiple and poorly built dwellings on previous single dwelling sections . Developers appear to have little control set over the quality of their work.

2 You will have multiple adults and families on each sections and no matter what ideal you have in mind ,there will be multiple vehicles with no parking. Streets will be crammed . The aesthetic pleasantness of Christchurch suburban life and family friendliness of the suburbs will be lost forever. There areas surround many of our schools.

3 What plan is there for infrastructure? What are the costs of increasing sewerage and waste water needs? The lack of gardens to soak up rainfall will lead to significantly more flooding events. You will need multi high rise parking buildings in suburbs for people to store their cars as they can't at their dwelling. We have malls and distant supermarkets and no shopping precincts dotted about suburbs for people to easily walk and bike to for groceries etc.

These are but a few issues.

4 Your high density housing is most suited for single people and younger couples without children so reduce the area of the medium density plan .

5 Once more , the aesthetic of Christchurch will be destroyed rather than just altered . Reduce the scope of this plan or at least introduce it in more manageable stages so infrastructure issues can be addressed . You cannot create a "European like ' inner city instantly.

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 30/04/2023

First name: Theo

Last name: Sarris

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Seek Amendment

I seek the following decision from the Council

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

The height for the Sunlight Access Qualifying Matter
needs to be reduced to 2.5 metres and the boundary angles to 45 degrees


My submission is that:

The Sunlight Access Qualifying Matter does not go far enough to protect existing and new buildings ensuring a healthy home. There need to be provisions that consider the needs of single story homes, either existing or new. There needs to be a provision that there will be year round, full sunlight at the base (slab level) of a single story home in all three orientations.

Our proposed Housing and Business Choice Plan Change (14)

[Submitter Details](#)**Submission Date:** 30/04/2023**First name:** Heather**Last name:** Duffield**Preferred method of contact** Email

Attached Documents

Name	
Scan2023-04-29_122006	

HAVE YOU SAY: ccc.govt.nz/haveyoursay

HOUSING AND BUSINESS CHOICE PLAN CHANGE 14

Residential Intensification Rule Changes

The specific provisions of the plan change that my submission relates to are as follows:

I oppose the Dean Avenue Precinct becoming a HRZ Residential Zone.

My reasons for my opposition as follows:

1. I believe the Deans Avenue Precinct does not meet the criteria of Clause 14.2.7.2 of being within walking catchment of city centre and Riccarton Mall.
2. Deans Avenue is the only access to lots of houses within the precinct.
3. Parking is at premium. I live in Freyberg Avenue off Deans Avenue which is a No Exit street and the number of cars that park here especially the Hospital workers and people to visit the Mosque in Deans Ave.

There is no parking in the street for visitors to visit during the week or weekend.

I seek the following decision from the council.

**That Deans Avenue does not become: High Density Residential Zone, and remains.
Medium Density Residential Zone.**

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 30/04/2023

First name: Geoffrey

Last name: Banks

Organisation:

Victoria Neighbourhood Association (VNA)

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 1 Introduction

Seek Amendment

I seek the following decision from the Council

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

Refer to VNA Submission attached.

My submission is that:

Refer to VNA Submission attached.

Provision: Chapter 3 Strategic Directions

Seek Amendment

I seek the following decision from the Council

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

Refer to VNA Submission attached.

My submission is that:

Refer to VNA Submission attached.

Provision: Chapter 6 General Rules and Procedures

Seek Amendment

I seek the following decision from the Council

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

Refer to VNA Submission attached.

My submission is that:

Refer to VNA Submission attached.

Provision: Chapter 13 Central City

Seek Amendment

I seek the following decision from the Council

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

Refer to VNA Submission attached.

My submission is that:

Refer to VNA Submission attached.

Provision: Chapter 14 Residential

Seek Amendment

I seek the following decision from the Council

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

Refer to VNA Submission attached.

My submission is that:

Refer to VNA Submission attached.

Provision: Chapter 15 Commercial

Seek Amendment

I seek the following decision from the Council

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

Refer to VNA Submission attached.

My submission is that:

Refer to VNA Submission attached.

Provision: Planning Maps

Seek Amendment

I seek the following decision from the Council


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

Refer to VNA Submission attached.

My submission is that:

Refer to VNA Submission attached.

Attached Documents

Name
PC14 VNA Combined Submission April 2023 

Plan Change 14 Submission BY The Victoria Neighbourhood Association (VNA)

Introduction to the VNA

This feedback is submitted on behalf of the Victoria Neighbourhood Association Inc, one of six residents' groups in Christchurch Central City. Its boundaries are Victoria Street – Bealey Avenue – Colombo Street – Salisbury Street and which includes Airedale Place; Beveridge, Conference, Durham, Montreal and Salisbury Streets; Gracefield Avenue and Knox Lane. See map below.



The VNA was formed in 1985 (incorporated in 2010). Its primary objectives are to

- enhance and protect residential amenity in the neighbourhood;
- ensure members and other residents are kept up to date on matters affecting them;
- respond to consultations and surveys from at least the Christchurch City Council, our Community Board and ECan;
- represent members' views in submissions and presentations; and
- initiate or support social activities in or near the neighbourhood.

We currently have 180 financial members. Another 60 residents and property owners participate in some VNA activities and are consulted on matters affecting the wider neighbourhood. We also communicate with 70 or more residents via notices in letterboxes.

The VNA has participated in all stages of Plan Change 14, including City Council briefings on 17 April, 2 May and 5 May 2022; Council meetings on 12 July, 8 and 13 September 2022 and 1 March 2023; webinars of 14 December 2022 and 16 February 2023. VNA provided written feedback on CCC's initial proposals on 12 May 2022 and presented VNA's perspective to Councillors on 8 September 2022.

The VNA neighbourhood is arguably the most diverse in the city, encompassing dwellings ranging from historic workers' cottages, to original villas, to new townhouses and multi-unit apartments; from social housing to multi-million dollar private homes; and short- and long-term rental accommodation. Residents include families, young people, workers from a variety of occupations and retirees. Many have lived here for over 30 years.

Preparation of this submission

This submission, together with prior public feedback sought by the Christchurch City Council, was prepared by a team of four VNA members, formed in April 2022 and coordinated by Geoff Banks.

See the following pages for topic-specific submissions covering:

Rules Feedback

Topic 1: Specific Purpose (Hospital) Zone: Christchurch Women's Hospital (CWH) Zone

Topic 2: Specific Purpose (Hospital) Zone: CWH Bulk and Location

Topic 3: Central City HRZ Zone: Bulk and Location

Topic 4: Central City HRZ Building Heights

Topic 5: Central City HRZ Zone: Landscaping, Trees

Topic 6: Sunlight Access Qualifying Matter

Topic 7: Victoria Street

Topic 8: 90m Building heights in Central City Zone

General Feedback

Topic 9: Horizon of PC14 Changes

Topic 10: Consultation Approach

Topic 11: Chapter 3 Strategic Directions

Topic 12: Oversupply

Topic 13: Density and Services – An Unbalanced Residential Central City

RULES FEEDBACK

Topic 1: Specific Purpose (Hospital) Zone: Christchurch Women's Hospital (CWH) Zone

This feedback relates to the site of the former Christchurch Women's Hospital (CWH). It extends from Colombo St to Durham St North, and between residential sites to the north and south.

Feedback is on the Alternative Zone designation of HRZ (Appendix 13.5.6). We do not consider that any alternative zone designation should be applied to this site under PC14, for the reasons given below.

1. Background

- 1.1 Policy clause 13.5.2.1.3 a. This clause seeks to encourage comprehensive residential development of hospital sites (except Christchurch Hospital) that are no longer required for hospital purposes.
- 1.2 Appendix 13.5.6.1 Alternative Zone Table lists an Alternative Zone for the former CWH as HRZ.
- 1.3 We have seen written correspondence from Te Whatu Ora, 19 April 2023, saying: *"No decision has been made yet about the future use or any sale of the former Christchurch Women's site at 885 Colombo Street."* And *"The site has not been declared surplus to requirements..."*.
- 1.4 We have seen written correspondence from CDHB to the government, 2021, advising that the site is *"...not completely lost to health in case there was a need in future (Health would be unlikely to secure a large, central site like this ever again"*.
- 1.5 Property Economic CBA (ex S32 Evaluation) Section 5, states that *"Property Economics understands that the current and anticipated future realisable capacity estimates commissioned by Council indicate sufficient levels of capacity for the city and for Council to meet its obligations under the NPS-UD. Property Economics also understands that the level of sufficiency is substantial and that minor losses, even of a cumulative nature, will likely not endanger the city's ability to meet future demand."*
- 1.6 We are aware of research demonstrating the increased health needs of Canterbury residents following the Canterbury earthquakes, soon to be presented at the Pacific Conference on Earthquake Engineering in June 2023.
- 1.7 We have seen written advice from CCC in April 2022 during the Housing Choices public feedback period that *"The changes do not apply to the specific purpose zone..."*, in response to a specific query regarding the former CWH. As a consequence, no feedback was given by VNA regarding the site at that time. Now that changes have been included for this SP Zone, it has been challenging to research the matters and engage with our residents and others properly when the change was proposed in the draft PC14.

2. **Commentary**

- 2.1 The former Christchurch Women's Hospital is NOT a property that is no longer required for hospital services. The hospital has stated that this property is not surplus to requirements, has identified that it should not be lost to a health use, and that it would be unlikely to secure a site like this ever again.
- 2.2 The site therefore does not fall within the category of no longer being required for health use and is unlikely to ever be no longer required.
- 2.3 The CDHB have identified the uniqueness of this site for health use and that. If lost to health, they would not be likely to ever be able to replace it.
- 2.4 Research has identified specific greater health needs in Canterbury as a consequence of the recent earthquakes. With the impact of other disasters, there may be a growing need for research into, and treatment of, long term health needs.
- 2.5 Property Economics have identified that substantial levels of housing capacity are enabled already by PC14 and the losses to capacity will not endanger the city meeting its obligations under the NPS-UD.

The evidence suggests that it could therefore be potentially damaging to residents' health, as well as being unnecessary, to lose this unique hospital site in the short/medium term to residential use which is very-well served elsewhere according to experts. If lost, the hospital has said that they would be unlikely to ever be able to replace it. Furthermore, as there has been little or no opportunity for public and transparent consultation on this critical issue, it should certainly not have an alternative HRZ designation as part of this PC14 process.

3. **Decision Sought**

- 3.1 Clause 13.5.2.1.3. Change *"(except Christchurch Hospital)"* to *"(except Christchurch Hospital and former Christchurch Women's Hospital)"*.
- 3.2 Appendix 13.5.6.1 Alternative Zone Table. Remove the row with the hospital name *"Former Christchurch Women's Hospital"*.

Topic 2: Specific Purpose (Hospital) Zone: CWH Bulk and Location

This feedback relates to the site of the former Christchurch Women's Hospital (CWH), as it is within the VNA neighbourhood. The same issues however may apply, or be addressed by others, to other Special Purpose (Hospital) sites. The CWH property extends from Colombo St to Durham St North, and between residential sites to the north and south.

Our feedback considers the effects of the bulk and location of buildings as proposed in the draft PC14. We note that these effects are required to be assessed under RMA Section 32 to evaluate the environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions, at a level of detail corresponding to scale and significance of the effect. Such evaluation is not limited by Section 32 to selected parts of the environment and therefore should include effects on both proposed new housing, and on existing housing.

We consider that the bulk and location clauses which impact sunlight and shading both within the CWH site, and impacting neighbouring properties, should be amended as described below.

1. Background

- 1.1 The VNA has previously submitted on shading aspects at the initial feedback stage and by way of a short deputation to the Christchurch City Council when voting whether to notify PC14.
- 1.2 We understand the broad changes subsequently made by CCC to reduce the recession plane angles from those noted in MDRS requirements to take some account of the latitude of Christchurch and significant adverse effects of that as a result of greater shading by buildings. Such changes for this site are described in draft Appendix 14.15.2 Diagram D.
- 1.3 We note what appears to be an error in section 13.5.4.2.4 Standard d(i) which references Appendix 14.16.2, not Appendix 14.15.2 which has the Diagram D. This diagram has recession planes from 3m high at the boundary and rising at 50, 55, and 60 degrees depending on boundary location. The same criteria are used for this site, and for MRZ and HRZ sites.
- 1.4 The SPH Zone draft also has proposals for:
 - Building from 14m and to a maximum 32m height at 10m from a road or internal boundary as restricted discretionary (RD)13(b). For all other sites, the maximum is 20m. We do not support the 32m height at 10m, but present an alternative.
 - Minimum building setback of 4m from road and internal boundaries at 13.5.4.2.4 Standard a. and b., which we support.
 - Maximum height of any building of 14m, at 10m from either a road or internal boundary at 13.5.4.2.4 c., which we support.
 - Buildings not breaching the recession planes of Appendix 14.15.2 diagram D, which we support, subject to reverting to current recession planes.

- No height in relation to boundary rule above 14m if buildings are set back more than 10m from a residential boundary at 13.5.4.2.4 Standard (d)(ii), which we do not support.
- Maximum building coverage of 60% at 13.5.4.2.4, which we support for hospital use alone, subject to the amendments we request in other areas noted above.
- Matters of discretion are given in Rules 13.5.5, including:
 - o Development mitigating the visual impacts at interfaces with public and private spaces at 13.5.5.2 (iv), which we support.
 - o Development minimising overshadowing, privacy and building dominance effects on residential neighbours or public spaces at 13.5.5.2 (ix), which we support.
 - o Whether an increase in height results in adverse visual and amenity effects on adjoining residential neighbours at 13.5.5.2 (x), which we agree should be a critical matter of discretion.
 - o Landscaping matters of discretion at 13.5.5.5 (b), which we agree should be a critical matter of discretion.

2. Commentary

2.1 We accept that the general revised recession planes shown in Appendix 14.15.2 D are a compromise between the MDRS standards proposed nationally (which have been adapted by CCC for the increased shading due to Christchurch latitude) and the lower recession plane starting height and angles currently applied to this site.

2.2 Our preference remains to maintain the current Plan's lower recession plane requirements (current Appendix 14.16.2 Diagram C), given that many recently-constructed homes, post-earthquakes, in the HRZ area and elsewhere have been constructed based on the level of shading resulting from those setbacks. The effects on those new homes would be compromised for a very long time by even the revised recession planes. We have yet to see any evaluation within the section 32 report assessing those adverse effects relative to the current Plan.

2.3 We are concerned that there is a restricted discretionary allowance to increase the maximum height from 14m to 32m, just 10m from internal boundaries and without any recession plane applying to the height increase. In terms of shading neighbouring properties, that would almost entirely negate the purpose of the recession plane within 10m of the boundary, and dramatically impact neighbouring properties. It appears to be very much inconsistent with 13.5.5.2 (x) and could be easily rectified by deleting clause 13.5.4.2.4 Standard (d) (ii). We have seen no Section 32 evaluation of this effect.

However, this CWH site is so large that it would still be possible to construct a 32m high building 25m from the southern boundary and 17m from the northern boundary within the diagram D recession planes. (The typical north/south site depth is over 91m, allowing a building width of 49m at 32m high).

In summary, for the reasons above, we would support buildings on this site being up to 14m high from 4m to 10m from internal boundaries, and whilst our preference is a discretionary height limit of 20m, would consider a discretionary build up to 32m high

provided it was at least 25m from internal boundaries, and subject to all building being within the diagram C (current) recession planes starting 2.3m above those boundaries.

2.4 We support the matters of discretion in rule 13.5.5.

3. Decision Sought

3.1 Appendix 14.15.2 Diagram D. In the absence of any site-specific S32 evaluation of impacts for this site, add a new Diagram E for this site which matches the current Plan recession planes being current Appendix 14.16.2 Diagram C (varying from 35 to 50 to 55 degrees, commencing 2.3m above the site boundary).

3.2 Reduce the maximum restricted discretionary height to 20m by deleting draft clause 13.5.4.1.3 (b) RD13 (b) (ii).

3.3 Apply recession planes to all buildings on the site by deleting clause 13.5.4.2.4 Standard (d) (ii).

Topic 3: Central City HRZ Zone: Bulk and Location

This feedback relates to the HRZ zone within the VNA neighbourhood area specifically, even though the comments may be applicable to HRZ areas beyond that extent. Refer to the map on page 1 for the VNA area.

We support much of the content of the draft PC14 section 14.6 Rules – High Density Residential Zone. However, those elements we have specifically identified in this submission are those for which we have significant concerns and seek amendment, removal, or replacement as proposed.

1. Background

1.1 Permitted activities section 14.6.1.1. No changes sought.

1.2 Controlled activities section 14.6.1.2.

1.3 Restricted discretionary activities section 14.6.1.3.

- RD7 requires buildings between 20m and 32m in height to have consideration of impacts on neighbouring property. However, RD7 (b) has no requirement for Council discretion to consider impacts on neighbouring property. However, the High Density Residential precinct does via RD8(b). There is little difference between the existing neighbours in this area, and those outside the precinct.
- RD9 states that applications for buildings that do not meet height in relation to boundary rules shall not be publicly notified, but say nothing about notification to those immediately affected, including neighbours.
- Similarly, RD10 relating to setbacks shall not be publicly notified, but say nothing about notification to those immediately affected, including neighbours.
- Similarly, RD13 relating to landscaped area and tree canopy cover shall not be limited or publicly notified, but say nothing about notification to those immediately affected, including neighbours.
- Similarly, RD 21 relating to the location of outdoor mechanical ventilation shall not be limited or publicly notified, but say nothing about notification to those immediately affected, including neighbours.

1.4 Discretionary activities section 14.6.1.4. No changes sought.

1.5 Non-complying activities section 14.6.1.5. No changes sought.

1.6 Built form standards. We note the advice notice 1 regarding the provision and availability of wastewater, storm water, and water supply infrastructure. We agree that proper provision needs to be determined before any new developments proceed and consider it helpful that this is spelled out in this plan change, as has been done.

1.7 Building height section 14.6.2.1. We support the specified height limit of 14m in subclause (a).

1.8 Height in relation to boundary section 14.6.2.2.

- In subsection (a), recession planes are defined by Appendix 14.16.2 Diagram D from points 3m above boundary ground levels. Refer to our comments 2.2 under Issue 2, which apply to this issue also.
- In subsection (b), recession planes would not apply where buildings are set back to the extent specified. Refer to our comments 2.3 under Issue 2, which apply to this issue also.
- In subsection (c), this standard does not apply to the construction of 3 or more residential units along the first 20 metres of a side boundary measured from the road boundary, or 60% of the site depth, whichever is lesser. **This could have a very significant adverse impact on neighbourhoods, for which we have not seen any comprehensive evaluation of effects.**

1.9 Setbacks section 14.6.3. No changes sought.

1.10 Outlook space section 14.6.2.4. No changes sought.

1.11 Building separation section 14.6.2.5. No changes sought.

1.12 Fencing and screening section 14.6.2.6. No changes sought

1.13 Landscaped area and tree canopy cover section 14.6.2.7. Refer to Issue 5.

1.14 Building coverage section 14.6.2.12.

- Subclause (a)(ii) allows an increase in site coverage to 60% when no vehicle parking is provided and other requirements are met (Subclauses B, C, and D). We have concerns regarding this provision for increased site coverage and have not seen any corresponding sufficient evaluation of effects.

2. Commentary

2.1 Restricted discretionary activities section 14.6.1.3.

- RD7 requires buildings between 20m and 32m in height to have consideration of impacts on neighbouring property only in the High Density Residential precinct. There is

little difference between the existing neighbours in this area, and those outside the precinct. We therefore consider that it is very much necessary to consider impacts on neighbouring residential neighbours within the high density residential areas including the precinct.

- RD9, 10, 13, and 21 state that applications for buildings that do not meet height in relation to boundary, setbacks, landscaped area and tree canopy, and outdoor mechanical ventilation location rules **shall not be publicly notified**, but say nothing about notification to those immediately affected, including neighbours. We consider that all of these issues are most relevant to affected neighbours and it should therefore be clear that notification is required to those neighbours so that they can have an opportunity to consider the environmental, social, cultural and financial effects on their homes.

2.2 Height in relation to boundary section 14.6.2.2.

- In subsection (a), recession planes are defined by Appendix 14.16.2 Diagram D from points 3m above boundary ground levels. Refer to our comments 2.2 under Issue 2, which apply to this issue also. Whilst we accept that what is proposed in PC14 is a compromise, we have yet to see a detailed evaluation of the proposed change relative to current planning requirements.
- In subsection (b), recession planes would not apply where buildings are set back to the extent specified. Refer to our comments 2.3 under Issue 2, which apply to this issue also. We can see no reason why the recession plane rules should not apply to taller buildings which, even when setback back, would result in dramatically increased shading of neighbours. We have yet to see a detailed evaluation of the proposed change relative to current planning requirements.
- In subsection (c), this standard does not apply to the construction of 3 or more residential units along the first 20 metres of a side boundary measured from the road boundary, or 60% of the site depth, whichever is lesser. **This could have a very significant adverse impact on neighbourhoods, for which we have not seen any comprehensive evaluation of effects.**

Our concern is that this exemption applied to one site could have enormous detrimental and threatening impact on direct neighbours, causing a domino effect of forcing neighbours from their property. A much more collaborative approach, which we would support, would be to allow such concessions on northern property boundaries only, or boundaries adjoining properties constructed to subsection (c) (see Appendix 14.15.2 diagram D), which would encourage the outcomes sought over time without intimidating current residents.

We have yet to see a detailed evaluation of the proposed change relative to current planning requirements.

2.3 Building coverage section 14.6.2.12.

- Subclause (a)(ii) allows an increase in site coverage to 60% when no vehicle parking is provided and other requirements are met (Subclauses B, C, and D). We have concerns regarding this provision particularly with regard to on-street parking overload. The combination of rewarding lack of on-site parking and increased site coverage will compound the demand for on street parking until suitable alternatives are well provided-for in our neighbourhood (including public charging of EV's). We have not seen any extensive evaluation of effects, but already are experiencing negative effects in our area (such as EV charging cables laid across footpaths and gutter channels).

3. Decision Sought

3.1 Section 14.6.1.3 RD7 subclause (b). Add under the Council's discretion column:

"b. Impacts on neighbouring property – Rule 14.15.3.c."

3.2 Section 14.6.2.2 (a) refers to Appendix 14.15.2 Diagram D. In the absence of any site-specific S32 evaluation of impacts for this site, add a new Diagram E for the HRZ zone which matches the current Plan recession planes being current Appendix 14.16.2 Diagram C (varying from 35 to 50 to 55 degrees, commencing 2.3m above the site boundary). Reference this change in section 14.6.2.2.

3.3 Section 14.6.2.2 (b). Delete all words from "unless" so that the clause reads:

"For any part of a building above 12m in height, the recession plane under a. shall apply."

3.4 Section 14.6.2.2 (c). Change subclause iv to read:

"the construction of three or more residential units of a maximum of 14 metres in height, to any part of a building;

A. On a northern site boundary as defined by Diagram D, and

B. On any other site boundary where the directly neighbouring building is already constructed to the full extent allowed by this section 14.6.2.2 (c), and

C. Along the first 20 metres of a side boundary measured from the road boundary; or

D. Within 60% of the site depth, measured from the road boundary, whichever is the lesser. For corner sites, depth is measured from the internal boundaries, that are perpendicular to the road boundary. See Figure 1, below."

3.5 Section 14.6.2.12.

Delete subclause A.

Topic 4: Central City HRZ Building Heights

1. Background

Chapter 14 HRZ <https://www.ccc.govt.nz/assets/Documents/The-Council/Plans-Strategies-Policies-Bylaws/Plans/district-plan/Proposed-changes/2023/PC14/Provisions/Plan-Change-14-HBC-NOTIFICATION-Sub-chapter-14.6-Rules-RCC-Zone-HRZ.pdf>

Maps https://www.ccc.govt.nz/assets/Documents/The-Council/Plans-Strategies-Policies-Bylaws/Plans/district-plan/Proposed-changes/2023/PC14/Maps/PC_14_CC_Zoning.pdf

And

https://www.ccc.govt.nz/assets/Documents/The-Council/Plans-Strategies-Policies-Bylaws/Plans/district-plan/Proposed-changes/2023/PC14/Maps/PC14_CCBuildingHeights_2023.pdf

14.6.2.1 Building height

HRZ High Density Residential Zone

This zone allows buildings up to 14m (generally 4 storeys) without resource consent and between 14-32m (4-10 storeys) with resource consent, depending on whether a commercial centre precinct applies.

This zone is mainly for residential buildings, including apartments.

The Sunlight Access Qualifying Matter applies to the entirety of this zone, with associated controls captured in 14.6.2.2 - Height in relation to boundary - of the zone standards.

14.6.2.2 Daylight recession planes Height in relation to boundary

c. rules do not apply if the boundary is a road.

The Property Economics report July 2022 page 33 states

Enabling greater heights may increase the level of residential capacity further, beyond the already sufficient levels, which could lead to an inefficient allocation of infrastructure and land resources as well as give rise to uncertainty as to the infrastructure need of areas.

2. Commentary

It is well known that CHC already has plenty of capacity for residential development and simply does not need to have additional height to enable capacity to meet the needs of growth.

Enabling additional height will simply make developers richer as they will enable in the highest yielding suburbs to the north of the city and ruin these areas for existing residents, this will force land prices up in these already higher prices suburbs. We encourage Councillors to look at what has happened in Auckland's better suburbs to understand the reality of what this enablement does. A study tour would be an awakening of the harsh reality of what the NPS-UD looks like when implemented.

In the VNA area (Bealey Ave to Salisbury, Montreal to Columbo St) we have narrow streets and small sections, and most streets with the highest levels of residential housing, run east to west. Enabling 14m (4 storey) or 20m (6 storey) or 32m (10 storey) being build right to the street boundary or indeed any boundary adversely impacts on existing houses on the southern, eastern and western side of the street due to the low angle of the sun, especially in winter. It seems unfair and discriminatory that residents living in central city streets will be more adversely impacted by Proposed plan changes in PC14 when compared to those living in medium density residential areas given recession plains do not apply to the first 20m of street frontage in the proposed HRZ under PC14.

Under proposed PC14 in the VNA area there could be buildings as high as the CHC Casino and Te Pae in the middle of established residential homes of 1 or 2 storeys creating a wall on the street that is out of place and inconsistent with good urban planning.

Set-backs and recession plains should apply regardless of the site boundaries including the street boundary to limit shading, wind tunnels, negative social, environment and economic impact on existing residents, and prevent poor urban design. This idea of developing to the street is fine if it's a new development and like for like for all houses in the same street, it simply doesn't work in an existing and established street where all other houses are set back based on previous planning rules.

Section 32 Appendix 34 Sunlight Qualifying Matter also states that the average road frontage in HRZ is 19.8m, whilst this may be true as an average it doesn't reflect the actual reality of many central city sites. **In the VNA area, many sections are less than 10m wide.** The access to direct sunlight to heat homes and encourage efficient, sustainable energy sources will be significantly compromised if a one size fits all approach is taken to enabled build heights in central city areas like the VNA which has a high volume of narrow sections that run north to south. Size of section, aspect, street width, recession plains need to be considered in HRZ such as the streets covered by the VNA to ensure good urban planning and the economic, social, and environment benefits of further densification. Adding across the board higher density by enabling 4 storeys in already high density without considering each site on its own merits makes no sense.

Enabling higher density by increasing height limits will also put added pressure on infrastructure that is already not able to cope with current demands and does not enable the CCC to plan for infrastructure future needs as it will be unclear as to where demand will be required. In the past two years Peacock Street has had 8 sub main water pipe bursts. The current water infrastructure is clearly not able to cope with existing load.

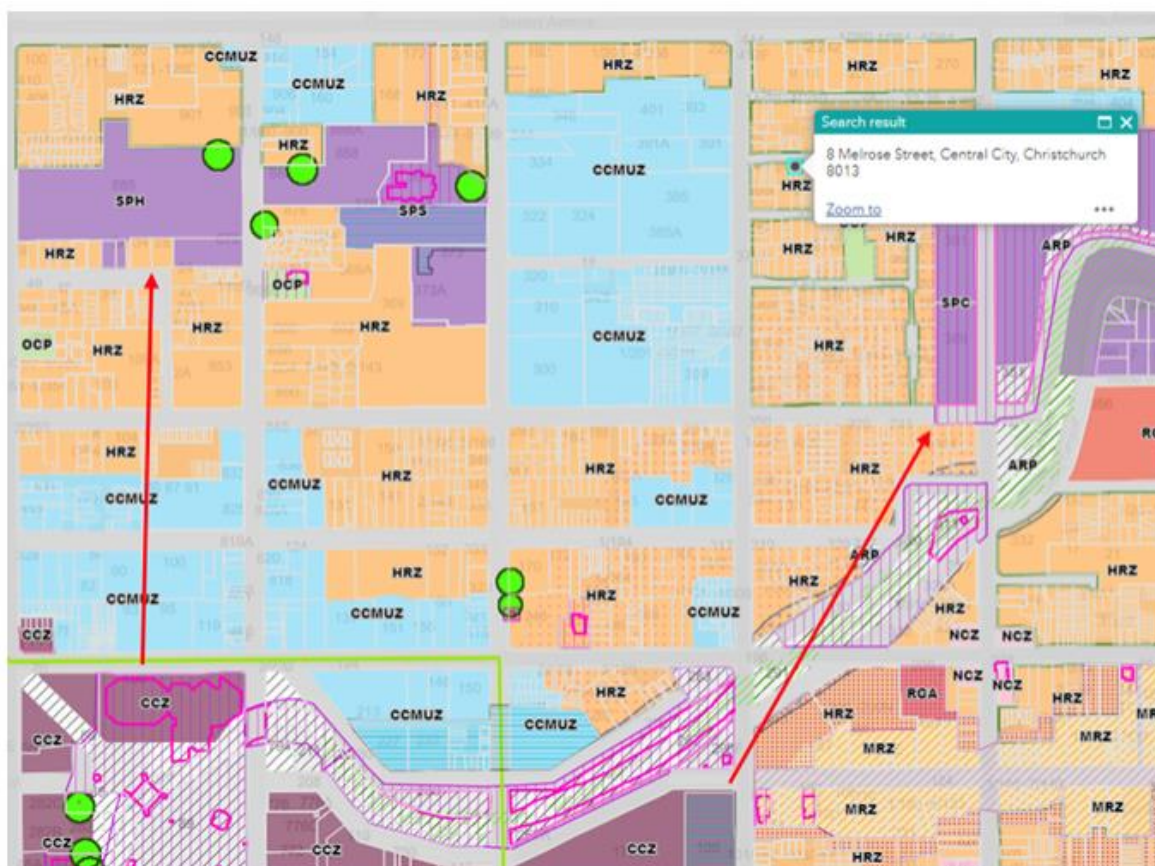
The needs of current residents, and those of generations to come living in existing homes, are being ignored for the hypothetical needs of a potential new population that is unknown. There is no need for additional housing capacity beyond what is already planned for within the central city. Under the current District Plan. If additional housing is required then it is obvious that this should be encouraged as high quality development on the South side where there is an abundant lack of housing but have access/walkability and proximity to services and amenity. Additionally, to the East there is already good capacity coming on stream, there is simply no need to over enable in established residential neighbourhoods within the four avenues.

Within the proposed HRZ PC14 also sets out that there will be areas zoned as HRZ Precincts, these precincts have a height limit overlay enabled of 14m vs HRZ of 20m refer to map

https://www.ccc.govt.nz/assets/Documents/The-Council/Plans-Strategies-Policies-Bylaws/Plans/district-plan/Proposed-changes/2023/PC14/Maps/PC14_CCBuildingHeights_2023.pdf

The delineation of where the HRZ Precinct starts and ends seems arbitrary and inconsistently applied. When questioned Council Planners explained why the Melrose St areas was covered under the Precinct, but not all of the streets in the VNA were by the following explanation:

The intensification is a response to Policy 3(c) of the National Policy Statement for Urban Development (NPS-UD), which is captured in the Residential s32 evaluation report under Issue 2. The limited extent of 10-storey enablement is largely due to economic reporting and accessibility assessments that supported limiting this extent to about one city block from the commercial centre (CCZ). The specific street-by-street location of this seeks to represent a consistent distance from the commercial centre, shown below in more detail with outward lines from CCZ:



The fundamental reason why Melrose is not proposed to be enabled to 10-storeys is due to it's proximity from CCZ.

It is clear to see from the above map that the delineation of boundaries of the CCZ is way too simplistic and blunt.

- The delineation for the CCZ is the Town Hall on Kilmore St which has very little amenity value for residents in the VNA, to get to services residents must walk around the Town Hall and through Victoria Square to access the city, yet this is not factored at all.
- The concept of having a tiered city and enabling taller building in the HRZ vs the HRZ Precinct on paper makes sense but then for the VNA we have CCMUZ in between with a height overlay of 32m whereas the East of the city does not. This CCMUZ provides the intended break between the CCZ

and HRZ we don't need two layers of tiering, therefore the precinct with a height limit of 14m should apply from Salisbury Street to provide a consistent approach as for the East/Melrose Street area.

Limiting housing choice: the PC14 headline the Council uses is to give people "greater housing choice." However, consider this: if all NZ tier 1 cities and their suburbs have the same Rules applied and the same enablement applied then this in fact removes choice of where people can and want to live. People choose their place (city and suburb) to with their life stage, lifestyle and the personal values that are most important to them. Every individual makes decisions based on what's important in their values set, vs what they can afford. The NPS-UD and subsequent PC14 in fact removes these choices as it treats all Central City Residential and all medium density suburbs the same thereby removing choice and applying a one size fits all to every suburb and every city. This removes people's choice and freedoms in choosing where to live.

3. Decisions sought:

1. Retain current District Plan Rules as permitted within VNA area given narrow streets, small and narrow sections, and the high density that already exists. Each new build needs to be assessed in relation to design and impact on neighbours. Having a one size fits all approach in this area is inconsistent with good urban form and social, economic and cultural wellbeing of the current residents.
2. Redraw the CCZ zone boundary to be the southern side of Victoria Square to be consistent with other CCZ boundary locations which do not include the park areas around the River Avon. The Town Hall offers very limited amenity and is an obstacle to go around for access to the city by people living in the VNA neighbourhood.
3. Retain the minimum of a 400sq m site to be able to subdivide, some sites that are 300-399 sq m are narrow being less than 8m wide – these are not suitable for subdivision.
4. Larger sites on corners that can accommodate current set-backs, recession plains and which will have limited negative impact on neighbours can still be enabled but the uniqueness of the site and impact should be assessed on a case by case basis thereby needing notified consent as they currently do.
5. Do not treat every central city area to be the same thereby removing housing choices for both existing and future residents, create areas that offer diversity of character and style rather than all central city suburbs being inflicted with the same ad hoc mash up proposed PC 14 enables. This is not delivering choice, it's restricting choice and character by making every city and every suburb the same.

Topic 5: Central City HRZ Zone: Landscaping, Trees

This feedback relates to the HRZ zone within the VNA neighbourhood area specifically, and wider areas of the city beyond that extent. Refer to the map on page 1 for the VNA area.

1. Background

Chapter 6: Tree Canopy Cover and Financial Contributions (6.10A)

The VNA **supports the provisions** for retaining, increasing and maintaining the health of Christchurch's tree canopy cover, set out in 6.10A and supported by the Section 32 Evaluation report (Part 7). We believe this is one way of addressing at least some of negative effects of intensification, acknowledged in the associated s32 report.

In particular, we **support, as written**

Policies 6.10A.2.1.2 and 2.1.3

Standard 6.10A.4.2.2 (Financial Contributions)

Landscaped area and tree canopy cover (14.6.2.7)

The minimum landscaped area can include the canopy of trees regardless of the ground treatment below them. This could result in areas of impervious surfacing being included within the required landscape percentage.

2. Commentary

We **submit** that in many cases the provisions need to be strengthened, a message consistent with VNA's submission on the Urban Forest Plan.

Furthermore, we do not consider that impervious surfaces below tree canopies should be included within minimum required landscape areas. Landscaping at ground level performs a function of allowing excess stormwater to percolate into the soils to help mitigate excess stormwater load to infrastructure, and should therefore not be reduced below the minimum designated percentage.

3. Decision Sought

In particular, we **request**:

- Include commercial/industrial sites in Strategic Objective 3.3.10 (a) (ii) E, Objective 6.10A.2.1, Policy 6.10A.2.1.1 and Standard 6.10A.4.1.1;
- Increase the minimum cover from 20% to 25% (6.10A.4.1.1);
- Discourage the use of impervious/impermeable surfaces;

- Increase the Financial Contribution per tree significantly as a disincentive to removing or not replacing trees on the development site;
- Rewrite the Matters of Discretion to make it less likely that trees will be removed or not replaced on site.
- Change section 14.6.2.7 to read:

“A residential unit at ground floor level must have a landscaped area of a minimum of 25% of a developed site with grass or plants and trees.”

Topic 6: Sunlight Access Qualifying Matter

This feedback relates to the HRZ zone within the VNA neighbourhood area specifically, even though the comments may be applicable to HRZ areas beyond that extent. Refer to the map on page 1 for the VNA area.

1. Background

Appendix 34 of the Section 32 reports describes the evaluation of the Sunlight Access Qualifying Matter.

We thank the Christchurch City Council and its planners for investigating this matter in detail. As acknowledged, the impacts of the latitude of Christchurch on sunlight access, impacting matters of environmental, social, health and cost, was not tested in the drafting of the Enabling Housing Act.

The matter was raised by the VNA in submissions in 2022, and we appreciate being heard on this most critical issue impacting both current and future residents of this city.

We note that the Qualifying matter applies only to MRZ and HRZ residential zones.

2. Commentary

We strongly support the application of a Sunlight Access Qualifying Matter to the MRZ and HRZ zones of Christchurch, for the reasons CCC have identified in the S77 evaluation within the Section 32 Evaluation Report, particularly identifying changes that are beneficial to the environment, energy efficiency, health, and affordability.

We note the high level of over-enabling of intensification under PC14. Therefore, we see this as a win-win-win scenario which both reduces the over-enablement, still provides much more intensification than is needed to meet demand projections, and improves the quality and affordability of the outcome.

Where identified elsewhere, we challenge the writers of PC14 to consider the shading defined by the proposal in this QM as an upper limit, seeking opportunities to enable the advantages of even more sunlight access provided the capacity for intensification still remains sufficiently within the demand. This approach will maximise the positive impacts of PC14.

3. Decision Sought

- 3.1 Implement the Sunlight Access Qualifying Matter as an upper limit of shading for development within zones MRZ and HRZ throughout Christchurch, and seek opportunities to enable more sunlight access where beneficial, and housing demand is still met.

Topic 7: Victoria Street

1. Background

Section 32 Part 2, Appendix 29 Lower height limits Victoria St and Cathedral Square

VNA support lower height limits for Cathedral Square, and oppose zoning of Victoria St and proposed height limits for Victoria St

Current PC 14 reference

<https://www.ccc.govt.nz/assets/Documents/The-Council/Plans-Strategies-Policies-Bylaws/Plans/district-plan/Proposed-changes/2023/PC14/Section-32-Appendices-1/PC14-Qualifying-Matters-Lower-Height-Limits-Victoria-Street-and-Cathedral-Square.PDF>

2. Legal Requirements

2.1.1. We consider that Council is not required to justify these lower heights as qualifying matters but are doing so for the avoidance of all doubt and to demonstrate a higher evaluation threshold. In doing so, the following requirements should be met to reflect the approach necessary for Qualifying Matters

3. Background to Lower Height Limits Victoria Street

3.1.7. The height limit in the Victoria Street precinct (from Kilmore/Durham Street corner) is currently 17m, contrasting with the 28m height limit in the wider Central City core. In the earlier City Plan, the height limit in Victoria Street was part of the 'Fringe' area and had a 30m height limit as oppose to the 40/45/80m limits in the core.

3.1.8. It is also notable that the District Plan's Central City core overlay excludes the Victoria Street precinct but includes the core Central City Business zone. The Core Overlay requires high quality urban design and active frontages

4. Importance/reassessment of Lower Height Limits

4.1.2. The Victoria Street precinct is distinct from the rest of the commercial core. It is a relatively narrow strip of Commercial Core zoning which projects to the north west of the core and is surrounded by residential uses. It has an established history of lower height limit provisions than the rest of the Commercial Core area and can be considered significantly separate from the main concentration of development in the City Core

2. Commentary

Refer to figures 4-5 below

It was excellent to see that Council as part of the proposed PC14 supporting documents go into considerable detail outlining the special precinct of Victoria Street, and Victoria Square. The VNA fully support the Council in recognising Victoria Street as a unique and special heritage component of the Christchurch landscape.

Victoria St is the subject of constant change and unclear role in the greater CHC plan – every year it seems to change, and every plan produced by Council reduces the character and specialness of this street incrementally to its detriment. It is constantly marginalised through inconsistent planning and distractions, rather than being enhanced through strong decision making in planning.

Victoria St was historically a key component part of the West Fringe (1995 plan) and included residential and small specialist retail and businesses including hospitality, printing, butchery, fish shop, ski specialist, antiques as well as commercial buildings and a service station.

As a result of the 2010/11 earthquakes where the CBD was destroyed, Victoria St became the pseudo entertainment area replacing the CBD unofficially, mainly due to the inability to redevelop within the cbd for some time. Post earthquake the zoning of Victoria St changed almost by accident in the 2019 plan as per the quote from Council planning, and was treated as part of the CBD with a height restriction overlay.

Post quake:

All permitted building heights were reduced with 17m applying to most of Victoria Street and 28m for the rest of the Central City Business Zone and the southern end of Victoria Street (refer to Map 3 of the Christchurch Central City Recovery Plan). There are also a number of other differences between Victoria Street and the rest of the Central City Business Zone, or parts of the rest of that zone. But to a large extent, I'd suggest this was the point at which Victoria Street became part of the CBD.

From the 2019 plan Victoria St became zoned as part of the City Centre but with a height overlay applied, and no longer considered as part of the city Fringe or Frame; and in the proposed PC14 Victoria St has again been zoned as CCZ bit with a Special Amenity of an overlay height restriction of 45m. vs CCZ of 90m in the central city.

In 2020-2021 Victoria St had a publicly funded (ratepayer) upgrade with the view to improve the streetscape, make it more pedestrian friendly and encourage outdoor use and reduce access of cars by widening footpaths, adding islands for safer pedestrian crossing, improved lighting and planting, and a 30km speed limit was applied.

Contrast this with CCC also now wanting Victoria St to be a main transport route for public transport and even has future proposals of light rail – which obviously flies in the face of the 2020 Council upgrade and thinking of a pedestrian friendly upmarket showcase of CHC retail and hospitality making it an attractive place for tourists.

Currently Victoria St is mainly long term business tenancies, high end retail and services such as interior design and architects, quality hospitality and most recently a brand new 5 star hotel, mixed with commercial mid-size businesses office space. The idea of making it a public transport thoroughfare is not in keeping with what the local residents foresaw when asked for feedback in 2020 on the then proposed upgrade. And now the CCC want to enable more than double the height limits in this area for the few sites that remain undeveloped. Yet again we see what is meant to be a significant landmark street in CHC being compromised through mixed messages and proposals in planning.

Victoria St bisects some of CHC's oldest streets with low rise residential with few original historic houses and buildings remaining (given the 2010/11 earthquakes destroyed much of the heritage that was recognised before the quakes). Few icons of CHC still remain such as the workers cottages on Montreal St, The rebuilt Carlton Butchery Building, and the Jubilee Clock Tower. As a city we must embrace what we have left and ensure the surrounding areas showcase this very scarce heritage.

The VNA has an active and engaged residential community who care for the neighbourhood and its history, we want the Council to stop constantly meddling with Victoria St and return it once and for all to what it

was and should remain as an attractive well designed North Fringe/Frame that is attractive to high value tourism and retail through quality design and planning.

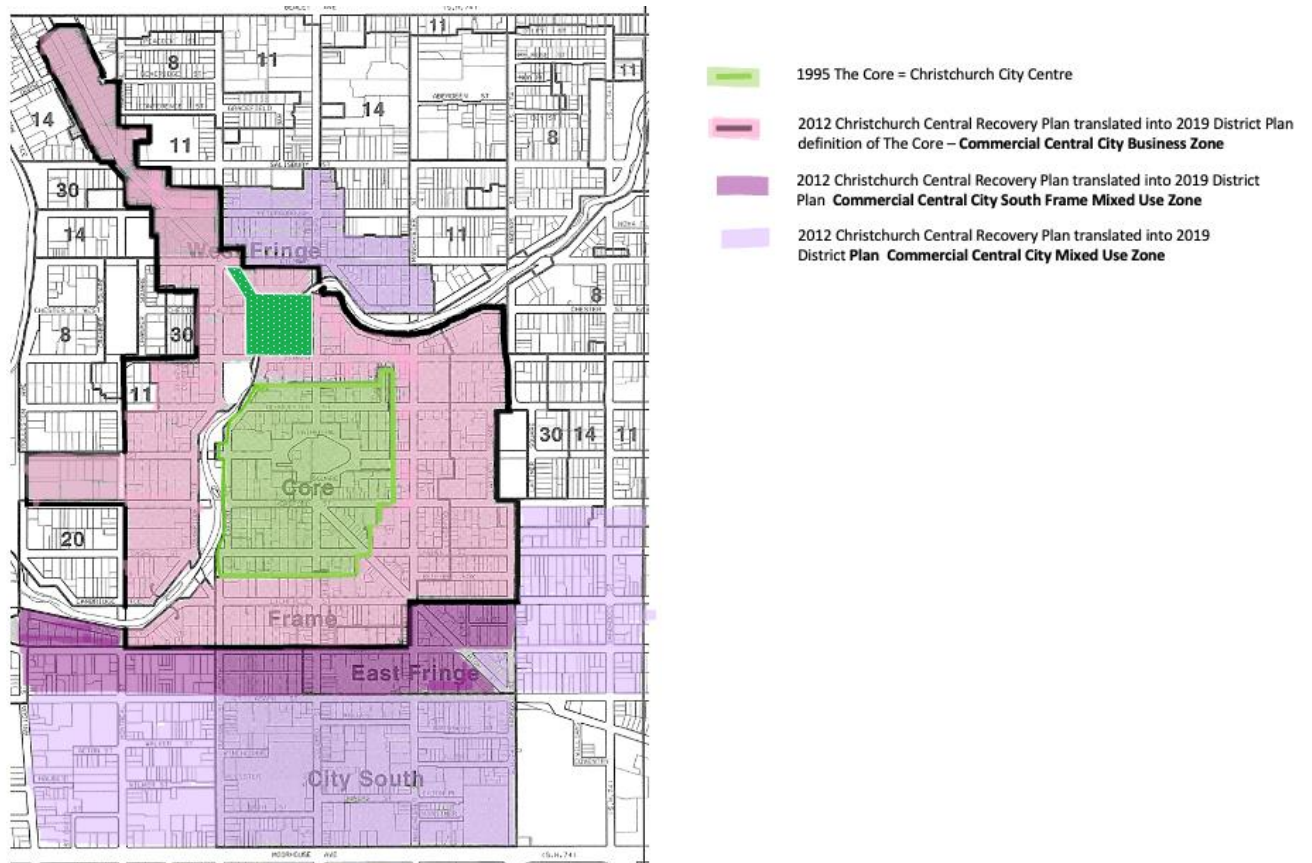
Given that PC14 is for all intents and purposes an exercise in totally rezoning all of the Christchurch area, we the Victoria Neighbourhood Assn (VNA) would like to see the Victoria precinct recognised for what it is, and have this embedded firmly in the District Plan going forward given it's more recent (post-earthquake) convoluted zoning and planning rules that seem to change without strategic thought. PC14 provides for Victoria St to have a qualifying matter which we support in principal as it is unique and should be treated as being differently to the CCZ and that is because it is clearly different and should never have been zoned as CCZ back in 2019.

3. Decisions sought:

1. The VNA wants the Victoria St precinct to be returned to being zoned as the North Fringe/Frame and treated the same as the South Frame zoned as CCMUZ with a 21m height limit. It makes no sense to have a "Frame" on the South side and not one on the North side of the city especially given the significance of the Victoria St precinct in the history of ChC's urban form. Victoria Street is simply not part of the Core/CBD/CCZ (call it what you will) it is a clear anomaly in the zoning from 2019 to today and it must be rectified given the city centre now is well on it's way to being rebuilt.
2. Stop considering Victoria St as a public transport thoroughfare. Traffic should be sent up Bealey Ave and then along Manchester St directly into the bus depot, rather than adding to noise and visual pollution in an area where outdoor dining and lingering shoppers want to enjoy. It makes no sense to spend millions of ratepayer funds on upgrading a street for pedestrians to then plan it as a public transport thoroughfare which ends in an already challenging and complex 6 way intersection being a Montreal, Salisbury, Victoria.
3. Retain a lower height limit at 21m to be consistent with the South Frame CCMUZ ensures that this area is used for what it was intended – high end destination retail, hospitality and tourist destination precinct embracing the scarce history that remains.
4. Finally within the Victoria St precinct there are limited sites that would be considered open for development therefore the net loss of additional capacity would be minimal and by retaining a lower height of 21m and rezoning it MMUZ and encouraging residential this would add to the diversity of this street in a positive way as it would encourage developers to include residential high value yields of high end residential development, which in turn will encourage retail in the precinct and not negatively impact the existing residential in the VNA area.

Figure 1

The Core from 1995 was significantly expanded in the 2019 Plan despite the clear articulation in the CCRP that the CBD was too large and needed to be compact. This expansion of the Core/CBD/CCZ continues to hamper the CHC recovery of the CBD

**Figure 2**

South side of CCZ (dark purple) and MUCC (blue and light purple) has no residential and yet has all the amenity and services (green). The CCZ proposed under PC14 retains the same footprint for the CCZ as used in the CHC District Plan 2019 and continues to include Victoria St.

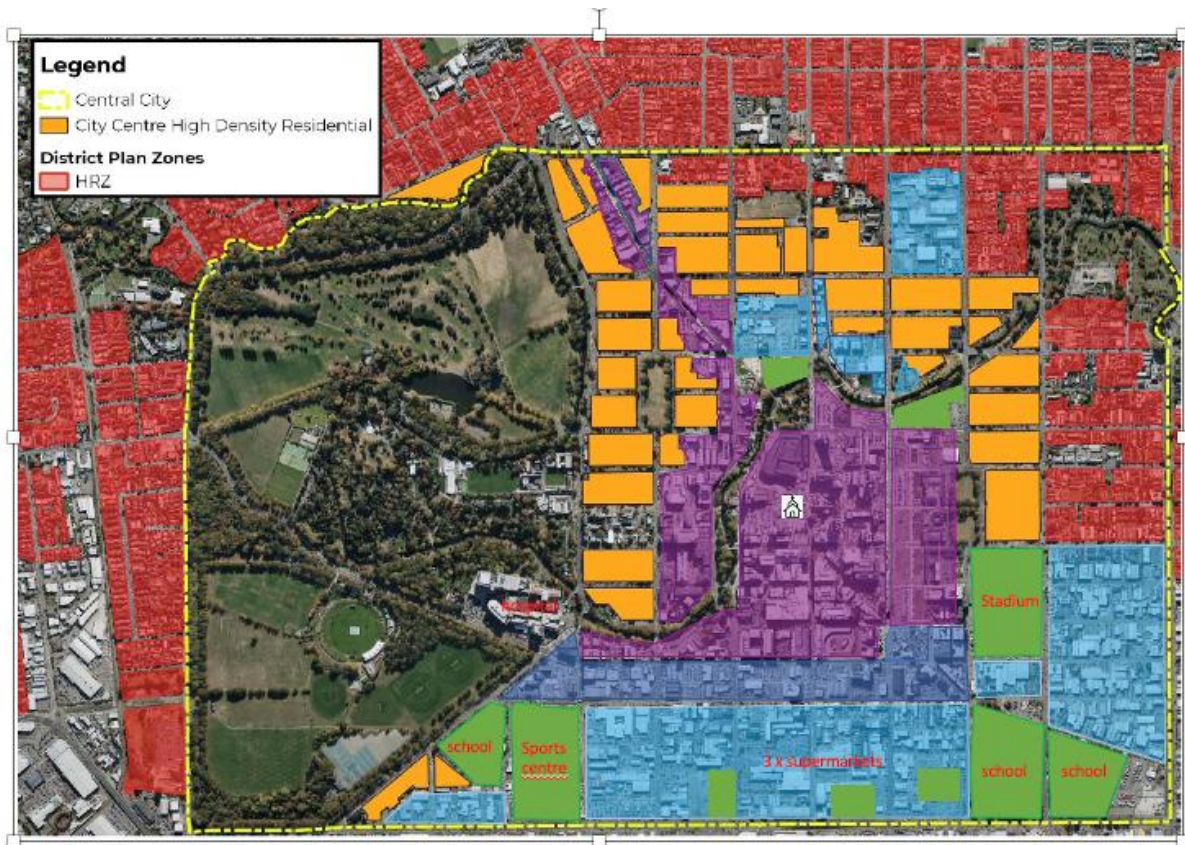
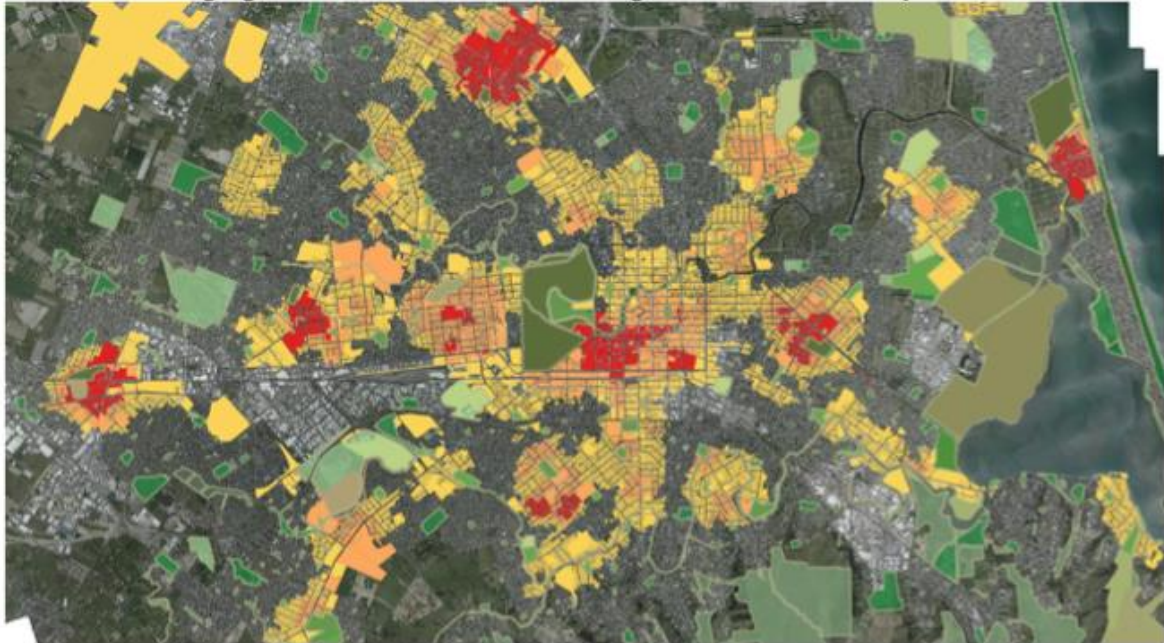


Figure 3

Locations that have the highest scores in the density enabler model shown in red.

The table below highlights those locations that have the highest scores in the density enabler model:



Locations with Good Accessibility Score of 20-24	Comments
Papanui	Considerable area, far wider than the existing RMD, particularly to the west of the centre.
Riccarton	Large area of orange zoning but relatively small red area. RMD only to the south of the centre currently. Accessibility is however equally good to both the north and south of the centre.
Hornby	The extent of area which is highly accessible is similar to that of the existing RMD and RSDT areas.
Linwood	Areas with highest accessibility are located to the west and north of the centre, similar to existing RMD area.
Central City	Areas with the highest accessibility are around the south of the central city area.
Barrington	Highest accessibility to the south of the centre, some in RSDT and some in lower density zoned areas.
Bush Inn	Significant area around centre, much larger than current RMD zone
New Brighton	Significant area around centre, much larger than current RMD zone

Figure 4

Heights: Victoria St PC14 zoned as CCZ with 45m height restriction overlay CCZ (dark purple) and MUCC (blue and light purple)

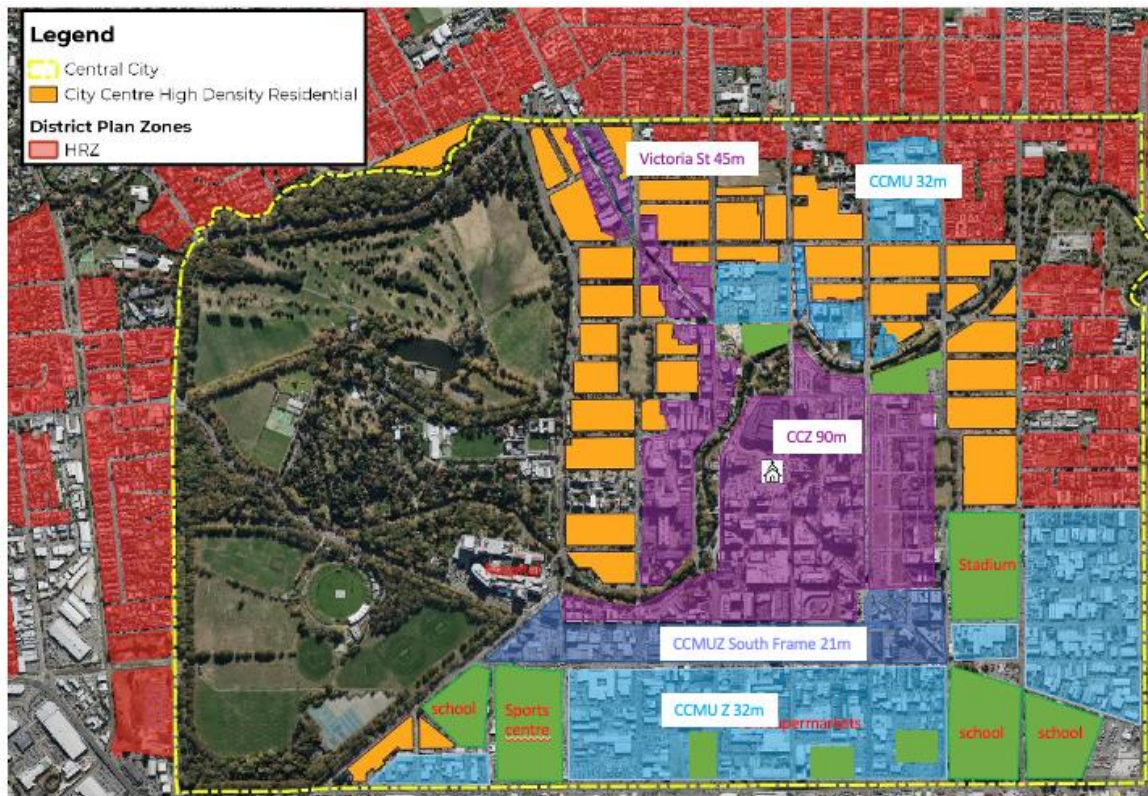


Figure 5

Showing the zoning that VNA would like to see changed for Victoria St as part of PC14 – the restoration of the North Frame/Fringe as shown in light purple which incorporates mixed use and a height limit of 21m to be consistent with the South Frame.

Topic 8: 90m Heights in Central City Zone

1. Background

It is understood that the CCC are required by the NPS-UD to intensify, but as the proposed PC14 stands it does not adequately consider and reflect the views of the people of CHC from the CCRP who clearly stated they want a low rise, green city. CCC have failed to acknowledge that this was a clear and demonstrable consideration in the proposed PC14, they have simply followed the economics of city design by promoting a 90m height for the city centre.

Maps

https://www.ccc.govt.nz/assets/Documents/The-Council/Plans-Strategies-Policies-Bylaws/Plans/district-plan/Proposed-changes/2023/PC14/Maps/PC_14_CC_Zoning.pdf

Commercial zone

<https://www.ccc.govt.nz/assets/Documents/The-Council/Plans-Strategies-Policies-Bylaws/Plans/district-plan/Proposed-changes/2023/PC14/Provisions/Plan-Change-14-HBC-NOTIFICATION-Chapter-15-Commercial2.pdf>

Whilst the CCRP has been revoked, “PC14 must still have regard to the directions of the CCRP under s74(2)(b)(i) of the RMA” (from Plan Change 14, Section 32 Evaluation; Housing and Business choice – Commercial and industrial sub-chapters evaluation report, 2.1.43). Those directions include statements like the following:

2.1.39 –Under the CCRP, the aim was “the overall design concept for development of a greener, more accessible city with a compact core, more greenspace and a stronger built density”. A central part of the CCRP was the concept of a ‘frame’ with there being three components, “each having its own distinct character and serving to contain the commercial area. It was considered that containing the available land area in this way would address the issue of too much development capacity...”

Somewhere between what the people of CHC wanted and the following district plan 2019, the “Core” of the city actually got larger rather than more consolidated. One key aspect of this was the “accidental rezoning” of Victoria St given the CBD was destroyed by the 2010/11 earthquakes. Refer to figure 1.

In addition to this the Property Economics report July 2022 clearly states:

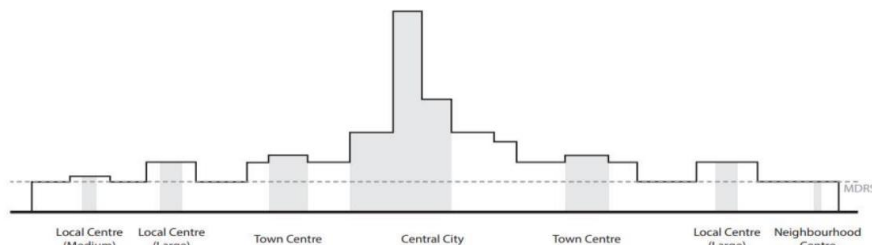
The extent of City Centre is vast and the liberalising of height enablement may not provide the impetus for intensified development as efficiently as consolidating height to identified, efficient locations within the City Centre. This cost can be mitigated by identifying specific areas within the City Centre for enabling more intensified development / taller buildings and having lower height enablement elsewhere in the City Centre to encourage further consolidation.

2. Commentary

There is no consideration in PC14 on what the people of CHC want and need, or consideration of the “Have your say” feedback and intent of the CCRP of a low rise, garden city with a consolidated core. Whilst the idea of a tiered city makes sense as per the diagram in its intent below depicts the extreme proposed height in the CCZ of 90m is without any robust justification other than a way to justify three storeys in the MDRZ.

Appendix 2 – Proposed relationship between building heights within centres and adjoining residential zones

Urban Form - Centres



The only rationale we can see for the 90m height limit is the Property Economics Report July 2022. This report recommends that the less limits on building height will encourage freedom to develop and higher yield thereby making city attractive to developers and that this, in turn, will signal that this is the city centre, thereby encouraging more development in this area. However the same report then goes on to say:

The probability of a large number of 90m+ high buildings being developed in Christchurch’s City Centre given the size of the city’s commercial and residential apartment market is considered low. and that the central city zone is vast.

Source: The Property Economics report July 2022

Add to this that there was no consideration in the Property Economics Report July 2022 report relating to demand trends in commercial high rise making this recommendation an academic exercise in planning to develop a tiered city scape to arrive at the MDRS of 11m in height. The report also acknowledges that it is unlikely that a 90m buildings will actually be developed and flies in the face of what the people of Christchurch want, yet the tier approach of the city design is predicated on a start enabled height of 90m.

The Property Economics Report July 2022 also fails to acknowledge current trends in commercial property development:

- The demand for high rise, larger footprint commercial office space is declining due to more people working flexible hours and working from home.
- The demand for smaller, more flexible floor footprints is growing, implying the demand for smaller buildings with greater services and amenity (eg gyms. bike parking).
- New Zealand business environment is made up of 97% SMEs, it is the SMEs that drive demand for commercial property and leases (Colliers research), not big business/corporates requiring large footprint spaces.
- Whilst vacancy rates for commercial were low in 2022 it is unclear if this trend will continue as build cost and interest rates rise – we are heading into a period of uncertainty for both commercial and residential demand.

The Property Economics Report July 2022 establishes that whilst larger corporates make up less than 20% of CHC's business community they contribute 70% employment. No doubt this is true, but one should not assume that that this 70% employment all need to work in the city centre given the move to flexible working and WFH which is here to stay. The assumption in the report is that these people will drive much needed foot traffic is flawed given market trends in workforce especially larger employers like call centres, and public service who embrace WFH to reduce costs in real estate. It would be better to encourage buildings in the CCZ that will meet the needs of SME's rather than large corporates to create a dynamic city centre that supports retail.

There is a solution between enabling and at the same time delivering to what the people of Christchurch want as a low-rise city, this would also fit with developers opinion that there is enough existing capacity in CHC and there is no need to go higher.

The desired urban profile could be achieved by reducing the maximum heights in all central city zones by at least 50% for now. This would still enable but without creating massive over enablement which comes with significant risk of creating a ghost town and making CHC highly unattractive for both residents and commercial.

The current boundary of the CCZ in the proposed PC14 also shows that the corner of Kilmore and Durham St and Victoria St is the start of the city. Post-quake CCC deliberately erected arches on this corner signalling the "gateway to the city" there are information boards telling you what these arches are. **A gateway into to the city cannot therefore be in the city (otherwise it wouldn't be a gateway)** A gang plank to get you onto a boat for example as a similar concept, where the gangplank is not the boat itself. A gateway to the city can't therefore be part of the city, the city must start beyond the gateway...surely? The boundary of the city centre should therefore be reduced to showcase and signal a compact core.

3. Decisions sought:

1. PC14 should consider and enable and encourage smaller businesses back into the city core by having attractive smaller buildings with high aesthetic and amenity, rather than old fashioned skyscrapers and encouraging a compact city to return vibrancy to the "core."
2. We would like to see the overall heights in the CCZ reduced from 90m to 45m. This in turn will better fit with heights in the areas designated as The Frame (21m) and CC Mixed Used Zones (32m) and HRZ (14m) at a height which would still achieve the tiered city design sought by CCC.
3. We would like to see the CCZ core reduced in size to encourage a compact core with the north and north west boundary returning to be the southern eastern corner of Victoria Square, and the North Frame reinstated from the Kilmore/Victoria/Durham St intersection. Refer to figure 5.

GENERAL FEEDBACK

Topic 9: Horizon of PC14 Changes

This feedback relates to the HRZ zone within the VNA neighbourhood area specifically, even though the comments may be applicable to HRZ areas beyond that extent. Refer to the map on page 1 for the VNA area.

1. Background

Chapter 3 clause 3.1 (c) (Strategic Directions) says:

“The Council must commence a review of the provisions of an operative district plan within 10 years of the provisions having last been reviewed or changed, meaning that this Plan is likely to have a life of not less than 10 years. Whilst certain parts of the district’s built environment will have been reestablished and aspects of peoples’ lives will have returned to normal within that timeframe, the district as a whole will still be in a state of recovery. In this Plan, therefore, the term “recovery” is intended to span the entire ten year timeframe, and in so doing facilitate the return to normality as quickly as possible, while also creating a strong platform for the longer term future of the district.”

Property Economic CBA (ex S32 Evaluation) Section 5, states that *“Property Economics understands that the current and anticipated future realisable capacity estimates commissioned by Council indicate sufficient levels of capacity for the city and for Council to meet its obligations under the NPS-UD. Property Economics also understands that the level of sufficiency is substantial and that minor losses, even of a cumulative nature, will likely not endanger the city’s ability to meet future demand.”*

2. Commentary

We consider based on this background that it is important that PC14 does not over-enable intensification, particularly as we have seen no detailed evaluation of the potential adverse consequences of enabling substantially more intensification than is needed. We have undertaken some limited research in the time available (eg Leipzig overcapacity) but we consider this needs serious, extensive investigation to properly understand and evaluate the possible social, health, cultural, environmental, and financial effects.

In the interim we recommend that PC14 enables only the extent of intensification needed to match the expected demands of the city, with an industry-recognised reasonable margin for unexpected additional growth.

3. Decision Sought

- 3.1 Evaluate whether the existing Plan can, without change, enable sufficient intensification for the needs of Christchurch without any change via PC14.
- 3.2 Agree to properly research and evaluate the effects of over-enabling housing development in a city such as Christchurch.

- 3.3 Maintain the existing bulk and location settings of the current Plan except where the MDRS requirements are mandated by legislation, provided this enables the required intensification, with a reasonable margin, for the next 10 years.
- 3.4 Review and adjust the Plan in 10 years' time for the next decade's needs.

Topic 10: Consultation Approach

1. Background

“A district plan is a document prepared under the Resource Management Act 1991 in conjunction with the community. “

2. Commentary

The ability for the community (general public) to be able to provide relevant and meaningful feedback in the consultation process for the proposed plan change 14 is flawed and not democratic for the following reasons:

- The public are not technically able to understand complex, specialised reports and to then meaningfully interpret what the proposed changes mean for them, therefore are not able to be in a position to provide solid feedback in the process of notifying PC14. The interactive map is used by Council as the key information for members of the public but this does not provide sufficient information for people to understand the impact on their economic, social and environmental wellbeing.
- There has not been enough time (6 weeks) for the public to be able to gather support and materials to suitably inform others of the implications of these proposed changes given the complexity and size of the reports provided by Council. There are well over a thousand pages to read and understand, and at times the information is conflicting, which requires technical expertise to fully comprehend. The timeframe of 6 weeks to be able to read, understand, gather input, synthesis and communicate to others is neither fair nor reasonable to be considered democratic.
- The public do not have a fair voice in the process of “consultation” that is in keeping with the social, economic and environmental wide-reaching impact that PC14 has on current residents’ lives, wealth, and the broader community well-being, there are no independent reports that clearly articulates these impacts and advocate for the current residents of Christchurch (CHC).
- Developers are at significant advantage to be able to gather and respond appropriately to this proposed plan change PC14 vs members of the public, again demonstrating that the “consultation” process is unfairly weighted against the public, who also make up the vast majority of stakeholders affected in these proposed plan changes.
- There is no social impact report available and no intention of undertaking one by Council. Not having this available for residents to be able to understand how these proposed plan changes will affect them is in polite terms enabling a lack of transparency. Council have gone to great efforts to provide economic reports on building heights to support their proposed plan but have not commissioned social impact reports claiming a lack of time. It’s noted that an economic report can be commissioned in time but not a social impact report, and this economic report hinted that there are significant costs of enabling height which include increased crime, congestion and vagrancy. It is also indicated in the Council’s commentary in Section 32 Appendix 34 Sunlight Qualifying Matter that access to sunlight is important for mental health, and yet for most residents PC14 will have a direct impact on access to sunlight unless existing recession plains are maintained. The public are unaware of the impact of these planning rule changes.

3. Decisions sought:

1. The consultation period is reset and given at least 9 months for the public to be able to provide submissions that the Council can use to enable well considered feedback, and for the voice of residents to be fairly and equitably represented.
2. The public are given a team of full-time experts and access to specialists paid for by the Government that represent the people of Christchurch. This is to enable and ensure a meaningful, and most importantly balanced conversation is had between both parties. Currently the CCC can use ratepayer money to commission expert reports that favour the brief that Council have given and the outcome that the Government want.
3. We want an independent social impact report where community representatives get to participate in the brief.

Without the above the process of “consultation” the current scope makes a mockery of our democracy as well as disables the CCC from representing the voice of its ratepayers – which is the primary function of the CCC.

Topic 11: Chapter 3 Strategic Directions

1. Background

The below references provide the context for our comments and what we seek to change. The exerts have been taken from documents, reports and references available to the public as provided by PC14 notification and supporting documents.

Maps

https://www.ccc.govt.nz/assets/Documents/The-Council/Plans-Strategies-Policies-Bylaws/Plans/district-plan/Proposed-changes/2023/PC14/Maps/PC_14_CC_Zoning.pdf

Chapter 3 Strategic Direction PC14

<https://www.ccc.govt.nz/assets/Documents/The-Council/Plans-Strategies-Policies-Bylaws/Plans/district-plan/Proposed-changes/2023/PC14/Provisions/Plan-Change-14-HBC-NOTIFICATION-Chapter-3-Strategic-Directions.pdf>

3.1 Introduction

The Council must commence a review of the provisions of an operative district plan within 10 years of the provisions having last been reviewed or changed, meaning that this Plan is likely to have a life of not less than 10 years.

and

Needs to consider the CHC Recovery Plan

<https://ccc.govt.nz/assets/Documents/The-Council/Plans-Strategies-Policies-Bylaws/Plans/central-city/christchurch-central-recovery-plan-march-2014.PDF>

1.3 Statutory Acknowledgements

1.3.1 The Resource Management Act 1991

A part of preparing a district plan, Council is also required under section 32 and 32AA of the Act to examine all objectives, policies and rules in its district plan to ensure they are necessary, efficient, effective and do not impose costs on the community that exceed their benefits. The Plan has been prepared in accordance with this requirement and the costs and benefits of each provision have been assessed. The evaluations prepared under section 32 and 32AA² are not part of the Plan itself, but are available on the Council's website at: <http://proposeddistrictplan1.ccc.govt.nz/background/section-32reports/>

1.3.2 Integration of the District Plan with Other Plans and Documents

The CER Act conferred powers on the executive to achieve the full social, economic, cultural and environmental recovery (in its widest sense) of Greater Christchurch. Recovery is defined in the CER Act as

including "restoration and enhancement". Rebuilding is defined to include "extending, repairing, improving, subdividing, or converting any land, infrastructure, or other property; and rebuilding communities."

1.3.3.2 Recovery Strategy for Greater Christchurch – Mahere Haumanutang

The Recovery Strategy states that the recovery of the built environment will leave the greatest legacy. Decisions made during the life of the Plan about urban form, investment in infrastructure, and resource consents for activities and buildings that should have a life extending many decades or more, will all influence the long term sustainability of the city, and the health and wellbeing of residents. The Recovery Strategy for Greater Christchurch can be viewed at:

<https://ceraarchive.dpmc.govt.nz/documents/recovery-strategy-greater-christchurch>.

A Liveable City He tāone e whai wāhi ai te whānau includes provisions to enable the centre of Christchurch to be a highly desirable place to live for people who seek an urban lifestyle.

1.3.1 Objective - Enabling recovery and facilitating the future enhancement of the district

- a. The expedited recovery and future enhancement of Christchurch as a dynamic, prosperous and internationally competitive city, in a manner that:
 - i. Meets the community's immediate and longer term needs for housing, economic development, community facilities, infrastructure, transport, and social and cultural wellbeing; and
 - ii. Fosters investment certainty; and
 - iii. Sustains the important qualities and values of the natural environment.

Section 32 Part 1, Appendix 1, Page 9

In conclusion, this housing capacity assessment and the assumptions contained within it, including StatsNZ projections, are only a point in time and consequentially some caution placed on reaching a fixed view on demand, particularly over the longer term.

3.3.89 Objective - Revitalising the Central City

1. The Central City is revitalised as the primary community focal point for the people of Christchurch; and
2. The amenity values, function and economic, social and cultural viability of the Central City are enhanced through private and public sector investment, and
3. A range of housing opportunities are enabled to support at least 5,000 additional households in the Central City between 2012 and 2028

2. Commentary

- It is clearly acknowledged that the people of Christchurch (CHC) in the Christchurch Recovery Plan as a result of “Have your say” input by the people of Christchurch, want a low-rise garden city with a consolidated core. The wants of the people of CHC are not respected in the current proposed PC14 which is enabling 90m tall buildings and extending the Core (CCZ) from what it was pre-quakes.
- PC14 creates a cost to the community through poor and inconsistent planning which enables oversupply, creating uncontrolled and adhoc building in the middle of residential streets especially in central city HRZ where the impact of poor design is likely to be significantly more damaging given existing small plot sizes for most. The CCC already acknowledge, as does the Property Economic Reports (July 2022) that sporadic and inconsistent building heights is not considered good urban design. Both organisations acknowledge this for the CCZ yet don’t appear to acknowledge this is also true for central city residential design such as within the proposed HRZs under PC14. Having a 6 or even a 4-storey building built right to the pavement in a street where all other houses are 1 or 2 story and a 5m setback is not good urban planning and is a cost to the community through lack of light and sunlight and therefore a devaluing of their residential asset, which in turn impacts on their ability to fund their retirement. We understand that the CCC are required under the MDRS -UD to enable “as much as possible” but this should not be at the cost of the community and their social and cultural wellbeing, which it currently is. And the definition of “as much as possible” is being taken in isolation of all other considerations of the NPS-UD and RMA.
- The CCC have taken a very literal and simplistic view of the Act and simply enabled as much as they possibly can, which is at the detriment of social, environmental, economic and cultural well-being **for the existing** residents of CHC and those resident for the life of the current housing stock which could be for several generations. The Council have not thought how they can enable as required by the Government and yet still meet the needs of the people of CHC, now and in the future, by enabling residential housing in the central city in a planned and control manner that meets good urban design without a cost to its residents for generations to come.
- It is noted that *3.3.1 Objective - Enabling recovery and facilitating the future enhancement of the district* takes priority in developing the District Plan however the proposed PC14 doesn’t consider all of these aspects, in particular does not meet the needs of the EXISTING people of CHC - it is heavily skewed towards a hypothesis of future citizens of CHC, whether they come or not. In doing so, it also does not acknowledge the impact on residents of a transition period of several generations to come.
- It is too easy to enable in areas that are already enabled and ruin an existing community for a potential future residential community that may never come. There appear to be many assumptions being made such as immigration to fill apartments/units and aging population being happy to live in higher density, high rise (where there is little or no garden) which seem rather misguided and high risk.
- The current central city residential area in Christchurch consists of old streets and old sites, (originally for small workers cottages), many residential sites in within the 4 Avenues are therefore very small (often less than 300 sq m). It is inappropriate to enable 4-6 storey high buildings in areas without ruining the economic, social and cultural aspects of the existing community including loss of sunlight, privacy, noise pollution, inability to efficiently use passive heating, inability to grow own fruit and vegetables parking congestion, loss of value in their property and negative impacts on mental wellbeing to name some of the obvious costs. These are all costs that will be borne by both the existing and future residential communities living in current central city residential zones. It seems not equal consideration to all peoples’ social and cultural needs are being treated with equal consideration in PC14, as it favours the needs of a selected future resident in a new building that

may never come, and whose who now and in future occupy existing homes and whose needs could be quite different to what is being enabled.

- There is plenty of opportunity to enable new HRZ housing within the CHC central city without only focusing on going higher and intensifying even more in the existing residential areas. For example: the VNA neighbourhood currently has a density of 150 households per hectare and with an average section size of 400-300m sq. There exists at least 7 hectares of land on the south side of the city that has zero households per hectare and which is zoned for mixed use. This land could be enabled for HRZ if the CCC were to think more strategically about how to actively encourage more housing the in central city AND meet the needs of the demand without over enabling, thereby also meeting the needs of the existing community AND have an excellent outcome in urban planning. The development of the South Frame in the CCRP has not moved forward in any way to make the South side of the city an attractive place to live, work and play all within 500m of the CBD.
- There could easily be over 2,000 households enabled within this CCRP central city area if development for residential were to be actively encouraged by rezoning, or offering incentives, and actively discourage further density development in existing central city residential already densely developed. By doing this CCC would be proactively and meaningfully participating in the role of urban planning and signalling that the south side is where they want development. Without Council actively managing this opportunity for residential development as they did for the East frame, developers will continue to do small infill developments based on yield alone, which will not deliver the right outcomes for the city and its residents in relation to urban planning. Refer to Figures 2 & 3 which clearly show that the CHC central city is very clearly unbalanced with all the residential on one side (north) and all the services on the opposite side (south). You can't shift the amenity, but you can develop houses, which is what the Gov't is asking for.

3. Decisions sought:

1. We want the Council to incentivise and deliberately enable in areas of the Central City that can allow for good design and currently have little or no residential housing or existing neighbouring homes. This being for example the 7 hectares of land currently being used as new and used car sales yards are that are all within the Central City, have the best services and amenity and are within 500m walkability within the CCZ. This area mainly is captured in the boundaries of Tuam, Antigua, Durham St Sth and Moorhouse Ave.
2. We request that the CCC look at demand for central city housing in a phased approach (looking 10 year horizons) and in a way that considers that social wellbeing of existing communities first and foremost. Do not over enable by providing too much capacity all at once when you are not actually being asked to do so by the NPS-UD particularly in the central city.; and there is plenty of land already available which is a view supported by developers.
3. We want strong direction to be given to developers by CCC as to where to develop to build a better Christchurch, it is too easy for developers to develop what is already developed given known retail pricing and values, which encourages development in high value suburbs for a small gain in additional housing vs CCC incentivising new areas of high density development to open up to balance the current inequitable use of land within the CHC Central area. This is evident in the REINZ report showing highest activity in high value and enabled suburbs - this is exactly what happens when developers are set free to do what they want. The attractive areas get further developed

leaving other areas untouched. This simply pushes prices up higher as we have already seen happen in recent years. The vast majority of developers seek profit pure and simple especially those that are the most active in eg. Williams Corp.

<https://www.ccc.govt.nz/assets/Documents/The-Council/Plans-Strategies-Policies-Bylaws/Plans/district-plan/Proposed-changes/2023/PC14/Section-32-Appendices-1/Technical-Report-REINZ-Housing-Market-2021-VERSION-1.PDF>

4. Any new residential development within existing HRZ and HRZ Precincts be held at 14m height limit and with current recession plains (status quo); any further height enablement be considered but only with a notified resource consent and neighbourhood input. By doing this any new development is considered on the unique merits of the site and impact on the neighbouring property and neighbourhood, width of the street, width of section, consideration of urban design, infrastructure, and the impact on the existing community's social, economic and environmental and cultural wellbeing.
5. We want the Council to **incentivise development in the area to the South** of Tuam Street through to Moorhouse Ave where there is an obvious lack of housing and very obvious accessibility to amenity and services and walkability. Refer Figures 2 & 3.

Topic 12: Oversupply

1. Background

3.3.1 Objective - Enabling recovery and facilitating the future enhancement of the district

Section 32: Part 1 Appendix 1, p.3:

“The enablement achieved through the recently legislated Medium Density Residential Standards and application of Policy 3 of the NPS-UD is significantly greater than reported under the 2021 Greater Christchurch Housing Capacity Assessment.” [the figure of 60,700 excess in Table 4, A.1]

“ensuring that the District Plan has capacity to accommodate a minimum of 55,950 additional dwellings by 2048;”

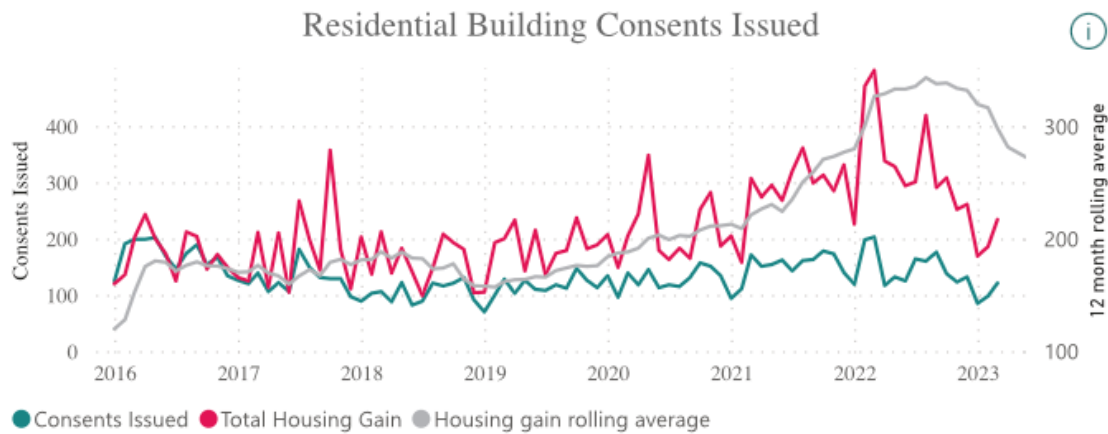
2. Commentary

The premise that there needs to be significantly greater housing in the central city is flawed. Council research indicates that this is not where people want to live, there have been numerous Council research studies of residents that keep saying the same thing – most people do not want to live in the city centre.

Residents and developers do not want nor think there is a need for enablement through height as there already exists plenty of capacity in Christchurch, in fact it is widely believed we have too much capacity. The NPS-UD over enables and Council need to manage supply so as not to negatively impact the city of Christchurch or propose a plan that costs the community through negative impacts whether these be economic, environmental or social.

The current number of household in CHC is estimated at 163,000, therefore adding 56,000 households by 2048 brings the number of households to 219,000, this enables a population of 525,600 ppl based on 2.4 ppl per household. Yet Stats NZ population medium expectations to 2048 is 463,500*. The current PC14 plan over enables by 62,000 ppl or 26,000 houses.

Current growth of housing has slowed drastically and the growth trend is quite different to the time of the MDRS was developed by central government. This is especially true in CHC as the below Council stats show in terms of housing consents driven by market factors of supply and demand. There are numerous reports in media that the likes of Willams Corp can't sell their units and are letting them out, and the trend of investors purchasing and renting as Air BnB continues for small inner city units such as those in the East Frame.



Source: <https://ccc.govt.nz/culture-and-community/statistics-and-facts/built-environment-reporting/>

In the next ten years Stats NZ* predicts less than 1% population growth in CHC. Stats NZ also shows a considerable change in the age of the population; by 2048 with 60% of the Christchurch population aged 25+ will be over the age of 50. This impacts the type of housing required, and it is unlikely that this older generation will want to live in inner city apartments and houses with stairs and without a garden. Therefore, adding too much density through height is not meeting the future needs of the aging population demographic for Christchurch central city in terms of multi-storey developments, unless of course they are assisted living residents.'

*Source: <https://figure.nz/chart/CLaMLJ4sqPsSQMCU-YrMDF0zWjNHR4fB>

Livingstons and Associated Limited prepared a research report on housing demand and need to support the 2021 Greater Christchurch Housing Capacity Assessment. Source: <https://www.ccc.govt.nz/assets/Documents/The-Council/Plans-Strategies-Policies-Bylaws/Plans/district-plan/Proposed-changes/2023/PC14/Section-32-Appendices-1/PC14-S32-Part-1-Appendix-1-Updated-Housing-Capacity-Assessment-14-March-2023.pdf>

The report states that demand is likely to be strongly focused on standalone dwellings with renters having a slightly higher propensity to live in multi-unit dwellings, therefore the focus of residential development should be focussed on standalone dwellings and not in high rise apartments/townhouses in the CHC central city.

Council research* 2022 reveals that 62% of respondents said they would not consider a move to live in the city under any circumstances, and of those that would consider living in the central city most were under 24 years old. This same research tells us that two most important factors for people liking the idea of city living is access to sun and privacy.

Research indicating potential demand, and the proposed PC14 plan seem to be unrelated. The oversupply of central dwellings will lead to AirBnB investors (not residents) and a ghost central city and at worst central city slums.

*Source: Life in Christchurch survey 2022: <https://ccc.govt.nz/the-council/how-the-council-works/reporting-and-monitoring/life-in-christchurch/central-city/>

The obvious question therefore is who exactly is the Council enabling housing for in the central city?

The aging population don't want apartment inner city living, students are likely to want but will not have the capability unless we build hostels, migrants may not want as Chinese, Pacific Island, Indian (our greatest immigration source) often live in larger households that are intergenerational. Is our immigration policy going to change to attract people from Europe who are very accepting of apartment living? This is unlikely.

Throughout PC14 the Council and other reports often state that the current District Plan allows for the appropriate level of housing and acknowledges that the implementation of the MDRS -UD over enables housing supply. Is this over enablement a deliberate and forced decision by central government seeking to bring down the price of housing across all of NZ, without current homeowners realising what is actually going on as it will appear to be “market forces” at play? There are many factors that have led to NZ’s over inflated house market, key factors being the duopoly of building suppliers and the highly restrictive residential housing standards – these are long standing issues that have been avoided by successive governments over the past 30 years. Supply of land is not the only issue and this should be recognised by not inflicting a blunt instrument of government interference in market forces of supply and demand to bring housing prices down by deliberately forcing an oversupply in the market, and compromising the integrity of the Council to meet the needs of their community. We also question that building higher reduces cost. We have not seen any clear evidence that this is correct in the context of Christchurch construction requirements. The Governments current monetary policy is already doing the job to cool the over inflated market, there is no need for further interference in what is meant to be a free market.

3. Decisions sought:

1. Reconsider how much enablement is required in the central city and do not enable more than is actually required, especially in areas that are already zoned residential and have relatively high density already.
2. Take a staged approach so enable high quality urban design through planning. The District Plan needs to be reviewed every 10 years, whilst having a vision of 30 years is good don’t enable for 30 years in one go given the uncertainty of the world and housing demand - the fluctuations of the last 3 years have taught us that we must plan for flexibility. So do that as a minimum.
3. We want the Council to open areas of the city that are not being well utilised. And have greater access to walkability, services and amenity – this being the south side of central Christchurch city. CHC has plenty of space in the central city already (it’s “vast” according to Property Economics report July 2022),
4. Do not over enable through height - all research indicates there isn’t demand for high rise, and it’s not wanted by residents and developers, costs more, and has adverse environmental and health effects.
5. Do not simply add more height to existing central city residential zones which encourages poor infill development (driven by profit not human need) and encourages investment purchasers who then rent out to Air BnB visitors, creating more problems (such as parking congestion).

Topic 13: Density and Services – An Unbalanced Central City

1. Background

Section 32 Part1, Appendix 1 page 11 Table 4.1.2

This table outlines density per hectare under proposed PC14 zones and shows at the highest level of intensity for high plan enabled scenarios. It shows the high end of HRZ being at 150 households per hectare.

Zone Group	Zone Type	15	30	45	50	80	90	100	120	150	200	250	300
Commercial	Local centre		*	*	*	*	*	*					
Commercial	Neighbourhood centre		*	*	*	*							
Mixed Use	Central City Mixed Use				*	*	*	*	*	*	*	*	
Mixed Use	Central City Mixed Use Zone (South Frame)				*	*	*	*	*	*	*	*	
Mixed Use	City centre				*	*	*	*	*	*	*	*	*
Mixed Use	Future Urban	*	*		*	*	*	*	*	*	*	*	
Mixed Use	Mixed use							*	*	*	*	*	
Mixed Use	Town centre					*	*	*	*	*	*	*	
Residential	High density residential				*	*	*	*	*	*	*	*	
Residential	Low density residential	*											

2. Commentary

The area that the VNA sits within already has ~150 households per hectare – this area does not need to be intensified further in the foreseeable future, whereas on the South side of the city there are 7 hectares of land currently being used to sell (mostly new) cars all within 800m of the Christ Church Cathedral. These 12 car sales yards have ZERO residential housing but could enable over 2,000 residential dwellings (ave 100 sq m) assuming CCMUZ of 21m (6 storey) 60% coverage. Currently this area has very few trees so converting to residential use will also enable trees and landscaping to enhance city centre, and reduces the number of cars in the city. These objectives meet all of the Gov't and Councils city planning objectives and yet nothing continues to be done to drive these car yards out of the central city. This is currently an appalling waste of high utility land.

Furthermore, development of intensified residential homes in this area can be done in a much more integrated manner with larger sites, and no current residential neighbours.

Add to this already compelling rationale is that this area to the South of Tuam Street has much greater services, greater walkability and greater amenity than anywhere else in the 4 avenues/central city and the Council reports already acknowledge this as a fact. Refer to figures 2 & 3.

For residents in the VNA to walk (one way) to the nearest large supermarket is 2.2km to New World Durham St or 1.5km to Fresh Choice Merivale. **The northern residential central city has all the houses with no services, yet the southern side has all the services (schools, sports centre, shopping, entertainment, cafes, medical, churches, parks), and no housing.**


3. Decisions sought:

1. Do not further intensify the residential area currently located between of Bealey Ave to Salisbury Streets and between Colombo and Victoria St. There is already a diversity of types of dwellings (probably the most diverse in CHC) and we are already at high density with less amenity.
2. Actively encourage and incentivise residential development in the South and Southern East of the city where there is greater access to services and very low levels of residential housing.
3. Put in place a plan to encourage removal of the 7 hectares of car yards from the city centre to create the opportunity for what was meant to be developed in these areas as part of the CCRP to create the city that the people of CHC want. If the Gov't want intensification, then hold the Gov't to account for their side of the bargain as they were the entity that failed to encourage the car yards to relocate out of the CBD in CHC.

Our proposed Housing and Business Choice Plan Change (14)

[Submitter Details](#)**Submission Date:** 30/04/2023**First name:** Thomas**Last name:** Calder**Preferred method of contact** Email

Attached Documents

Name	
Submission 2023	

Submission on Proposed Plan Change 14 to the Christchurch District Plan

Submitters: Thomas and Jenny Calder

7 Desmond St

Christchurch 8014

Our submission is that:

We are extremely concerned by the impact of the proposed rezoning to High Density Residential, on the character and coherence of our neighbourhood at Helmores Lane, specifically the area consisting of Helmores Lane, Desmond Street and Rhodes Street (to Rossall Street) (**the Area**). Owners and occupiers of these properties, ourselves included, have come to this Area to enjoy the amenity that the neighbourhood offers and have invested heavily in securing their properties. These property owners highly value the existing environment and the benefits it provides in terms of pleasantness and lifestyle. Previously, that character had been acknowledged by the identification of the area as a special amenity area (SAM8). It is worth noting that a number of private and commercial shuttle tours come into the area to enjoy the trees and architecture.

It is accepted that the Area has been subject to some residential re-development over the years, especially since the Canterbury earthquakes, nevertheless it has retained a sense of character and coherence that, we consider, is somewhat unique. It has a relationship to the Avon River and to the parklands beyond, which are part of, and provide a link to the rest of, Hagley Park. It has remained an enclave of relatively spacious residential dwellings that has also enabled the retention of many trees (including significant specimen trees) both within the streetscape and within private properties. There are protected trees that were worked around prior to and in the rebuild after the earthquakes. This was at considerable expense and inconvenience to some landowners.

There are also heritage items within the Area that have been identified in the proposals for PC14. These items, including some of the surviving older residences, are an important part of the overall character of the Area. Changing the area around these items would remove their context and impact on their heritage setting.

The inclusion of this area as a High-Density Residential zone threatens to destroy this character and the coherence it provides. This is not simply a question of land values. There is much to be valued in living in an area with its own character and a sense of coherence that we seek to preserve.

Some might say that the change in zoning does not impact on this situation as the coherence will be maintained by existing landowners. This is arguable at best and in the case of the Area, overlooks that the changed zoning would itself change the equation for landowners and, more

importantly those who might succeed them. The character of the Area is, in part, based on the longevity of ownership, which naturally means that changes in ownership can happen because of succession amongst other reasons. Newer owners, less invested in the character of the Area, would be free to take advantage of high-density status and, what is feared is a domino effect once the character that makes the Area so valuable to many, begins to be lost.

In addition, we note that there may also be further constraints to High (or even Medium) Density development in the area, which is identified as TC3 land and much of which is also in the Council's own Flood Plain overlay. That is not to mention potential parking issues that would likely be created if there was a proliferation of High Density accommodation.

We acknowledge that this may not be the only area in Christchurch that holds these fears. We are firmly of the view that such views should not be unnecessarily discounted, where they can be justified.

Within the framework that the Council has chosen to give effect to the new Medium Density Residential standards and the National Policy Statement on Urban Development, we consider that there is the ability to protect what is special about this area by:

- Rezoning the area Medium Density, and identifying the Area as a Residential Character Overlay Area, with the applicable rules (as attached): or
- Rezoning the area Medium Density and imposing a further change to the qualifying matter allowing access to sunlight by making the recession plane 45°, rather than 50°, from 3m at southern boundaries: and/or
- Providing that southern boundary neighbours can be notified if resource consents for height or access to sunlight non-compliances.


There may be other ways to reduce the impacts on character of the intensification changes which will become apparent and which we would like considered, but the key is that we think there is a need to protect the existing character. Having it identified as a Residential Character Area appears the best way, but if that is not possible, reducing the extent of any permitted intensification should be explored. At the very least, this area should not be zoned high density.

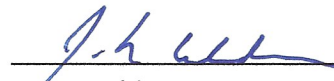
We seek the following decision from the Council:

- That Helmores Lane, Desmond Street and Rhodes Street (to Rossall Street) be identified in the Christchurch District Plan as a Medium Density Residential zone and a Residential Character Overlay Area and be made subject to the rules that apply to Residential Character areas: or,

- If Helmores Lane, Desmond Street and Rhodes Street (to Rossall Street) are not included as a Residential Character Area, that the Area be zoned Medium Density Residential: and,
- That sunlight access be better protected by further amending the medium/high density southern boundary recession plane to 45° from 3m at the boundary: and,
- That neighbours along the southern boundaries of any proposed developments that involve non-compliances with height or access to sunlight rules *can* be notified of the required resource consents and to make submissions.
- Any further or other decisions that achieve the outcomes sought by this submission, or are required as a consequence of the relief we seek.

Dated: 3 May 2023.


Signed: Thomas Calder
Dated: 30 April 2023


Jenny Calder

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 30/04/2023

First name: Kathleen

Last name: Crisley

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 6 General Rules and Procedures

Seek Amendment

I seek the following decision from the Council

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

Please clarify the impacts on neighbouring properties for sunlight access if a building is set back, as noted, at various heights above 12 metres.

My submission is that:

I appreciate that the Council has attempted to find a more appropriate recession plane solution for Christchurch based on its latitude and I do encourage you to retain this in the final plan decision.

What I don't understand is the provision which states:

In addition to the above, those buildings greater than

12 metres in height that are set back seven metres from

east-west boundaries, six metres from northern boundaries,

and eight metres from southern boundaries, are exempt

from recession planes (subject to zone controls).

Primarily because I can't find any calculations to show what impact a building that is say 14 metres tall with the required set backs would have on a neighbouring property's access to sunlight.

Provision: Chapter 6 General Rules and Procedures

Seek Amendment

I seek the following decision from the Council

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

To protect all residents who rely on these private stormwater systems and in the face of climate change, you must add a qualifying matter for any property where a private stormwater drainage system/easement exists.

This qualifying matter will serve as a 'pause' to ensure a site visit and adequate calculations of the stormwater catchment are made and reviewed by all affected parties before development can be approved.

You cannot take away our rights to have a say in what happens to affect our drainage in these areas, as the Council takes no responsibility to maintain them.

Alternatively, if you refuse to make this a qualifying matter, then the Council should take ownership of these drainage systems so if problems eventuate from development, it is the Council's responsibility to fix them.

My submission is that:

The only provisions for **qualifying matters relating to infrastructure** are related to a public transport accessibility restriction and one for vacuum sewer wastewater constraint areas.

A qualifying matter that has been missed is the existence of private stormwater drainage systems.

The Council does not take any responsibility for the maintenance of these systems, nor if a drainage problem eventuates. I have a letter dating back to July 1999 from Mayor Garry Moore which states "*The consents team leader in the Water Services Unit confirms that it is normal practice to 'flag' the existence of private drains on private properties on LIM requests if the City Council has the information on its records. In many cases private drains are not shown on City Council plan records*"

The private drain on Tulloch Place in Papanui and the surrounding area "*was checked and found that a private drain is indicated in pencil but so lightly as to be almost illegible.*"

The Community Law Centre confirmed for me that is well-known that in the older parts of our city – the very areas slated for high intensity housing – have the poorest records. A desktop Building Act/consent exercise is likely to miss the existence of private stormwater easements and, importantly, if the Council takes no responsibility for these drains, it cannot allow change to the drains without the remaining owners' consent to do so.

I contacted the Council several times as I was in the process of compiling information for this submission; one officer could not find the drainage system I was talking about in the records, whilst others could, which points to the fraught nature of the exercise.

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 30/04/2023

First name: Carl

Last name: van Essen

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 1 Introduction

Oppose

I seek the following decision from the Council

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

Change to plan change 14 should be abolished because it is unnecessary under current population growth levels.

My submission is that:

The council claims that we are going to have to have another 40,000 homes and the answer is to instead of finding areas suitable for high rise apartments or new subdivisions, where the necessary infrastructure is put in place to cope with the demands of the extra strain on the sewer system; and roads their answer is a town planning free for all where people can put multiple story buildings with little thought to how it affects the already established buildings around them.

The council believes that 'thriving' is living in an overpriced shoe box in a concrete jungle, while your infrastructure such as your sewer system and roads can't cope with all the extra load, hardly the image you think of when Christchurch was at one time called the 'garden city'

Their idea that people will live close to public transport and opt to not have a car sounds ok in theory but in practice peoples job situation changes, commutes changes, 2 different members of a household might suddenly need to travel to completely different destinations, the bus service is not reliable enough.

A result of their misguided approach to not mandate sufficient car parking space is going to be cars parked out on the street and grid lock at rush hour from all the extra commuters.

These new concrete jungles will be more susceptible to flooding and the cars parked out on the street will be easy picking for criminals.

The only people who look to benefit from this housing intensification are developers and the council bringing in more revenue from rates.

It is a shameless short term money grab; rather than the councils spin about creating affordable housing for everyone.

The new developments springing up are not designed to be sympathetic to the neighbourhood and are not affordable, they are designed to maximise returns for the developers and maximise rates revenue for the council.

The council need to find suitable areas for creating high density housing such as the city centre, where sufficient car parking is mandated.

They need to invest in infrastructure and advocate for good design rather than their present sardine can housing approach where they are piggy backing off old systems that won't be able to cope with the extra load.

A good example of better high density housing design is advocating good green space amongst buildings as this promotes the well being of the residents living there.

Areas like Hornby designed from the get go with sections to cater for single family homes, should remain as it is.

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 30/04/2023

First name: Ali

Last name: McGregor

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Oppose

I seek the following decision from the Council

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

The Council needs to rethink this plan taking into consideration the quality of life of its ratepayers.

My submission is that:

The plan includes almost all of the Christchurch residential area. The inner suburbs are all included.

Building multiple dwellings on a section where there was just one home puts huge pressure on the surroundings.

Parking becomes impossible. I live in Bishop Street and the increase in the number of dwellings even now means that there is no parking for visitors in the street. The new townhouses may have one garage only and no off street parking. This has resulted in a most attractive tree-lined street now being choked with cars so that the street has essentially become one way. The solution to this is definitely NOT to remove the trees and get rid of the grassed berm.

Since the earthquakes, every time a house is demolished up to 5 units are built on the section.

This also has the effect of removing all the trees from sections. Where once there was about 50% of a section which was 'green' it is now all concrete. My personal experience is that two of my boundaries which were tree lined are now bare of those mature trees and I have neighbours so close that I can hear their conversations.

This has a detrimental effect on the physical environment. The loss of greenery also has a negative impact on the mental and emotional health of the residents.

Apart from that, the increase in sealed areas means more run-off and makes the area more prone to flooding. Climate change has seen heavier rainfall and therefore more frequent flooding events already, so if this trend is to continue it will only lead to more problems.

From experience, the infrastructure is already unable to cope. Are there plans to improve this?

Is consideration being given to quality of life for families? The sections with multi-units are not suitable for children to play outside. In a society where there is already concern for the well-being of young people, reducing the opportunity for them to be outside and gaining the benefits of exercise, fresh air and socialisation is foolhardy and

is the opposite of what we are trying to promote. Isolation in small units is the result.

Many of the residences being built are not quality builds - and my concern is that this plan will destroy our 'Garden City' and replace it with overcrowded ghettos where families have no privacy or peace. The plan will suit those who wish to make money but not take responsibility for the consequences of their actions.

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 30/04/2023

First name: Lisa

Last name: Fabri

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Support

I seek the following decision from the Council

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

The farm and lifestyle blocks on John Paterson Drive should be considered prime land for residential Medium or high Density approval /development as they can no longer be used as farm land and the subdivisions surrounding us make it impossible to maintain livestock due to traffic and residential pets etc...

My submission is that:

We would like to submit that our area (address 15 John Paterson Drive) is earmarked for Residential development. All the surrounding farmland has been approved for residential and has been developed into subdivisions (Longhurst/Knight stream). We are surrounded by residential and have good access to city via bike tracks, buses and motorway access. We therefore support the report but would like to suggest the proposed areas include ours as it is clear it would complement your current plans.

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 30/04/2023

First name: Rachel

Last name: Davies

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Oppose

I seek the following decision from the Council

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

Please see above for more details from my submission as to what I believe should be done. Ultimately, I want the Council to reduce the zones for High and Medium Density to closer to the city centre - so that it is not encroaching on existing neighbourhoods in Spreydon and Hoon Hay. Three storey housing should only be found in and close to the city centre, not in existing older suburban areas. Rigid controls should be in place for access to sunlight and privacy along with how much land coverage dwellings can take up on a plot of land.

My submission is that:

It concerns me that the government seems to treat all cities the same with regards to housing development and density rules. I understand that a submission can not change the government's National Policy Statement on Urban Development and the implementation of Medium Density Residential Standards. I however, want my voice to be heard with other like minded people to plead with our Council to ensure protective measures can be put in place to limit the negative impacts that these new standards pose. I applaud the council in their attempt to try and temper this dramatic change and extend the enforcement timeframe by adding Qualifying Matters such as the 'Sunlight Access'. I however feel this is not enough. The people of Christchurch need to be listened to, especially those who will be directly affected by future development.

Hoon Hay, Christchurch is my home, the place where we chose to buy and bring up our family in a home that was in a safe neighbourhood with a backyard, where our children can play, we can grow a garden and have space, peace and privacy. I feel this is typical of many residents who chose to live in the suburban areas that fringe the city center. I am now constantly shocked each time I travel down a local street to see so many properties demolished and replaced with two storey townhouses; many that are terraced, offering no space or privacy. They go nowhere to enhance the character of the neighbourhoods they now dominate. The original homes now seem squashed and overshadowed by these towering monstrosities. Gone is their light, privacy and peace; replaced by multiple dwellers, their cars, noise and pressure on existing infrastructure. It frightens me to say the least that this seems to be the future of Christchurch.

I speak from a more protected position, as when I found our property on the Christchurch District Plan Map, we are in the Residential Suburban Zone and have another protective layer of being identified as having low public transport accessibility - again thanks needs to go to the Council for acknowledging this and using it to our advantage to prevent more sprawl of the MDRS. I am however aware that this level of protection is vulnerable as there is never any guarantee that zones don't change. The only thing that makes me different from a poor family who finds themselves in the Residential Medium Density or Transition Zones are a couple of streets! It is frightening to think that their little slice of paradise could be dramatically threatened if a developer buys a property next to them and fills it to capacity with two or three storey units!

I therefore totally oppose the proposed changes for the following reasons:

- Increased building heights in suburban areas will dramatically reduce sunlight for existing properties.
- Multiple storey dwellings negatively impact on the privacy of existing single storey residences.
- Developing properties which once housed four to five people to house 12 plus people puts pressure on existing services - predominantly water, stormwater and sewerage.
- More people living on a property with no access to a garage or off street parking means more vehicles are parked on the street, thus impacting on existing parking spaces for original residents.
- Existing gardens, trees and green space are destroyed and replaced with concrete or other impervious surfaces - this alters our

so called 'Garden City' identity. What quality of life do these new residents have with an outdoor area, the size of a small patio? Is that the type of home we want the future children of Christchurch to be brought up in? How will they have a love of nature, fun and play outside - if their own outdoor space is a piece of exposed aggregate or a wooden deck the size of a carpark, if that? Sure the developers may argue that children can be taken to a local park to play - but really? Children should be able to play outside whenever they want, at their own home! Also, what happens to the rain that falls? It can no longer be absorbed by a lawn or garden - instead it becomes runoff increasing the risk of flooding.

- We are not Auckland or Wellington! We have space to expand in a range of areas. Many of the new subdivisions that keep popping up seem to have zones enabling high density multi storey housing - we often don't see this in reality though - instead we see single story dwellings on teeny tiny plots of land.
- The only ones who seem to be benefiting from this change are the developers who are lining their pockets with the profits from destroying existing neighbourhoods. They don't care what happens next once they've destroyed homes and built multiple dwellings at high speed with cost cutting measures. They just want the payout at the end and the move on to find the next plot of land. They squeeze people out and create a domino effect. Those strong enough or brave enough to say no to their buying power, get punished later when their land is worth nothing as it's been surrounded.

I can't complain without offering some solutions or possible options that I feel would be a better alternative to the proposed changes. If new development is to continue with no need for resource consent the following should be considered:

- Continue to add and push for Quality Matters to ensure new development meets more stringent controls over sunlight, safety, privacy, environmental factors and aesthetics.
- Get more legal advice as to residents not being able to appeal decisions which go to hearings - this does not seem right that appeals are not allowed. We need to try to beat the Government at their own game by finding more loopholes or laws to protect the residents of Christchurch from these changes.
- Prioritize or incentivise high density residential development starting from the city center then working outward, once land there has first been developed.
- Develop more multistorey or terraced styled housing in new subdivisions where infrastructure can be put in place to best service these new dwellings.
- Rezone and develop underutilized areas of land closer to the city into new trendy housing development - the development near the railway in the Addington Court Theatre district is a good example of this type of land.
- Potentially redevelop existing large buildings into apartments e.g. Princess Margaret hospital (potentially moving the services offered there now to new premises to free up space not being used).
- Develop existing crown owned land into higher density housing e.g. the old Spreydon School site.

Thank you for considering my submission and recommendations. This seems like a minefield of issues, laws, rules, policies and regulations. Please try to keep at the forefront that Christchurch is the 'Garden City'. We are lucky - we have space, we think in smart ways and there are solutions to these issues which don't require us ruining the wonderful neighbourhoods we have that make Christchurch so special.

Attached Documents

Name
Submission for Proposed Plan Change 14 - Housing

It concerns me that the government seems to treat all cities the same with regards to housing development and density rules. I understand that a submission can not change the government's National Policy Statement on Urban Development and the implementation of Medium Density Residential Standards. I however, want my voice to be heard with other like minded people to plead with our Council to ensure protective measures can be put in place to limit the negative impacts that these new standards pose. I applaud the council in their attempt to try and temper this dramatic change and extend the enforcement timeframe by adding Qualifying Matters such as the 'Sunlight Access'. I however feel this is not enough. The people of Christchurch need to be listened to, especially those who will be directly affected by future development.

Hoon Hay, Christchurch is my home, the place where we chose to buy and bring up our family in a home that was in a safe neighbourhood with a backyard, where our children can play, we can grow a garden and have space, peace and privacy. I feel this is typical of many residents who chose to live in the suburban areas that fringe the city center. I am now constantly shocked each time I travel down a local street to see so many properties demolished and replaced with two storey townhouses; many that are terraced, offering no space or privacy. They go nowhere to enhance the character of the neighbourhoods they now dominate. The original homes now seem squashed and overshadowed by these towering monstrosities. Gone is their light, privacy and peace; replaced by multiple dwellers, their cars, noise and pressure on existing infrastructure. It frightens me to say the least that this seems to be the future of Christchurch.

I speak from a more protected position, as when I found our property on the Christchurch District Plan Map, we are in the Residential Suburban Zone and have another protective layer of being identified as having low public transport accessibility - again thanks needs to go to the Council for acknowledging this and using it to our advantage to prevent more sprawl of the MDRS. I am however aware that this level of protection is vulnerable as there is never any guarantee that zones don't change. The only thing that makes me different from a poor family who finds themselves in the Residential Medium Density or Transition Zones are a couple of streets! It is frightening to think that their little slice of paradise could be dramatically threatened if a developer buys a property next to them and fills it to capacity with two or three storey units!

I therefore totally oppose the proposed changes for the following reasons:

- Increased building heights in suburban areas will dramatically reduce sunlight for existing properties.
- Multiple storey dwellings negatively impact on the privacy of existing single storey residences.
- Developing properties which once housed four to five people to house 12 plus people puts pressure on existing services - predominantly water, stormwater and sewerage.
- More people living on a property with no access to a garage or off street parking means more vehicles are parked on the street, thus impacting on existing parking spaces for original residents.

- Existing gardens, trees and green space are destroyed and replaced with concrete or other impervious surfaces - this alters our so called 'Garden City' identity. What quality of life do these new residents have with an outdoor area, the size of a small patio? Is that the type of home we want the future children of Christchurch to be brought up in? How will they have a love of nature, fun and play outside - if their own outdoor space is a piece of exposed aggregate or a wooden deck the size of a carpark, if that? Sure the developers may argue that children can be taken to a local park to play - but really? Children should be able to play outside whenever they want, at their own home! Also, what happens to the rain that falls? It can no longer be absorbed by a lawn or garden - instead it becomes runoff increasing the risk of flooding.
- We are not Auckland or Wellington! We have space to expand in a range of areas. Many of the new subdivisions that keep popping up seem to have zones enabling high density multi storey housing - we often don't see this in reality though - instead we see single story dwellings on teeny tiny plots of land.
- The only ones who seem to be benefiting from this change are the developers who are lining their pockets with the profits from destroying existing neighbourhoods. They don't care what happens next once they've destroyed homes and built multiple dwellings at high speed with cost cutting measures. They just want the payout at the end and the move on to find the next plot of land. They squeeze people out and create a domino effect. Those strong enough or brave enough to say no to their buying power, get punished later when their land is worth nothing as it's been surrounded.

I can't complain without offering some solutions or possible options that I feel would be a better alternative to the proposed changes. If new development is to continue with no need for resource consent the following should be considered:

- Continue to add and push for Quality Matters to ensure new development meets more stringent controls over sunlight, safety, privacy, environmental factors and aesthetics.
- Get more legal advice as to residents not being able to appeal decisions which go to hearings - this does not seem right that appeals are not allowed. We need to try to beat the Government at their own game by finding more loopholes or laws to protect the residents of Christchurch from these changes.
- Prioritize or incentivise high density residential development starting from the city center then working outward, once land there has first been developed.
- Develop more multistorey or terraced styled housing in new subdivisions where infrastructure can be put in place to best service these new dwellings.
- Rezone and develop underutilized areas of land closer to the city into new trendy housing development - the development near the railway in the Addington Court Theatre district is a good example of this type of land.
- Potentially redevelop existing large buildings into apartments e.g. Princess Margaret hospital (potentially moving the services offered there now to new premises to free up space not being used).

- Develop existing crown owned land into higher density housing e.g. the old Spreydon School site.

Thank you for considering my submission and recommendations. This seems like a minefield of issues, laws, rules, policies and regulations. Please try to keep at the forefront that Christchurch is the 'Garden City'. We are lucky - we have space, we think in smart ways and there are solutions to these issues which don't require us ruining the wonderful neighbourhoods we have that make Christchurch so special.

Please see above for more details from my submission as to what I believe should be done. Ultimately, I want the Council to reduce the zones for High and Medium Density to closer to the city centre - so that it is not encroaching on existing neighbourhoods in Spreydon and Hoon Hay. Three storey housing should only be found in and close to the city centre, not in existing older suburban areas. Rigid controls should be in place for access to sunlight and privacy along with how much land coverage dwellings can take up on a plot of land.

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 30/04/2023

First name: Darren

Last name: Fabri

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Support

I seek the following decision from the Council

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

John Paterson Drive is now an island surrounded by motorway and residential development. it is no longer rural living.

My submission is that:

Due to all the encroaching subdivisions and motorway our land is no longer fit for what we initially bought it for a rural block to graze and breed horses on. John Paterson Drive is a dramatically different set up from when we purchased it as a rural block. The land right up to John Paterson Drive has been developed into residential blocks and the Motorway has been built right up to us as well. So our land is now much more suited to residential than rural lifestyle. We have great public transport options and are also close to the motorway and cycle trails so we have great access into the city and also to Prebbleton, Hornby, Rolleston etc.

Richmond Road has already connected John Paterson Drive to the Knight Stream and Longhurst subdivisions .

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 30/04/2023

First name: John

Last name: Campbell

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 8 Subdivision, Development and Earthworks

Support

I seek the following decision from the Council

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

The are Be designated MZR with no influence / changes from the ;

Riccarton Bush restrictions proposed and the

Airport Noise Influence proposed

My submission is that:

I support the MRZ riccarton Zone to South of Rata St and Kauri St as proposed without the changes by the Riccarton Bush and Airport Restrictions.

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 30/04/2023

First name: Paul

Last name: Wing

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 13 Central City

Seek Amendment

I seek the following decision from the Council

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

My submission is that:

The height of all buildings in the central city should be limited to no more than 5 stores.

Provision: Chapter 14 Residential

Seek Amendment

I seek the following decision from the Council

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

My submission is that:

Recession planes need to be protected for all residential development. Sunlight is a free source of heating. Recession planes should protect existing residential properties from negative impact of new multi-storey builds.

Housing intensification should be better planned. Current plan will lead to bad design. Intensification should be done at the block level not at the section level.

As a minimum all new builds should be built to passive house standards, we need more better design and planned house, not the unplanned low standard intensification of this Plan Change

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 30/04/2023

First name: Laurie

Last name: Shearer

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Oppose

I seek the following decision from the Council

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

My submission is that:

The proposed area catchment of six stories high across the city is way **too far reaching**. We live in Merivale and this would radically alter the feel and aesthetics of this community detrimentally. We purchased our property in June 2022. This is a 1926 year old bungalow. The street has many other old bungalows as do other streets that are situated in close proximity to the Merivale shopping precinct. Allowance for developers to build six story high buildings on our street or in the area would completely destroy the aesthetic of this community which is currently a positive for the city. As well as the aesthetic, the actual physical reality would be a significant reduction in light and sun in many properties. Psychologically, this would definitely have a negative impact on peoples mental wellbeing.

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 30/04/2023

First name: Rosemary

Last name: Neave

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Seek Amendment

I seek the following decision from the Council

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


Update regulations to support Council's commitment to mode shift in regard to carbon budgets, and actively encouraging people to cycle by ensuring developments cater in meaningful and useful way

My submission is that:

CCC must update regulations in regard to developers providing usable, sensible and accessible bicycle parking in every intensive development:

- Specifying cycle parking facilities that lack adequate security and weather proofing.
- Hanging bike racks are insufficient as they cannot be used by e-bikes or cargo bikes, or anyone who has difficulty lifting a bike.
- Cycle parking provided must be in a location which does not require the cyclist to carry the bike up stairs and/ or through a residential unit.

Attached Documents

Name
My efforts to save this online failed twice 

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 30/04/2023

First name: Rosemary

Last name: Neave

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 6 General Rules and Procedures

Support

I seek the following decision from the Council

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

I support the Tree Canopy Cover rules and Financial Contributions to restore our tree canopy. Trees are important in reducing emissions, providing shade and temperature control in the summer, alongside the other wide range of economic, health and social effects. I seek that the council retains the tree canopy requirement and contributions plan.

My submission is that:

The council will require 20% of new residential developments to be covered by trees, or otherwise pay a financial contribution to help the council plant more trees on public land. Christchurch has an appallingly low tree canopy cover rate of 13% compared to Auckland (18%) and Wellington (30%). Trees have a wide range of environmental, health, social and economic benefits and are important for the future of our city.

Provision: Chapter 14 Residential

Oppose

I seek the following decision from the Council

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

I oppose the Low Public Transport Accessibility Area Qualifying Matter as I believe that the public transport layout and network will need changes to prepare and accommodate future growth. We should not define future growth in Christchurch based on these routes. This would also artificially limit future housing in our city. I seek that the council drop this qualifying matter.

My submission is that:

The council plans to restrict housing in some areas of the city because they are poorly serviced by the lack of current high frequency public transport routes. Some areas solely designated with this qualifying matter such as in Casebrook and Styx are close to rail corridors, existing commercial areas and are serviced by low frequency routes. In the future, these areas could see a boost in service by more buses on current routes or introduction of a commuter rail service.

Provision: Chapter 14 Residential

Oppose

I seek the following decision from the Council

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

I oppose the Sunlight Access Qualifying Matter. There are many cities in the Northern Hemisphere that are further away from the equator and have a higher level of housing intensification than Christchurch. With a mix of medium and high density housing, these cities are considered some of the most livable cities in the world. This qualifying matter would restrict medium density housing height and size in such a way that would create a less efficient usage of land and limit future housing. I seek that the council drop this qualifying matter.

My submission is that:

There are many cities in the world that have high density and are further from the equator than Christchurch. Cities such as Vienna, Copenhagen, Toronto, Geneva, and Calgary are consistently ranked some of the most livable cities in the world. This qualifying matter would reduce the maximum height and size of medium residential buildings below what is legally required. This qualifying matter has been developed with the expressed purpose of protecting and increasing property values rather than increasing the amount of affordable housing for people.

Provision: Chapter 14 Residential

Support

I seek the following decision from the Council

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

I support high-density housing near the city and commercial centres. We need to allow more people to live near services and amenities to reduce car dependency. This would allow more people to take active and public transport to commute, shop and play. I seek that the council enable 6 to 10 storeys for residential buildings near commercial centres.

My submission is that:

The council is required by law to allow residential buildings of at least 6 storeys within a 1.2km radius of commercial centres such as malls and the city centre. The council plan to enable this, while also allowing up to 10 storeys for residential buildings closer to the city centre. This would enable a wider range of dense housing development options. It would also allow more people to live close to services and amenities.

My efforts to save this online failed twice

CCC must update regulations in regard to developers providing usable, sensible and accessible bicycle parking in every intensive development:

- Specifying cycle parking facilities that lack adequate security and weather proofing.
- Hanging bike racks are insufficient as they cannot be used by e-bikes or cargo bikes, or anyone who has difficulty lifting a bike.
- Cycle parking provided must be in a location which does not require the cyclist to carry the bike up stairs and/ or through a residential unit.

Update regulations to support Council's commitment to mode shift in regard to carbon budgets, and actively encouraging people to cycle by ensuring developments cater in meaningful and useful way.

Rosemary Neave
45 Moncks Spur Road Redcliffs
rosemary@womentravel.co.nz
0272890383

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details


Submission Date: 30/04/2023

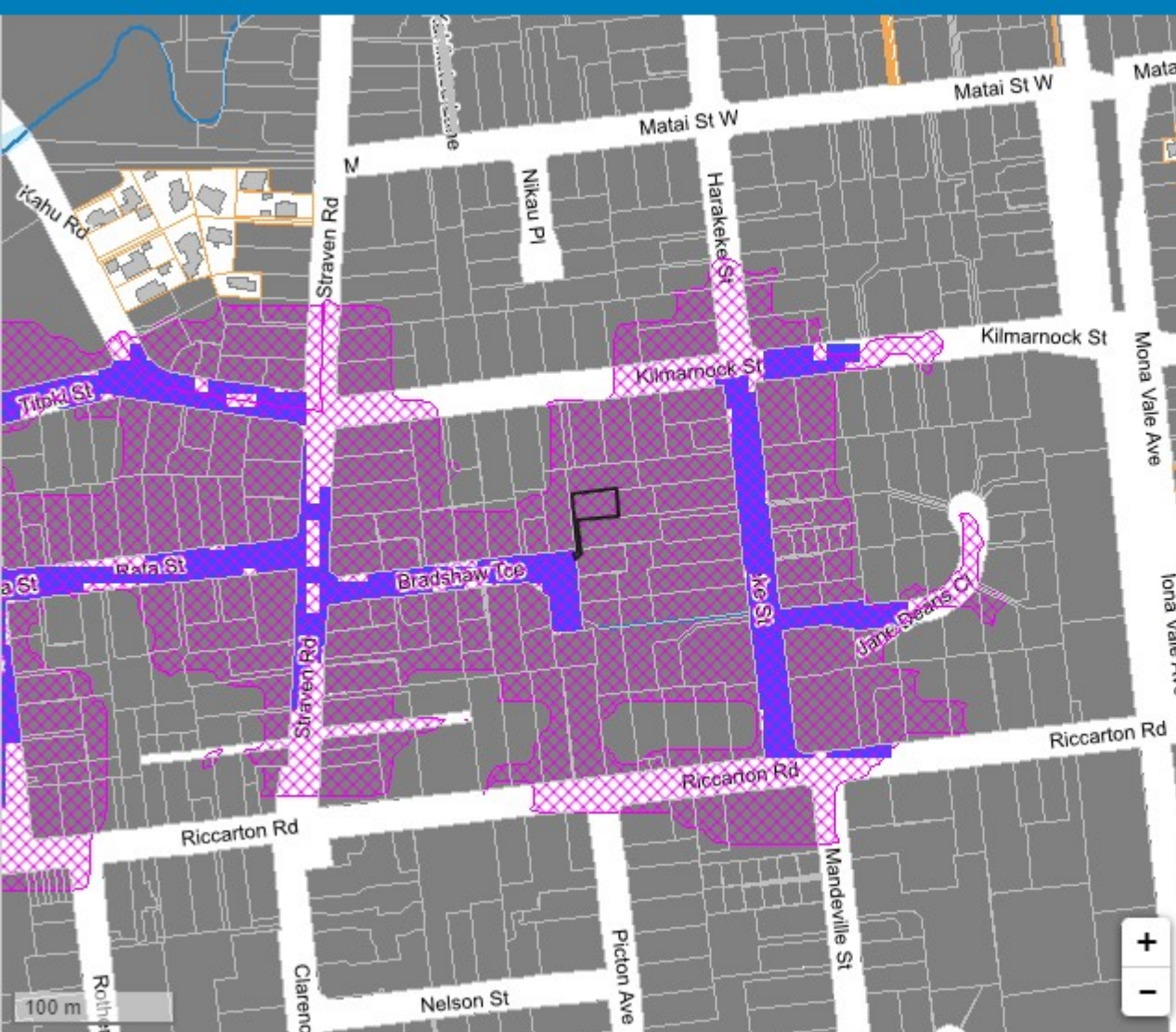
First name: Helen

Last name: Spear

Preferred method of contact Email

Attached Documents

Name	
flood map	



Flood Information

Map	<input checked="" type="checkbox"/>
Flood extent (200 year)	<input checked="" type="checkbox"/>
Flood Level Control Area (50 year)	<input checked="" type="checkbox"/>
Flood extent (50 year)	<input checked="" type="checkbox"/>
Assessment Incomplete	<input type="checkbox"/>
Flood Level Assessments	<input type="checkbox"/>

District Plan

Map	<input type="checkbox"/>
Specific Purpose Flat Land Recovery Zone	<input type="checkbox"/>
Flood Management Area	<input checked="" type="checkbox"/>
Waterway	<input checked="" type="checkbox"/>

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 30/04/2023

First name: Tony

Last name: Rider

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Oppose

I seek the following decision from the Council


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

Removal of Bush Inn's Town Centre status

My submission is that:

Please see the attached file

Attached Documents

Name
CCRA-submission-PC14 

Plan Change 14 Submission

- Church Corner Residents Association



Overview

It is paramount for everybody living in New Zealand to have a warm, dry, and safe home. It requires more than a roof over one's head. It is essential to have access to green space and recreational areas in a well-planned, future proof community. It is essential that it caters for new neighbours and existing ones. It is essential that housing initiatives need to awahi te tiriti o Waitangi by respecting the land and our carbon footprint on it.

Objection To Intensification

Intensification is another form of colonisation; herding people into confined spaces with no private areas (ie... courtyards) for whanau and friends. There is no space to grow small patches of vegetables, supplementing the forever increasing inflation and cost of living.

Additionally, Church Corner/Bush Inn is proposed to go from Residential Suburban Zone and Residential Suburban Density Transition Zone (RSDTZ) to High Density Residential Zone. The council's own definition for RSDTZ says it "covers some inner suburban residential areas between the Residential Suburban Zone and the Residential Medium Density Zone". This means Church Corner/Bush Inn is completely skipping Residential Medium Density Zoning (RMDZ) despite not having enough growth and need to be rezoned to RMDZ in the first place. This is unacceptable.

Church Corner & Bush Inn: The Bypass To Other Places

Church Corner and Bush Inn is not a 'Town Centre Zone'.

If you were to take a poll with those intimately familiar with Church Corner and Bush Inn, you would find it is only a destination for the *local* community. For others who are not local, it is a transit way to and from Riccarton, Hornby, or other South and West destinations. Even Christchurch City Council's Southern Express Major Cycle Route excludes Bush Inn as a destination (Council, 2019). It only lists The Hub Hornby, Westfield Riccarton Mall and Tower Junction as shopping destinations.

PC14 talks about planning for Business Centres – The Bush Inn Centre is failing, with high rents, limited parking, and businesses finding success by moving elsewhere. People are more interested in open, modern malls like the successful Tower Junction and Northlink Shopping Centres. They cater for a wider range of shopping needs. The Bush Inn mall is very small and half empty, and has been rated mediocre by patrons (Fig 1).

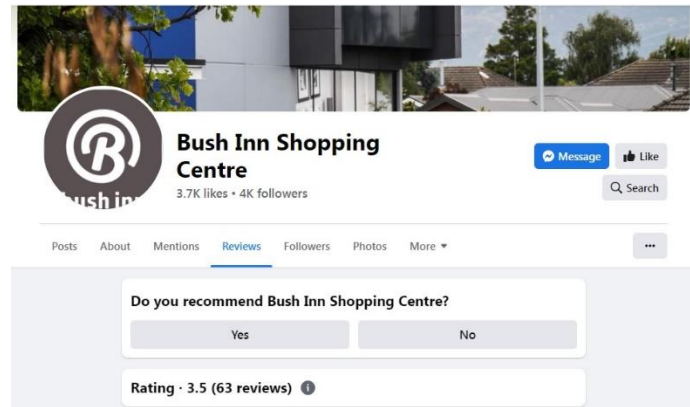


Figure 1- Poor ratings and minimum followers

Lets compare Northlink to Bush Inn as an example. Using 2018 Census Data, Bush Inn and immediate surrounding areas (Fig 2) [Riccarton West, Wharenui, Upper Riccarton, Sockburn North, Ilam South, Ilam University, Deans Bush] has 23,031 people with 6981 occupied private dwellings in a 7.45KM² area. This makes a density of 3091 people per KM².



Figure 2- Bush Inn Area

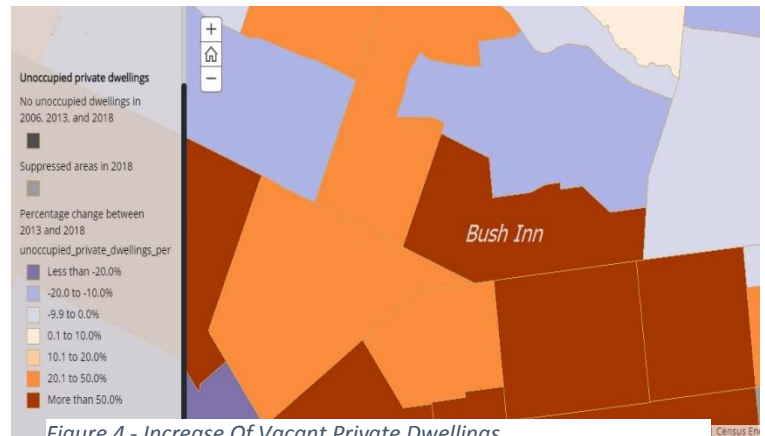
Northlink is in Northlands (Fig 3), and when including immediately surrounding areas (Papanui East, Papanui West, Papanui North, Northcote) there are 10005 people in 3879 occupied private dwellings in a 4.86KM² area. This is only 2058 people per KM²; more than a thousand less per KM² when compared to Bush Inn and surrounding areas.



Figure 3- Northlands Area

This shows the Bush Inn / Church Corner area is more *densely* populated, larger in size, larger in population, and larger in housing – yet the so called “Town Centre Zone” is failing year by year. There has even been a reported 1338 increase in population between 2013 and 2018 for Bush Inn and surrounding areas, with the number of private dwellings becoming unoccupied also increasing (Fig 4). This is a notable increase of persons living in the same home – population increase and persons living in closer proximity, with the mall continuing to increase in vacant retail lots.

Bush Inn Centre is *not* a Town Centre Zone.



Public Transport

Part of the decision making process was the availability of public transport. The public transport hub in Riccarton has been fraught with violence and poor behaviour. There now is static guards and police still need to attend incidences there. A quick online search shows headlines about ongoing problems dating back as far as 2016.

By designating Bush Inn as a Town Centre Zone, and allowing heavy intensification in the area, the problems seen at the Riccarton transport hub will migrate and extend to Bush Inn.

Sunlight, Health, And Wellbeing

In regards to height of buildings, it has been reported that some people and properties may have a reduction of sunlight by three months per year. It is not acceptable to block sunlight for an additional three months per year for those unfortunate to end up near a newly constructed, tall, populated building. Doing so is counter-productive to the “warm dry home” objective.

Having no sunlight causes dampness, mould, and degradation to structures made of wood or brick. (Klein-Nixon, 2019) Gardens will be hard to tend and cultivate. This impacts persons in all socio-economic situations, but will be particularly hard on lower income persons who need a garden to stave off rising grocery bills. It can also be expected the various “Community Pantries” to share and trade home grown produce will disappear.

This reduction by three months of sunlight will also affect homes with and/or intending to install solar power; heavily contrary to the green image and proactive approach to the environment that is Christchurch mantra. Solar power systems, intended to reduce our carbon footprint, will not work to their full potential when overshadowed.

Medically speaking, it is accepted that lack of sunlight depletes vitamin D intake and has a direct effect on mood. (Holick, 2008) It leads to mental health issues, which the medical system is already heavily underfunded and struggling to cope with. A 2022 study published in Psychiatry International [Influence of External Natural Environment Including Sunshine Exposure on Public Mental Health: A Systematic Review] concluded "The results showed that exposure to sunlight, exposure to and use of green spaces, and physical activity each positively affected mental health. The use of green space was also associated with exposure to sunlight and promotion of physical activity, suggesting that internal factors as represented by moderate physical activity under specific external conditions or in an environment that mimics the external environment may contribute to further improvement of mental health."

Lack of sunlight will especially affect the mental health of homebound, elderly, and disabled residents. The idea of "going for a walk in the sun" is not viable for many. This is Christchurch; our climate is different from Auckland in the winter it and overshadowed footpaths will be icy and traffic demands will increase.

Character And Function

An infill of tall high density buildings is not in keeping with the character of Bush Inn/Church Corner; overshadowing St. Peters Church (Heritage New Zealand Category 2), and impacting the quiet tree lined cul-de-sac of Ballantyne Ave (Fig 5).



Figure 5- Ballantyne Ave

Infrastructure in Bush Inn/Church Corner will not support intensification, with flooding in areas, including Ballantyne Ave, a regular winter occurrence. The area currently has older homes with aged, small drains. They were laid with drainage for low density properties whereas newer houses have a sump like buffering system fit for higher density housing. The current low-density systems do not cope with heavy rains.

Recent council reports state, for example, that “It is not possible to fix flooding and some level of flood risk would be present even if investment were significantly increased” (Law, Stuff, 2023). Council reports a need for \$1.7m of network upgrades that have not been put on budget. It is foolish to intensify in Church Corner/Bush Inn area, when currently 27% of Christchurch’s water use being wasted in leaking infrastructure (an increase from 18% in 2018) (Law, Stuff, 2023), while also battling flooding.

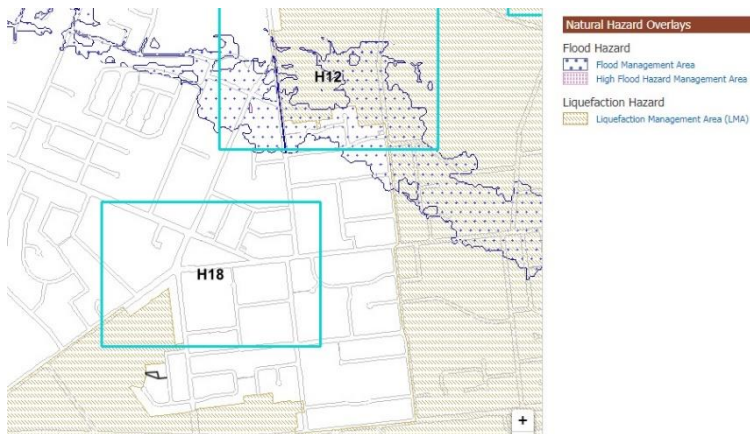


Figure 6 - Hazard Management Surrounding Bush Inn

Poor infrastructure with global warming causing extreme weather events is not a viable mix with intensifying housing. Especially when the area is surrounded on three sides by Liquefaction and Flood Management Areas (Fig 6).

Drainage and water systems are not the only infrastructure topics that intensification will adversely impact. Traffic safety issues and congestion are already a concern, with a Major Arterial Road, Minor Arterial Road, and Collector Road all in close proximity (Fig 7).



Figure 7- Busy Main Roads In A Small Area

For example, Curletts Rd forms part of State Highway 73 and is a busy four-lane road near Our Lady of Victories Catholic Primary School, Middleton Grange School, Riccarton High

School, and Te Kāpehu Riccarton. Curletts road is often overflowing (Fig 8), as is the intersections of Main South Road, Yaldhurst, and Hansons lane. Intensification will increase children using the cycleways and footpaths to get to school and increase their risk of injury and accident due to motor vehicle traffic. They already are risk, and are being hurt, with the current roading infrastructure in the area.

STUFF 15/03/2023

A boy was reportedly riding a scooter when he was critically injured after being run over by a car in Christchurch.

A boy who was left critically injured after being run over by a car in suburban Christchurch is understood to have been riding a scooter at the time.

The child was knocked down during the school pick-up rush hour in Upper Riccarton on Tuesday, leaving him trapped underneath a car.

Bystanders [helped lift the vehicle off the badly injured boy](#), who was taken to hospital in a critical condition.

Congestion in this area gives further complexity to problems that will be introduced with intensification in our area. Have risks from the Alpine 8 been considered? There are only three main roads from this area to leave Christchurch; Curletts Road, Yaldhurst Road and Main South Road. It is not sensible nor viable to further congest these roads where they merge – Church Corner/Bush Inn. It is a risk to all South-West Communities. It will also add further delays to emergency services.



Figure 8- Heavy congestion on Curletts Road

Another consideration, in regards to congestion, is the impediment to street parking in the area, and the impact on current cycleways. As the new “cycle highways” were being built, connecting parts of Christchurch and running nearby Bush Inn/Church Corner, street parking disappeared (Fig 9). Intensification will make the lack of street parking a further burden, and double down on safety concerns for the cycleways council has installed.



Figure 9- Cycleways a common feature of Bush Inn/Church Corner

Privacy

In our mostly single storey suburb we value the privacy, peace and quiet of our sections. They are a haven for 'recharging our batteries'. We were not overlooked on from tall buildings and have freedom to conduct our lives with a comfortable level of privacy. Tall buildings of 3 to 5 storeys at close proximity would dominate our skylines and invade privacy.

Lessons From A Pandemic

As density of population increases and the concentrates in a smaller area, infection rates for diseases increase (Khatatbeh, 2021). This was quickly learned through the onset of Covid 19, and Auckland suffered heavily due to their high population and intensified housing.

With the need of lockdowns to keep Covid under control, people in high density housing had a more difficult time keeping apart. It could almost be termed “the cruise boat effect”; one sick person to start the process that filled the entire place with infected people.

Goodbye “Garden” City

When large sections are redeveloped, there is often loss of trees within the section. Many of the remaining trees end up with the lopping of branches on public footpaths adjacent, preserving husks of trees on the edge if at all. Beyond removing the “Garden” aspect of our city, this can deepen the effects heatwaves.

Problems Already At Our Door

With the expectation of being able to intensify, Kainga Ora is awaiting to build a large social housing complex at 17-19 Main South Road. The addition of a connecting road between Main South Road and Ballantyne Ave will greatly compound congestion, while the plan for the development itself is a bullet point list of all the problems discussed above.

This is a first hand example of poor planning, that intensification under PC14 allows (Grumball, 2022).

Solutions, Not More Problems

We all want to see Christchurch grow and flourish for our future generations. But we want it to grow with us rather than overshadow us with three to five story building structures. Intensification will change our community ambiance and our skyline, fragmenting our current community life.

People come to live in Church Corner/Bush Inn for the suburb 'backyard experience'. It is where a family can live. Children can play outdoors safely under parental control, and adults can work or relax knowing the charm and character of the area allows them so. People do not want multistorey townhouses here.

By developing section by section, as and where developers decide to, we are creating haphazard effects on the people nearby. Organised development, such as has occurred in Singapore, would mean consistency in provision of facilities and infrastructure and potentially be an attractive environment for all.

Take intensification to the actual city – our city centre where it belongs and not the 'perceived townships' being considered now. Canterbury can grow upwards and *then* outwards up from its actual "Town Centre Zone."

Alternatively, intensification in Rolleston and Halswell have been very successful. It has smaller land footprints, with green space and privacy. Why change a successful design and strategy.

We are proud to be the Garden City of New Zealand. Urban renewal is exciting and revitalising - renovation of homes and businesses while keeping in style with who we are as a community revitalises our city. We won't lose our heritage and can still watch kiwi's taking on a 'do-er-upper' – a quintessential way for kiwis to progress up the home ownership ladder. We want to support our community and welcome new neighbours; be it in social housing, retail blocks, or private owners & renters.

Design it right from the start and it will be successful. We want to fit our community together.

He aha te mea nui o te ao?
 He tangata, he tangata he tangata.
 What is the most important thing?
 It is people, it is people it is people.

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Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 30/04/2023

First name: Sheila

Last name: McLaughlin

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Oppose

I seek the following decision from the Council

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

West of Riccarton Mall should be kept residential

My submission is that:

I disagree with the changed plans outside the 4 avenues. Higher than 3 storey buildings will make Riccarton a separate city. I thought after the earthquakes 7 storey buildings were the limit. If the council agrees to 10 storeys have we got the fire engines to reach that height. You have already narrowed the roads so much emergency services must be slower. The govt. says it doesn't want urban sprawl, but talks about acres of solar panels.

Our street is already full of parked cars & electric scooters dropped in the middle of footpaths

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 30/04/2023

First name: Richard

Last name: McLaughlin

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 7 Transport

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:

'HRZ in Watford St and surrounding Strowan area (Watford St, Normans Rd, Halton St and Hawthorne St) to be changed to MRZ

My submission is that:

Transport and Infrastructure

I do not support the change of Watford St, Strowan (Halton St, Hawthorne, Watford St and Normans Rd) becoming a high residential area. As it is Watford St and surrounding streets are already highly congested with traffic and car parking issues due to the close proximity of St. Andrews College (1,700 students, 250 teachers) and the Waimairi Tennis Club (at peak over the summer period Monday-Sunday).

Any increase in housing density in the Strowan community (that is either MRZ or HRZ) will magnify this existing, on-street carparking problem and traffic congestion as new housing developments are no longer required to provide any on-site carparking. Of particular concern is that the PC14 proposes to enable HRZ along Papanui Road and one block either side of Papanui Road which is obviously at a higher level of intensification than even MRZ. As there is little on-street carparking in the area, and no on-site carparking required for new residential developments, carparking associated with ALL of this intensification will further exacerbate the carparking issues in the Strowan community.

This also presents a health and safety issue in an area which has many young families and school children present - due to increased traffic congestion, cars double parking and parking over driveways particularly during peak times which would be further exemplified by a HRZ.

There are already pockets of significant flooding in rainfall events in Strowan – with Branchley Avenue being one example where both the stormwater and wastewater networks do not cope in these events. HRZ intensification of the extent proposed in PC14 will exacerbate this across the neighbourhood. This is a known consequence of urban intensification in Christchurch (and elsewhere – recent Auckland flooding).

Amenity/Character andnbsp;Section 14.2.4.2 Policy – High quality, medium density residential development:

I suggest that the proposed HRZ which is shown to be almost continuous down Papanui Road and for at least one block either side of Papanui Road (including one side of Watford St) is not consistent with the stated intent of this Section/Policy above and it certainly does not support '...medium density residential development, which is attractive to residents, responsive to housing demands and reflects the planned urban built character of an area' The wide streets and traditional style homes make the area unique are special to the residents. Some homes being +100 years old - this history and uniqueness can't and shouldn't be replaced. andnbsp; There are a number of prominent trees and landscaping on properties which reinforces both the perception and reality of quality open space 'around' buildings (and which clearly supports the Council's Urban Forest Plan 2023 initiative).

CHANGE FROM HRZ TO MRZ IN STROWAN – SO AS TO BE CONSISTENT WITH STATED INTENTION

'Section 14.2.7 Objective – High Density Residential Zone: a High density residential development near larger commercial centres, commensurate with the expected demand for housing in these areas and the nature and scale of commercial activities, community facilities, and multimodal transport networks planned or provided in the commercial centres'. Strowan does not meet the above criteria (it is not located near a commercial centre). andnbsp;

Provision: Chapter 14 Residential**Seek Amendment****I seek the following decision from the Council*****If seeking to make changes to a specific site or sites, please provide the address or identify the area:***

'HRZ in Watford St and surrounding Strowan area (Watford St, Normans Rd, Halton St and Hawthorne St) to be changed to MRZ

My submission is that:**Transport and Infrastructure**

I do not support the change of Watford St, Strowan (Halton St, Hawthorne, Watford St and Normans Rd) becoming a high residential area. As it is Watford St and surrounding streets are already highly congested with traffic and car parking issues due to the close proximity of St. Andrews College (1,700 students, 250 teachers) and the Waimairi Tennis Club (at peak over the summer period Monday-Sunday).

Any increase in housing density in the Strowan community (that is either MRZ or HRZ) will magnify this existing, on-street carparking problem and traffic congestion as new housing developments are no longer required to provide any on-site carparking. Of particular concern is that the PC14 proposes to enable HRZ along Papanui Road and one block either side of Papanui Road which is obviously at a higher level of intensification than even MRZ. As there is little on-street carparking in the area, and no on-site carparking required for new residential developments, carparking associated with ALL of this intensification will further exacerbate the carparking issues in the Strowan community.

This also presents a health and safety issue in an area which has many young families and school children present - due to increased traffic congestion, cars double parking and parking over driveways particularly during peak times which would be further exemplified by a HRZ.

There are already pockets of significant flooding in rainfall events in Strowan – with Branchley Avenue being one example where both the stormwater and wastewater networks do not cope in these events. HRZ intensification of the extent proposed in PC14 will exacerbate this across the neighbourhood. This is a known consequence of urban intensification in Christchurch (and elsewhere – recent Auckland flooding).

Amenity/Character and Section 14.2.4.2 Policy – High quality, medium density residential development:

I suggest that the proposed HRZ which is shown to be almost continuous down Papanui Road and for at least one block either side of Papanui Road (including one side of Watford St) is not consistent with the stated intent of this Section/Policy above and it certainly does not support '...medium density residential development, which is attractive to residents, responsive to housing demands and reflects the planned urban built character of an area' The wide streets and traditional style homes make the area unique and special to the residents. Some homes being +100 years old - this history and uniqueness can't and shouldn't be replaced. There are a number of prominent trees and landscaping on properties which reinforces both the perception and reality of quality open space 'around' buildings (and which clearly supports the Council's Urban Forest Plan 2023 initiative).

CHANGE FROM HRZ TO MRZ IN STROWAN – SO AS TO BE CONSISTENT WITH STATED INTENTION

'Section 14.2.7 Objective – High Density Residential Zone: a High density residential development near larger commercial centres, commensurate with the expected demand for housing in these areas and the nature and scale of commercial activities, community facilities, and multimodal transport networks planned or provided in the commercial centres'. Strowan does not meet the above criteria (it is not located near a commercial centre).

Provision: Chapter 9 Natural and Cultural Heritage**Seek Amendment****I seek the following decision from the Council*****If seeking to make changes to a specific site or sites, please provide the address or identify the area:***

'HRZ in Watford St and surrounding Strowan area (Watford St, Normans Rd, Halton St and Hawthorne St) to be changed to MRZ

My submission is that:**Attached Documents**

Name



Transport and Infrastructure

I do not support the change of Watford St, Strowan (Halton St, Hawthorne, Watford St and Normans Rd) becoming a high residential area. As it is Watford St and surrounding streets are already highly congested with traffic and car parking issues due to the close proximity of St. Andrews College (1,700 students, 250 teachers) and the Waimairi Tennis Club (at peak over the summer period Monday-Sunday).

Any increase in housing density in the Strowan community (that is either MRZ or HRZ) will magnify this existing, on-street carparking problem and traffic congestion as new housing developments are no longer required to provide any on-site carparking. Of particular concern is that the PC14 proposes to enable HRZ along Papanui Road and one block either side of Papanui Road which is obviously at a higher level of intensification than even MRZ. As there is little on-street carparking in the area, and no on-site carparking required for new residential developments, carparking associated with ALL of this intensification will further exacerbate the carparking issues in the Strowan community.

This also presents a health and safety issue in an area which has many young families and school children present - due to increased traffic congestion, cars double parking and parking over driveways particularly during peak times which would be further exemplified by a HRZ.

There are already pockets of significant flooding in rainfall events in Strowan – with Brenchley Avenue being one example where both the stormwater and wastewater networks do not cope in these events. HRZ intensification of the extent proposed in PC14 will exacerbate this across the neighbourhood. This is a known consequence of urban intensification in Christchurch (and elsewhere – recent Auckland flooding).

Amenity/Character Section 14.2.4.2 Policy – High quality, medium density residential development:

I suggest that the proposed HRZ which is shown to be almost continuous down Papanui Road and for at least one block either side of Papanui Road (including one side of Watford St) is not consistent with the stated intent of this Section/Policy above and it certainly does not support '...medium density residential development, which is attractive to residents, responsive to housing demands and reflects the planned urban built character of an area'

The wide streets and traditional style homes make the area unique are special to the residents. Some homes being +100 years old - this history and uniqueness can't and shouldn't be replaced. There are a number of prominent trees and landscaping on properties which reinforces both the perception and reality of quality open space 'around' buildings (and which clearly supports the Council's Urban Forest Plan 2023 initiative).

CHANGE FROM HRZ TO MRZ IN STROWAN – SO AS TO BE CONSISTENT WITH STATED INTENTION

"Section 14.2.7 Objective – High Density Residential Zone: a High density residential development near larger commercial centres, commensurate with the expected demand for housing in these areas and the nature and scale of commercial activities, community facilities, and multimodal transport networks planned or provided in the commercial centres". Strowan does not meet the above criteria (it is not located near a commercial centre).

I seek the council to review and identify Watford St and the area of Strowan, particularly those blocks in the vicinity of St Andrews College (including Watford St, Normans Rd, Halton St, Hawthorne St), as worthy of definition as an area which warrants zoning as MRZ not HRZ as proposed in PC14, as the impact of being a HRZ on infrastructure demand and amenity values is significantly greater than under MRZ.


I seek that this change be made by way of 'Area limited by Qualifying Matters' or other appropriate means for the following reasons:

- The Strowan area has existing significant infrastructure issues which pose a heightened health and safety risk if a MRZ or HRZ (including carparking, vehicle congestion, flooding issues which impact both stormwater and wastewater systems)
- The presence of St Andrews' College enhances and reinforces the character of the neighbourhood, however the impact of the College's current and future growth places pressure on the local community (in terms of carparking, traffic congestion). The Waimairi Tennis club is also another popular and great local destination which increases traffic congestion in the area.
- The amenity and aesthetic value of the neighbourhood would be negatively impacted. There is a character of older quality housing in the area. Many of these homes are +100 years old and contribute to the history and uniqueness of our suburb and city.
- The sense of community and 'village' feel which is present and increasing would be undermined by the scale of intensification which is proposed under HRZ;
- There are a number of green areas and prominent trees remaining in the neighbourhood which reinforces the quality of open space and clearly supports the Council's Urban Forest Plan 2023 initiative; but which would inevitably be threatened with the high level of intensification under HRZ as proposed in Plan Change 14.

Our proposed Housing and Business Choice Plan Change (14)

[Submitter Details](#)**Submission Date:** 30/04/2023**First name:** Linda**Last name:** Blake**Preferred method of contact** Email

Attached Documents

Name
Submission of L F Blake to CCC Proposed Change 14 

Submission of L F Blake to CCC Proposed Change 14

The national imperative

1. I recognize the imperative Council is under to adhere to Government's mandate of denser housing.

Effect on Christchurch

2. I applaud CCC for taking a stand in considering zoning and Qualifying Matters to propose a way to increase density in Christchurch which reduces the impact of nationally recommended strictures.

Qualifying Matters - Sunlight Access

3. I refer to the Sunlight Access Qualifying Matter 14.6.2.2 where the nationally recommended recession planes would mean 3 months of no sun in winter in Auckland, but 5 months in Christchurch.
4. You have recognized the different geographic locations and sun angles, and the colder temperatures in the south, and have sought ways to reduce that to 3 months in Christchurch. Your proposals go some way towards ameliorating that, with 14.15.30 minimum building setbacks and 14.15.31 daylight recession planes.
5. However, requiring a minimum height of 2 storeys in the High Density Residential Zone (proposed 14.15.41) **and** a minimum of 30-50% of habitable ground floor rooms 14.6.2.9 condemns those living in ground floors adjacent to multistorey buildings to no sun for 3 months. I oppose both these two proposed changes, as seasonal affective disorder (SAD) of reduced sun is a recognized medical condition and no sun for several months is not healthy.

Character of the Merivale area

6. Requiring all building development in the Merivale HRZ zone to meet a minimum of 2 storeys is not compatible with the existing character of the area. Substantial residential investment has been made in the area since the earthquakes, and more taller buildings will have bulk and dominance effects, as well as privacy and shading effects, (14.15.3) on the many family homes with established trees and gardens.
7. Increasing density this way will drive people away from the area, out of the central part of the city, when the intent is to increase population concentrations.

Other areas

8. The increase in density should be applied to areas of the city which also meet the proposed criteria for denser housing, (being on core transport routes and 800 metres walk to a bus stop), but which have not had residential investment since the earthquakes. Proposing greater density in those areas would drive re-development, raising the overall housing quality, as well as the quantity of homes, in Christchurch. Only now are developers looking towards those areas eg Williams recent development in New Brighton.

Linda Blake
30 April 2023

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details


Submission Date: 01/05/2023

First name: Andy

Last name: Hall

Preferred method of contact Email

Attached Documents

Name	
Amended HRZ	

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 01/05/2023

First name: Andy

Last name: Hall

Preferred method of contact Email

Consultation Document Submissions

Provision:

Not Stated

I seek the following decision from the Council

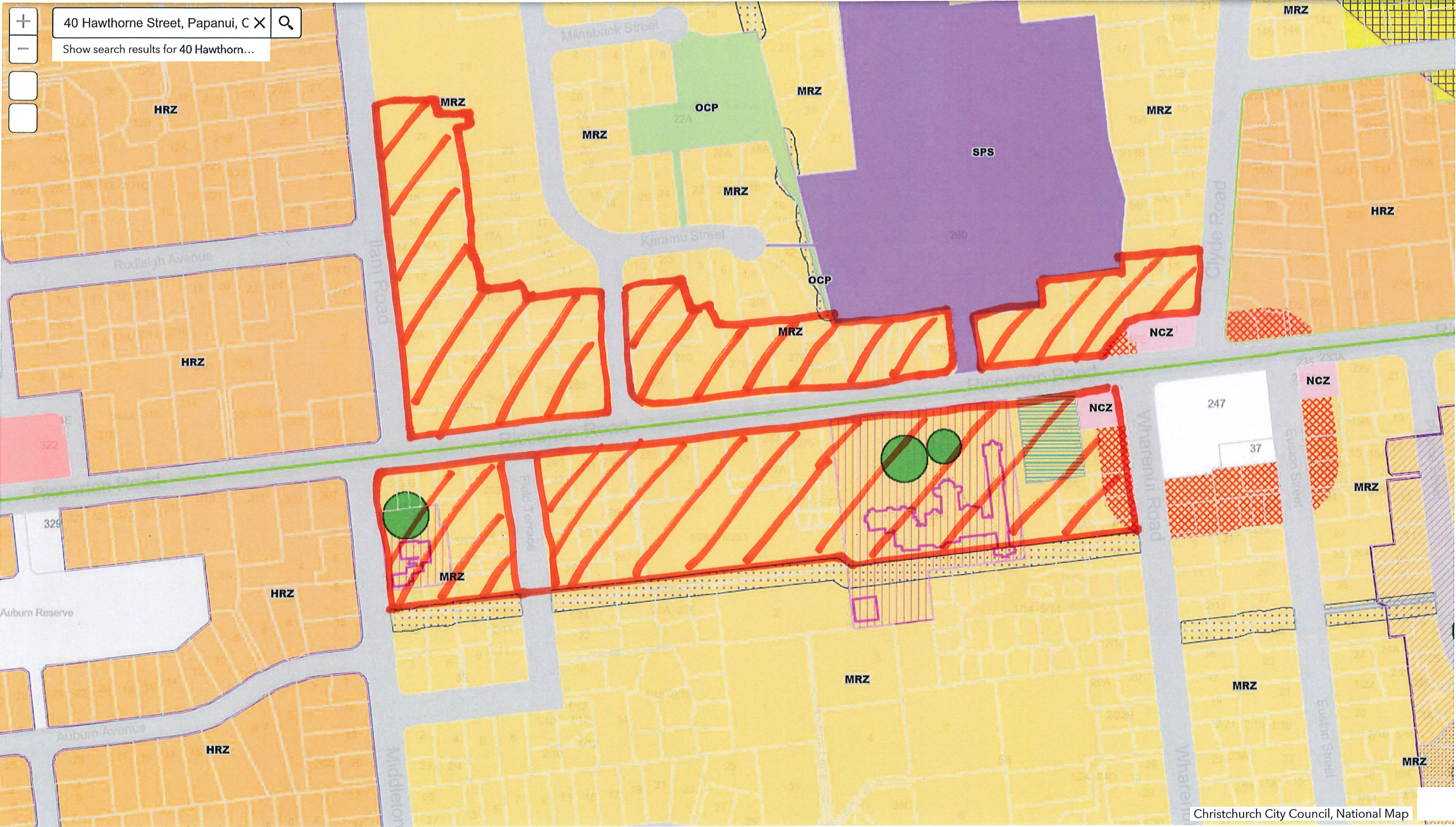
If seeking to make changes to a specific site or sites, please provide the address or identify the area:

Provision: Subdivision, Development and Earthworks, Chapter 14 - Residential, Planning Maps

Decision Sought: The waterway overlay on the Planning Maps to be stopped at my boundary.

My submission is that:

I would like to have a planning map amended. I own a property at 41 Rountree Street and the Planning Maps show a waterway overlay that extends into my property. There is no waterway on my land and as such I would like to have this overlay removed.





Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 01/05/2023

First name: Meg

Last name: Christie

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 7 Transport

Seek Amendment

I seek the following decision from the Council

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

My submission is that:

I see the District Plan has bike parking requirements for future housing developments but am concerned that they are not always going to be fit for purpose. Cycle parking, just like parking and storage a private car, needs to be easy to use, practical and secure.

For example, hanging bike racks, where the user has to lift their bike(s) up on its back wheel and hang the front wheel of a high hook, is not easy or safe for some elderly and youth, and those with physical disability or pain. It especially does not work for heavier bikes. bikes with baskets, cargo bikes, or e-bikes.

The current rules do not require bike parking to be indoors and secure. Cycle parking that is outside and visible invites theft, and nor does it adequately protect the bike from weather. Cycle parking also needs to be at ground level with no steps and have sufficient space for multiple bikes and/or larger bikes to be locked up, and also allow for electric bikes which are often heavier and more difficult to manoeuvre in small spaces.

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 01/05/2023

First name: Vivien

Last name: Binney

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Seek Amendment

I seek the following decision from the Council

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

At least , change the proposals.

Make the areas set for intensified dwellings outside the inner city 4 avenues limited to the 3 story and 3 per section . For the remaining suburban areas , limit the number of units per section to two ,not three and 2 stories only.

Developing your infrastructure for this will be easier .

In another 50-60 years time you will be planning to move the city further inland as the sea level rise becomes all too obvious so dont stuff up what we have too much before this.

My submission is that:

The scale of planned dwelling intensification is far to large.

Your plan can result in all Christchurch's leafy suburbs losing the very environment we enjoy Christchurch for. Our current population is approximately 390 ,000 . With the changes proposed , this population could easily be doubled in the same area.

Traffic congestion , impossible parking requirements will result as at least one vehicle per dwelling will swamp the streets.

Loss of gardens , trees and berms - result is an unpleasant environment not fit for children and with significantly increased rain run off and flooding risk to add to our climate change problems.

Slum dwellings. I have personally seen and also discussed with builders the rapidly and poorly built units crammed onto sections for maximal profit. No underground parking and usually no garage . There appears little incentive for developers to do otherwise .

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 01/05/2023

First name: Naretta

Last name: Berry

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Support

I seek the following decision from the Council

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

Retain all provisions in PC14 which enable sunlight access to be assessed as a qualifying matter in site development in the Medium Density Residential Zone.

My submission is that:

I support all provisions in PC14 which enable sunlight access to be assessed as a qualifying matter in site development in the Medium Density Residential Zone.

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 01/05/2023

First name: Stephen

Last name: Osborne

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Oppose

I seek the following decision from the Council

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

Deans Avenue Precinct does **NOT** become High Density Residential Zone (HRZ Residential) but remains a Medium Density Residential Zone (MRZ Residential)

The block South of Mayfair Street (Old Sales Yard) could be treated separately and would suit HRZ Residential development

My submission is that:

I oppose the Deans Avenue Precinct becoming a HRZ Residential Zone

The reasons for my opposition are as follows:

I am of the opinion that the Deans Avenue Precinct does not meet the criteria of Clause 14.2.7.2 of being within walking catchment of city centre (1.2 km) or town centre (Riccarton 600m).

Additionally making the DAP area HRZ will have the following negative impact

- Deans Avenue is the only access / egress road for the 700 properties within the precinct – increasing density will have an adverse effect on traffic using that major arterial road.
- Reduced viability of roof top solar power panels on existing properties.
- Availability of on street parking is already an issue – this will become a major problem with HRZ with no on-site parking requirements.
- The precinct already has significant proportion of rented accommodation housing short term residents. If the area becomes a HRZ it is likely to become a less unattractive place to live. Long term residents will move away leading to a loss of the current community spirit.

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 01/05/2023

First name: Alice

Last name: Mckenzie

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Oppose

I seek the following decision from the Council

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

I seek the following decision from the Council.

The Deans Avenue Precinct **MUST** remain a Medium Density Residential zone.

As the Precinct does **NOT** meet the criteria of **Clause 14.2.7.2** and the considering the other issues listed above, the Precinct should **NOT** become High Density Residential Zone (HRZ Residential)

The Old Sales Yard area South of Mayfair Street could be treated separately and would be significantly more suited to a major and properly planned HRZ Residential Development Such a developement can have a second access which crosses over the railway line and onto Blenheim Road via Lowe Street and Manderville Street

My submission is that:

Opposition to the Deans Avenue Precinct becoming a HRZ Residential Zone

The reasons for my opposition are as follows:

Deans Avenue Precinct does not meet the criteria of Clause 14.2.7.2 - The Deans Avenue area is **NOT** within walking distance of the city centre (1.2 km) or a local shopping centre (Riccarton 600m) and so does **NOT** qualify to be included as a High Density Residential Zone, as proposed in the new Plan Change.

Also there are many other concerning consequences should the precinct become a High Density Zone, all with negative impacts to the existing residents and any HRZ newcomers. There are also long-term effects both for the Christchurch Central area and the Deans Avenue Precinct.

- Higher density/buildings will negatively impact the effects of solar roof panels and even discourage their installation which is against all our personal aspirations and governmental efforts to mitigate climate change not just for us now but the for the future and sets a very poor example for other developments.
- Parking is already a concern for current residents as our streets are used by commuters, concert goers, sports fans, families, runners, walkers and other Hagley Park users. The area has also recently had a multitude of new (70 m2 and less) housing developments which also use the roads for their own and visitor parking ... Its already a major headache for us all. Higher density development with no on-site parking requirements will create a major social concern.

- Deans Avenue is the only access route all existing and future residents and is also a major route through Christchurch for general users. Higher density will lead to congestion and a prospective high accident area for through traffic, residents and people accessing the park.
 - There are already new housing developments in the area providing short term rental housing and this does not encourage community involvement or care {interest in our local functions is decreasing}. More of the same will negatively impact the desirability for long term residential use further decreasing the sense of community spirit.
 - A high-rise rental development adjacent to the mosque represents a major security risk - can you imagine the negative publicity for CCC and the 'heads that will roll' should another shooting incident occur from an adjacent high-rise property.
-

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 01/05/2023

First name: Lorraine

Last name: Raxworthy

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Oppose

I seek the following decision from the Council

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

My submission is that:

Do not wish to see 'infill housing' in our lovely Christchurch suburbs.

Properties need to have their sun & not be crowded out by high rise housing next to them.

Elderly do not want '2 up, 2 down' with stairs.

Also people with young families need room for their children to play in their own back yard. Not everyone wants to go to a playground.

Also have space for a garden , grow flowers /vegetables should they wish.

Having a garage & parking for themselves & family / friends visiting.

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 01/05/2023

First name: Melissa and Scott

Last name: Alman

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Oppose

I seek the following decision from the Council

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

We seek the following decision from the Council:

- That Helmores Lane, Desmond Street and Rhodes Street (to Rossall Street) be identified in the Christchurch District Plan as a Medium Density Residential zone and a Residential Character Overlay Area and be made subject to the rules that apply to Residential Character areas: or,
- If Helmores Lane, Desmond Street and Rhodes Street (to Rossall Street) are not included as a Residential Character Area, that the Area be zoned Medium Density Residential: and,
- That sunlight access be better protected by further amending the medium/high density southern boundary recession plane to 45° from 3m at the boundary: and,
- That neighbours along the southern boundaries of any proposed developments that involve non-compliances with height or access to sunlight rules can be notified of the required resource consents and to make submissions.
- Any further or other decisions that achieve the outcomes sought by this submission, or are required as a consequence of the relief we seek.

Dated: 1st May 2023.

Melissa and Scott Alman

My submission is that:

Submission on Proposed Plan Change 14 to the Christchurch District Plan

Submitters: Melissa and Scott Alman

2 Helmores Lane

Christchurch 8014

Our submission is that:

We are extremely concerned by the impact of the proposed rezoning to High Density Residential, on the character and coherence of our neighborhood at Helmores Lane, specifically the area consisting of Helmores Lane, Desmond Street and Rhodes Street (to Rossall Street) (the Area). Owners and occupiers of these properties, we included, have come to this Area to enjoy the amenity that the neighborhood offers and have invested heavily in securing their properties. We, along with our neighbors, highly value the existing environment and the benefits it provides in terms of pleasantness and lifestyle. Previously, that character had been acknowledged by the identification of the area as a special amenity area (SAM8).

It is accepted that the Area has been subject to some residential re-development over the years, especially since the Canterbury earthquakes, nevertheless it has retained a sense of character and coherence that, we consider, is somewhat unique. It has a relationship to the Avon River and to the parklands beyond, which are part of, and provide a link to the rest of, Hagley Park. It has remained an enclave of relatively spacious residential dwellings that has also enabled the retention of many trees both within the streetscape and within private properties.

There are also heritage items within the Area, including our home which Heathcote Helmore resided in, that have been identified in the proposals for PC14. Helmores Lane is a unique and significant area with a rich history dating back to the early settlement of Aotearoa/New Zealand. The lane is home to several other important historic buildings including number 16 Helmores Lane and Helmores Bridge, one of the oldest wooden bridges in Aotearoa. These structures and the surrounding neighborhood tell the story of the city's past. It is essential that we protect and preserve its heritage for future generations, especially given the large number of historic homes that were destroyed in the 2009/2011 earthquakes.

We are currently in the process of renovating our house and have considerable time and money adhering to the Christchurch city council's strict heritage conditions. Our architect has used original photographs from the Canterbury Museum to recreate some of the historic features of Heathcote Helmores house. It is also worth mentioning that until recently the Canterbury Museum had an entire room dedicated to Heathcote Helmore, in recognition of the enormous contribution he gave to the city through his design style and philosophy. We want to preserve the heritage nature of our property and the surrounding character community. Additionally, we believe that the monetary value of our home and our Neighbors homes will be impacted negatively.

Some might say that the change in zoning does not impact on this situation as the coherence will be maintained by existing landowners. This is arguable at best and in the case of the Area, overlooks that the changed zoning would itself change the equation for landowners and, more importantly those who might succeed them. The character of the Area is, in part, based on the longevity of ownership, which naturally means that changes in ownership can happen because of succession amongst other reasons. Newer owners, less invested in the character of the Area, would be free to take advantage of high-density status and, what is feared is a domino effect once the character that makes the Area so valuable to many, begins to be lost.

In addition, we note that there may also be further constraints to High (or even Medium) Density development in the area, which is identified as TC3 land and much of which is also in the Council's own Flood Plain overlay. That is not to mention additional potential parking issues that would likely be created if there was a proliferation of High Density accommodation.

We acknowledge that this may not be the only area in Christchurch that holds these fears. We are firmly of the view that such views should not be unnecessarily discounted, where they can be justified.

Within the framework that the Council has chosen to give effect to the new Medium Density Residential standards and the National Policy Statement on Urban Development, we consider that there is the ability to protect what is special about this area by:

- Rezoning the area Medium Density, and identifying the Area as a Residential Character Overlay Area, with the applicable rules (as attached): or

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 01/05/2023

First name: David

Last name: East

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 3 Strategic Directions

Seek Amendment

I seek the following decision from the Council

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

I seek clarity around definitions of the Coastal Hazard Management Zone and also the Tsunami Management zone. Clear definitions of the methodology behind such policy and reasoning as to why internationally rejected or highly unlikely scenarios are still being used as the basis for planning

I wish to elaborate further in my submission

My submission is that:

Council in their newspaper advertisement for PC14, indicated a number of qualifying matters. Item (vi) of the advertisement I am particularly interested in definitions of 'Coastal Hazard Management Zones' and 'Tsunami Management area', how they apply to the proposed plan and the methodology that substantiates the policies.

I am concerned that in developing these policies that we are adopting / utilising extreme scenarios and methodology and also creating an atmosphere of fear in communications with our communities

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 01/05/2023

First name: Peter

Last name: Evans

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Oppose

I seek the following decision from the Council

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

We require the Council to leave the zoning for our area as it is at present. We require that the Council pushback back very very strongly on these proposed changes in our zoning area.

My submission is that:

In my residential area I consider that it is very very important that you know the type of housing and their maximum stories always. We have known this in the past and it is a giant step backwards not to know this for the future. We have chosen to build our house in this area as at the time we did that we knew what could be built around us. Not knowing this going forward is not an acceptable position. I never ever thought that the zoning rules might be changed to allow buildings that you are now envisaging, allowing this in my area is not acceptable. Sunlight on our section and house is a very important in our life. We grow a lot of vegetables, have a very nice garden and as we are retired sunlight is good for our health and wellbeing. Having a lot less sunshine would certainly impact on our quality of life. Also to consider is if this proposal was to go ahead in our area there is a very good chance that the value of our property would decrease. This is not acceptable to us. Any high rise buildings would impact on the type of area we wish to live in. If we wanted to live in an area with high rise buildings we would live in the central city, this is not what we want to do and the type of area we wish to live in

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details


Submission Date: 01/05/2023

First name: Andrew

Last name: Evans

Preferred method of contact Email

Attached Documents

Name
RMA CCC plan change 2023 submitted 1-05-23 

Housing and Business Choice Plan Change (PC14) submission

from Andrew Evans of AE Architects Ltd, Christchurch

1/05/23

About the submitter:

I am an Architect, with over 30 years experience and have run my own firm for the last 20 years. I specialise in multi-unit residential units in Christchurch, working for many developers. I have designed (either currently in design or already built) over 650 units, in more than 100 separate multi-unit developments.

I submitted on the government's RMA -UD rules, but failed to get them to put in sensible recession plane regime, luckily the council has pushed back on this.

I have read most of the proposed change PC 14 briefly, its very complicated and sadly I'm too busy to really get into it.

Generally I support the RMA-UD and NPS-UD to reduce red tape, improve supply and improve densification

Sadly some of the specific rules the council proposes to add will increase red tape, increase costs and reduce supply but on a positive note some of their proposals are very sensible. The housing crisis has not gone away, its just gone a bit quiet at the moment due to the economy

Below are some cherry picked areas showing proposed changes

<p>Section 6.1 Noise:</p> <p>6.1.7.2.1 Sensitive activities near roads and railways : strongly oppose</p> <ol style="list-style-type: none"> 1) - the new rule requires an acoustic engineer for any site that is on a minor arterial or collector road- from my submission on district plan in 2014 <u>that is round 30-33% of all sites</u> this is a huge make work scheme. I recommend tossing the whole new section out and leaving the existing. Acoustic engineers already charge a lot and are busy- this will slow things down and their fees will go up 2) I cant tell if the new rules require mechanical ventilation (as I'm not an acoustic engineer), but if they do this adds huge cost of consultants, installation costs, and pain 3) the current rule have a standard solution (in appendix 6.11.4, for some reason this is still in the district plan) – this is simple and does not require an acoustic engineer 4) In fact, rather than make the acoustic rules worse how about delete the requirement for collector roads- this would dramatically reduce the number of sites affected, and update appendix 6.11.4 to add more flexibility
<p>Section 7 transport</p> <p>Table 7.5.7.1 Minimum requirements for private ways and vehicle access: oppose</p> <ol style="list-style-type: none"> 1) leave the table as it was for access widths, a large amount of site will be lost to these bigger legal and formed widths, we are trying to achieve more density not less <p>a subtle but important change to table 7.5.7.1: change (this also needs to be made to the : change 'for residential activities , the number of residential units' To 'for residential activities , the number of residential units <i>or parking spaces whichever is less</i>') – this is because many projects have few car parking spaces than units, so the rule which is supposed to help residential units actually works against it</p>
<p>Section 8 Earthworks</p>

Section 8.9 Earthworks: no change proposed: **strongly oppose- this needs changing**

- 1) The earthworks section 8.9 volumes desperately needs to be revised- just about any residential driveway anywhere needs a resource consent, it needs to change (Mayor Mauger ran his campaign on changing this I recall)
- 2) Section **8.9.2.1** Table 9 has maximum of both fill and excavation of 20cum – a normal driveway can be 50+ cum easily of both fill and excavation, often more, the rule needs to change or pretty much every residential project in Christchurch should really have a resource consent.

Section 14.5 Residential Medium density

14.15.1.3a RD1- residential design principles: **strongly oppose**

1) Discussion: **This just doesn't work**, you cannot design on principles because there is no objective standard to base the design– the council urban design department is already out of control, members there are ruling by arbitrary decree and making designers lives a misery they cannot be given this kind of open ended power, any development more than 3 units, ie: the majority cannot rely on woolly principles like 'Building bulk and dominance effects on surrounding properties' - that means nothing, an Architect cannot do a design he or she believes complies with this principle, but its entirely at the opinion of the council, so hours of time and thousands of dollars can be spent doing the design, then hours & \$\$\$ arguing about the design and the hours & \$\$\$ redesigning, this is the regime we live with currently. Finding a solution to this terrible quandary that I can see apart from getting really prescriptive (which in some ways might be worse) would be to have an independent person or committee that is not appointed by the council who would have the ability to rein in some of the more zealous member of the councils urban design team when they go too far. The council planners are supposed to balance this but they tend to get captured by the urban design department.

2) If the design principles don't get deleted maybe increase the number of units from 4 or more units to say more than 6 or more units as smaller developments have less effect than larger ones

14.5.2.2c-e Landscaped area and tree canopy cover: **strongly oppose**

Discussion: This rule has all the hall marks of a council fee grab chasing the latest trendy moral panic of tree loss, it will provide a negative incentive to develop & intensify, it will also add a large amount of red tape trying to calculate what this cost will be.

From Stats New Zealand only 1%* of the total land area in New Zealand is urbanised so this is not a national problem, if it is a problem it is a very localized problem as people have the ability in Christchurch to be around trees in a short period of time- the Port Hills, Hagley Park, Otakaro Avon River Corridor, local parks & reserves, street trees and obviously outside Christchurch in the other 99% non-urbanised areas.

Negative incentive: I can see it adding easily \$2000-4000 per project, but it might be more (1-2 large mature trees trees) to pretty much any multi-unit development, that's a guess, I have not seen any council analysis on a standard current development to see what it would add. Every cost makes it harder to develop, it all adds up. I assure you a developer does take an extra \$2-4k cost for no return very seriously

Red tape: how is it calculated: I tried to follow the trail & its not easy- I ended up at a excel spreadsheet with very large minimum berm and planting widths for most trees & a very unsubtle table of Size and soil guide which gives projected canopy size- are we going to have to hire an arborist or landscape architect for every project? This is not making

(see <https://ccc.govt.nz/environment/trees-and-vegetation/tree-and-urban-forest-plan/tree-planting-guide>)&

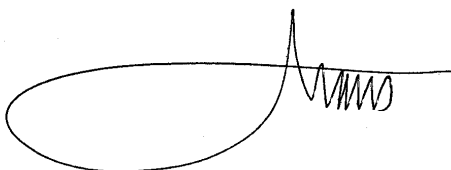
*<https://www.stats.govt.nz/news/new-report-shows-impact-of-demands-on-land-in-new-zealand> "While urban land cover continues to make up one percent of total land area in New Zealand, we can see that urban and residential expansion is outwards onto productive land, which creates tension between the use of land for housing and land for agriculture."

<p>14.4.2.4c Site Coverage: support</p> <p>1) excluding some the eaves and guttering from site coverage allows eaves to happen, less risk of leaky building, more design flexibility</p>
<p>14.5.2.5c i One bedroom/ studio unit outdoor living area: deleting the 16sqm oppose</p> <p>1) put back the 16sqm allowance for ground floor outdoor living area- this is worse than the current plan!!! 1 bedroom units are hard enough to stack up financially yet the most needed unit type*</p> <p>*One bedroom units are clearly needed- graphs from stats NZ information 2018- only round 5% of Christchurch units have 1 bedroom, yet about 25% of household in Christchurch only have 1 occupant!</p>
<p>14.5.2.6 Height in relation to boundary: Strongly support but with amendment</p> <p>1) well done the council I believe the revised recession planes they have come up with are a good compromise on the very excessive central government law</p> <p>2) the only amendment I have is that this qualifying matter needs to be sorted at the highest priority - there are many projects on hold (possible hundreds of units) that cannot go anywhere till this is resolved</p>
<p>14.5.2.7 Minimum building setbacks</p> <p>14.5.2.7 iii: support -good work the council on allowing eaves and gutters in the street set back, this allows eaves to happen, less risk of leaky building, more design flexibility</p> <p>14.5.2.7 iv: support -again, good work the council on allowing accessory buildings in the side/ rear boundaries, as per the status quo and reduces a lot of space wastage</p>
<p>14.5.2.9 i Street scene amenity and safety –road boundary non-arterial fences: seek amendment</p> <p>1) change fence height from 1.5m to 1.8m OR allow 1.5m + 0.3m of partially transparent above- council then provides allowable examples of partially transparent e: 20mm gaps + 90mm timber slats</p> <p>2) a 1.5m fence does not allow sufficient privacy if it adjoins a units outdoor living space, it needs to be tempered somewhat by slats or fins so it is not as harsh</p>
<p>14.5.2.10 Windows to street: seek amendment</p> <p>1) 14.5.2.10a :20% is a big percentage if the building faces south- that's a lot of heat loss, loss of privacy: I would suggest reducing to 15% and retaining the exclusion for roof space</p> <p>2) Should item 1) not be acceptable then revise 14.5.2.10e to reduce the concession from 17.5% down to 15%</p> <p>3) 14.5.2.10 b: remove all mention of a single gable- just exclude all roof spaces from the rule, if you have multiple units facing the street only one will get the concession, as above- 20% is a big percentage, 20% including roof space that is massively overglazed. Also important to remove any mention of gable as that excludes mono-pitch roofs. Note the perverse incentives of including any roof space in the % window area is it will encourage hip roofs (no gables, no monopitches just hips or huge windows), you will change the character of the cities architecture if the rule is not adjusted</p>
<p>14.5.2.13b Service,storage,and waste management spaces : strongly oppose</p> <p>1) Having required storage in each unit is a nightmare – -this is worse than the current rules, the MDRS/ new rules are supposed to make it easier to do multi-unit dwellings, it might sound drab but please let the market decide & stop micromanaging; if future occupants want to add a garden shed they can, if they don't they wont don't make developers add them, its more cost for both design and construction & red tape.</p> <p>2) should the panel not accept deleting this clause then at least excludes garages- garages are basically storage areas and should be allowed to be included in the storage requirements, it is non-sensical to not allow this (in fact if you have a garage it should be deemed to comply)</p>
<p>14.5.2.17 Location of outdoor mechanical ventilation: strongly oppose</p> <p>1) heat pump units have to go somewhere, the most logical place often is near the accessway or road boundary- please stop micromanaging & retain the status quo- the council doesn't ask and they turn up in a logical spot, the MDRS/ new rules are supposed to make it easier to do multi-unit dwellings not making them worse.</p> <p>2) Should the IHP decide to keep this crazy rule at least adjust it to say heat pump units can be placed in these locations as long as they are screened (there are plenty of proprietary but expensive screens out there) but please just get rid of it</p>

14.6 High Density Residential zone
14.6.1.3 RD2 Restricted discretionary activities : strongly oppose same commentary as 14.15.1.3a RD1 above
14.6.2.2 Height in relation to boundary: support - generally same commentary 14.5.2.6
14.6.2.3 setbacks: support - see comments in commentary above section 14.5.2.7
14.6.2.5 Building separation: oppose 1) this rule is a bit woolly: does this apply to buildings on neighbours sites? If so and the neighbours builds close to the boundary this could have a big effect or scupper building 2) if the rule only applies to units on the site in question & not neighbours then its probably ok
14.6.2.6 Fencing and screening: seek amendment - same commentary as 14.5.2.9 i above
14.6.2.7 d-f Landscaped area and tree canopy cover: strongly oppose - same commentary as 14.5.2.2c-e above
14.6.2.7c: seek amendment alter clause to 'The 20% landscaped area may be provided as a sum across the site, as long as there is a minimum dimension of 0.45m . (was 0.6m) 1) 0.45m is more than enough to grow shrubs, when designing multiunit dwelling reaching 20% is hard, and with things tight 0.6m is often hard to achieve, even 0.45m wont be easy
14.6.2.8 Windows to street; seek amendment same commentary as 14.5.2.10 above
14.6.2.10c Outdoor living space: support 1) allowing 15sqm for studios and 1 bedroom units is sensible, do the same for medium density zone as well
14.6.2.11b Service space, storage and waste management: strongly oppose same commentary as 14.5.2.13b above
14.6.2.12 a i Building Coverage: eaves/ gutter: support same commentary as 14.4.2.4c above
14.6.2.12 a ii: 60% cover: seek amendment : 1) just allow 60% without all the micromanaging- delete requirements A-D. The zone is supposed to be high density and a 50% site coverage is not high density, just allow blanket 60%
14.6.2.15 Location of outdoor mechanical ventilation: strongly oppose same commentary as 14.5.2.17 above

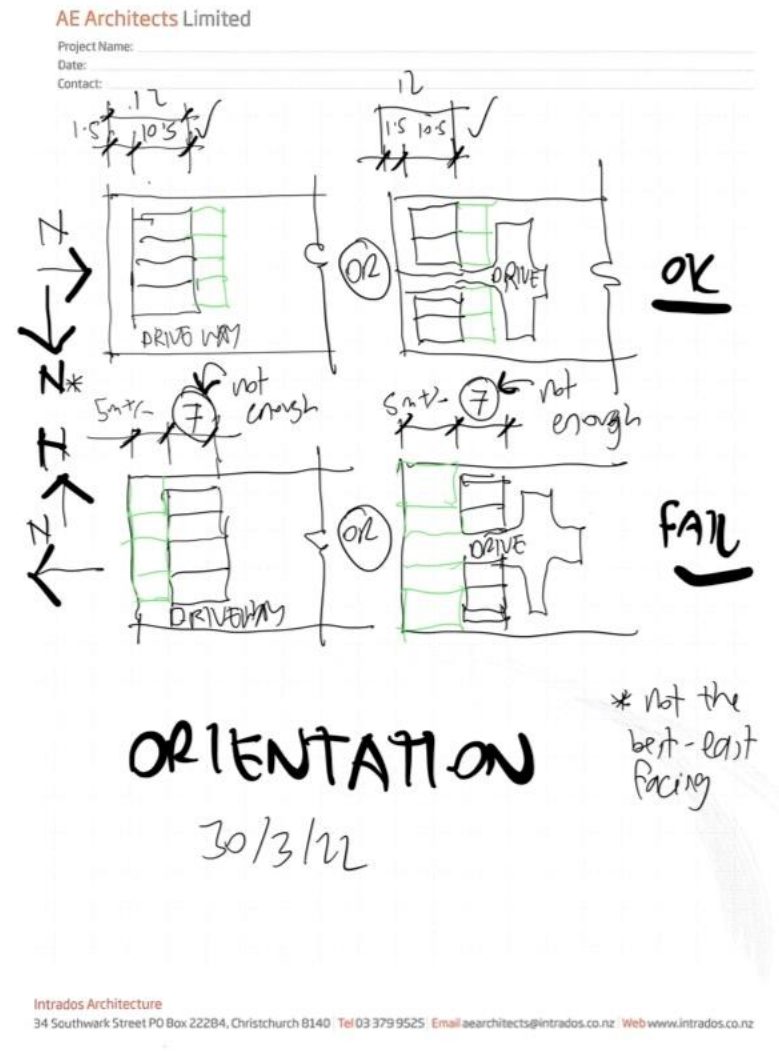
I hope at least some of these suggestions will be taken on board so that there are better design outcomes & the new rules function better.

Yours sincerely



Director A E Architects Ltd.


Appendix A Orientation study



Our proposed Housing and Business Choice Plan Change (14)

[Submitter Details](#)**Submission Date:** 01/05/2023**First name:** Blair**Last name:** McCarthy**Preferred method of contact** Email

Attached Documents

Name	
Tim P Plan Change14 Summary Submission	

Christchurch District Plan

Plan Change 14

DRAFT FIVE

I live in Strowan and I am concerned that the proposed Housing and Business Choice Plan Change 14 (PC14) will have a significant negative impact on the character and quality of our immediate and surrounding neighbourhood as well as placing unacceptable pressure on transport, stormwater and wastewater infrastructure in the local area. In particular, the proposed change for High Density Residential Zone (HRZ) in a continuous strip parallel to Papanui Road through Strowan (stretching from Papanui Road to Watford Street), without any requirement for new developments to provide any on-site parking, will place significant additional pressure on basic transport infrastructure such as on-street carparking and traffic congestion as well as pressure on the local stormwater and wastewater networks; all of which are not coping currently.

1. INFRASTRUCTURE

Relevant PC14 clause references and extracts are given in **RED itallics** following

Section 14.2.8.5 Policy – Infrastructure servicing for developments

a Ensure that developments are serviced with all required infrastructure in an effective and efficient manner

Section 14.2.8.6 Policy – Integration and connectivity

c Avoid significant adverse effects and remedy or mitigate other adverse effects on existing businesses, rural activities or infrastructure

I suggest that it is universally accepted that ‘infrastructure’ includes adequate carparking and a safe and effective transport network which does not contribute to traffic congestion. and a functioning and effective stormwater and wastewater network.

My specific concerns in relation to the impact of the proposed changes on this infrastructure in particular in my community of Strowan are as follows:

- the supply of on-street carparking spaces currently cannot keep-up with the demand for carparking, resulting in the very recent expansion of time-based (two hour maximum) parking restrictions on most surrounding streets. A major contributor to the on-street carparking issue is St Andrews’ College, which defines the southeast limit of Strowan in this area. The school has a total population of around 2000 and is growing with a large waiting list for entry. (At a lower level but still worthy of mention are the carparking issues associated with Waimairi Tennis Club, which is also in our neighbourhood). The proposed change to HRZ in the Strowan community will magnify this existing, significant on-street carparking problem;
- the existing traffic management issues associated with St Andrews’ College also pose a significant health and safety issue – from morning and afternoon congestion in Normans Road and surrounding streets at school drop-off and pick-up times, drivers double parking and parking over broken yellow lines and ‘rat running’ around the Strowan streets to seek to avoid congestion, causing delays and congestion at intersections linking with surrounding

primary roads including Papanui Road and Strowan Road. All of these issues will be exacerbated by the proposed intensification of residential development in the community but especially by the proposed HRZ over many blocks,

Relevant PC14 clause references and extracts are given in **RED itallics following**

Section 14.6.2 Built form standards

a The following built form standards shall be met by all permitted activities and restricted discretionary activities RD2, unless otherwise stated.

Advice note:

1. There is no spare, or limited, wastewater, storm water, or water supply infrastructure capacity in some areas of Christchurch City which may create difficulties in granting a building consent for some developments. Alternative means of providing for those services may be limited or not available. Compliance with the District Plan does not guarantee that connection to the Council's reticulated infrastructure is available or will be approved. Connection to the Council's reticulated infrastructure requires separate formal approval from the Council. There is a possibility that approval to connect will be declined, or development may trigger the need for infrastructure upgrades or alternative servicing at the developer's cost.

My specific concerns in relation to the impact of the proposed changes on the stormwater and wastewater networks in our local community of Strowan are as follows:

- there are already pockets of flooding in rainfall events in Strowan – with Brenchley Avenue being one example where both the stormwater and wastewater networks do not cope in these events. HRZ intensification of the extent proposed in PC14 will exacerbate this across the neighbourhood. It is clear that urban intensification produces an increased level of hard surfaces (eg roof and paved areas) and a consequential reduction in 'soft' surfaces (eg grass, landscape areas); all of which increases the runoff rates of stormwater discharge to the side channel and gives rise to infiltration of this uncontrolled stormwater into the wastewater system. This already causes overflows and resulting sewage contamination in pockets of the Strowan area and will lead to contamination of waterways, streams and surface water. All of these issues will be exacerbated by the proposed intensification of residential development in the community but especially by the proposed HRZ over many blocks, immediately adjacent to the current problem areas.

2. AMENITY/CHARACTER

Relevant PC14 clause references and extracts are given in **RED itallics following**

Section 14.2.4.2 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 reflects the planned urban built character of an area

I suggest that the proposed HRZ which is shown to be almost continuous down Papanui Road and for at least **one block** either side of Papanui Road is not consistent with the stated intent of this Section/Policy above and it certainly does not support '*...medium density residential development,*

which is attractive to residents, responsive to housing demands and reflects the planned urban built character of an area'

My specific concerns in relation to the impact of the proposed changes on the amenity/character in particular in my community of Strowan are as follows:

- the Strowan neighbourhood has an amenity character and fabric and a sense of community which is very attractive to residents, which is highly valued and worthy of retention. This is comprised of a number of elements including:
 - there is still a significant proportion of older, quality homes;
 - the homes are typically on larger than average sections so a sense of open space is still present;
 - there are a number of prominent trees and landscaping on properties which reinforces both the perception and reality of quality open space 'around' buildings (and which clearly supports the Council's Urban Forest Plan 2023 initiative);
 - the small number of new homes which have been built are typically two storey, with the scale, density and quality largely in keeping with the existing character and built form elsewhere in the Strowan community.

3. LACK OF CARPARKING PROVISION FOR VULNERABLE MEMBERS OF OUR COMMUNITY

Relevant PC14 clause references and extracts are given in **RED itallics** following

Section 7.2.1.2 Policy – High trip generating activities

ix provide for the transport needs of people whose mobility is restricted

Section 7.2.1.5 Policy – Design of Carparking areas and loading areas

iii be accessible for people whose mobility is restricted

At a general level, the removal of the requirements for new residential housing developments to provide for any on-site parking, will have a significant and disproportionate impact on a number of vulnerable groups in our community. These groups include

- people with disabilities;
- elderly residents; and
- families with children.

This impact will be significant on both

- existing residents and
- residents living in new developments

as increasingly they and their visitors will not be able to expect and/or rely on their ability to park close to their place of residence. This will be exacerbated significantly in the Strowan area where the current on-street carparking supply does not meet demand and this is a further reason why the proposed HRZ must not be implemented.

4. CHANGE FROM HRZ TO MRZ IN STROWAN – SO AS TO BE CONSISTENT WITH STATED INTENTION

Relevant PC14 clause references and extracts are given in **RED itallics** following

Section 14.2.7 Objective – High Density Residential Zone

a High density residential development near larger commercial centres, commensurate with the expected demand for housing in these areas and the nature and scale of commercial activities, community facilities, and multimodal transport networks planned or provided in the commercial centres

Section 14.2.7.2 Policy – High density location

a Enable high density residential development within walking catchments of the:

- i. City centre zone;*
- ii. Town Centre zones of Riccarton, Papanui, and Hornby; and*
- iii. Other larger commercial centres zoned as Town Centres and Local Centres; to a degree that responds to the planned scale and nature of each centre group and the range of activities planned or provided there.*

Clearly the part of Strowan proposed as HRZ does not meet these criteria as it is not located near or adjacent to a commercial centre.

I suggest therefore that the significant infrastructure pressure and other issues which I have highlighted in this submission, which are already impacting the Strowan community particularly in the vicinity of St Andrews' College, could be mitigated by Council following the approach which they themselves have outlined in the Consultation document. That is, by limiting the HRZ as detailed (north from the Merivale commercial centre to Heaton Street/Innes Road and south from the Papanui commercial centre to Blighs Road) and not extending the HRZ along this stretch of Papanui Road through the Strowan community.

Conclusion/Recommendation

I urge Council to identify the area of Strowan, particularly those blocks in the vicinity of St Andrews College, as worthy of definition as an area which warrants zoning as MRZ not HRZ as proposed in PC14, as the impact on infrastructure demand and amenity values under HRZ is significantly greater than under MRZ.

- the sense of community which is present would be undermined by the scale of intensification which is proposed under HRZ;
- there are a number of prominent trees remaining in the neighbourhood which reinforces the quality of open space amenity and character of our community, and which clearly supports the Council's Urban Forest Plan 2023 initiative; but which would inevitably be threatened with the high level of intensification under HRZ as proposed in Plan Change 14.

I am keen to speak to my submission if that is possible so as to further outline my suggestions of an appropriate response to the significant issues which already exist currently in our neighbourhood.

OR I am keen to support others in my community who I know are highlighting similar concerns in their submissions. **You need to decide which you say here for yourself**

Thank you for the opportunity to make a submission.

DRAFT

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 28/04/2023

First name: David

Last name: Mountfort

Organisation: The Glenara Family Trust

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 13 Central City

Seek Amendment

I seek the following decision from the Council

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

My submission is that:

See the submission attached.

Attached Documents

Name
The Glenara Family Trust

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 28/04/2023

First name: David

Last name: Mountfort

Organisation: The Glenara Family Trust

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 13 Central City

Seek Amendment

I seek the following decision from the Council

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

The Trust seeks that Change 14 be approved, with the addition to Rule 13.14.4.3, of Restricted Discretionary Activity status for the construction of residential activities on a site listed in Appendix 13.14.6.2 that do not comply in all respects with the applicable activity and built form standards, along with the appropriate matters of discretion. Such provisions could be modelled on Rule 14.5.1.3 RD15-31 for similar proposals in the MDZ.

The Trust does not oppose a limitation of building height to 3 storeys or less on its land, so does not seek the inclusion of RD14 from that list.

Alternatively, such provision could be made in Rule 13.14.4.1.3 as a single omnibus RDA that cross-refers to Rule 14.5.1.3 RD15-RD31.

My submission is that:

Please see full submission attached.


Change 14 has largely adopted the provisions of PC11, but with one new matter of concern.

Rule 13.14.4.1 P33 permits the erection of new dwelling units on sites listed in Appendix 13.14.6.2 as a permitted activity provided that they comply with all the activity standards and built form standards for the Medium Density Residential Zone (the MRZ). However there is no provision under proposed Rule 13.14.4.3 as a restricted discretionary activity for a residential activity which would not comply with all those standards while would not creating undue adverse effects.

As an example of this, Rule 13.14.4.1 P33 permits the erection of new dwelling units on sites listed in Appendix 13.14.6.2, as a permitted activity, to a maximum of 3 units. As there is no applicable Restricted Discretionary Activity under Rule 13.14.4.3, a fourth unit would be a non-complying activity in the SPOARCZ, regardless of whether or not there would be any adverse effects. The same would apply for any other minor breach of an activity or built form standard. The Trust considers that this would create an excessive and inappropriate level of difficulty for such proposals.

Put another way, while Rule 13.14.4.1 for the River Corridor Zone adopts the standards of Chapter 14 Medium Density Residential for its Permitted Activities, it does not adopt any corresponding rules for restricted or fully discretionary activities.

Attached Documents

Name
The Glenara Family Trust 

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 28/04/2023
First name: David **Last name:** Mountfort
Organisation: The Glenara Family Trust
Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 13 Central City

Seek Amendment

I seek the following decision from the Council

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

The Trust seeks that Change 14 be approved, with the addition to Rule 13.14.4.3, of Restricted Discretionary Activity status for the construction of residential activities on a site listed in Appendix 13.14.6.2 that do not comply in all respects with the applicable activity and built form standards, along with the appropriate matters of discretion. Such provisions could be modelled on Rule 14.5.1.3 RD15-31 for similar proposals in the MDZ.

The Trust does not oppose a limitation of building height to 3 storeys or less on its land, so does not seek the inclusion of RD14 from that list.

Alternatively, such provision could be made in Rule 13.14.4.1.3 as a single omnibus RDA that cross-refers to Rule 14.5.1.3.RD15-RD31.

My submission is that:

Change 14 has largely adopted the provisions of PC11, but with one new matter of concern.

Rule 13.14.4.1 P33 permits the erection of new dwelling units on sites listed in Appendix 13.14.6.2 as a permitted activity provided that they comply with all the activity standards and built form standards for the Medium Density Residential Zone (the MRZ). However there is no provision under proposed Rule 13.14.4.3 as a restricted discretionary activity for a residential activity which would not comply with all those standards while would not creating undue adverse effects.

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Attached Documents

Name
The Glenara Family Trust

Submission On	Proposed Change 14 to the Christchurch District Plan
By	The Glenara Family Trust
Submission Lodged By	David Mountfort, Planning Consultant and Authorised Agent for the Trust

The Trust's submission is that:

The Trust is the applicant for Plan Change 11 (PC11), a privately-requested plan change to the Christchurch District Plan. PC11 has been overtaken by Change 14. Most of the provisions of PC11 have been adopted in Change 14, so the hearing of PC11 has been adjourned, at the request of the Trust, pending the outcome of Change 14.

The Trust is the owner of properties at 254 and 256 Fitzgerald Avenue and 5 Harvey Terrace, Richmond. These properties are in the Specific Purpose Otakaro Avon River Corridor Zone (the SPOARCZ). Under Change 11 the Trust sought the inclusion of 254 Fitzgerald Avenue and 5 Harvey Tce in the table in Appendix 13.14.6.2, which lists sites where there were activities existing prior to the Canterbury Earthquakes. No 256 Fitzgerald Avenue is already listed in that table. Provisions of the zone enable continuation of such pre-earthquake activities, under Rule 13.14.4.1 Permitted Activity P33.

No 256 Fitzgerald Avenue is currently developed with four residential units which were repaired after the earthquakes and are to be retained. Some surplus land may be transferred to the other two properties by subdivision. No's 254 Fitzgerald Avenue and 5 Harvey Tce are vacant. Earthquake - damaged residential units there were demolished.

Under Change 11 the Trust sought the inclusion of the sites, which also contained pre-earthquake activities in the Table, and corresponding provisions.

Change 14 has largely adopted the provisions of PC11, but with one new matter of concern.

Rule 13.14.4.1 P33 permits the erection of new dwelling units on sites listed in Appendix 13.14.6.2 as a permitted activity provided that they comply with all the activity standards and built form standards for the Medium Density Residential Zone (the MRZ). However there is no provision under proposed Rule 13.14.4.3 as a restricted discretionary activity for a residential activity which would not comply with all those standards while would not creating undue adverse effects.

As an example of this, Rule 13.14.4.1 P33 permits the erection of new dwelling units on sites listed in Appendix 13.14.6.2, as a permitted activity, to a maximum of 3 units. As there is no applicable Restricted Discretionary Activity under Rule 13.14.4.3, a fourth unit would be a non-complying activity in the SPOARCZ, regardless of whether or not there would be any adverse effects. The same would apply for any other minor breach of an activity or built form standard. The Trust considers that this would create an excessive and inappropriate level of difficulty for such proposals.

Put another way, while Rule 13.14.4.1 for the River Corridor Zone adopts the standards of Chapter 14 Medium Density Residential for its Permitted Activities, it does not adopt any corresponding rules for restricted or fully discretionary activities.

The Trust seeks the following decision from the Council

The Trust seeks that Change 14 be approved, with the addition to Rule 13.14.4.3, of Restricted Discretionary Activity status for the construction of residential activities on a site listed in Appendix 13.14.6.2 that do not comply in all respects with the applicable activity and built form standards, along with the appropriate matters of discretion. Such provisions could be modelled on Rule 14.5.1.3 RD15-31 for similar proposals in the MDZ.

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Alternatively, such provision could be made in Rule 13.14.4.1.3 as a single omnibus RDA that cross-refers to Rule 14.5.1.3.RD15-RD31.

Signed on behalf of the Trust



David Mountfort, Authorised Agent

26 April 2023

Contact Details

Postal 250A Ashgrove Tce
Somerfield
Christchurch 8024

Email david@mountfortplanning.co.nz

Telephone 027-256-6326
My preferred form of contact is by email.

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 01/05/2023

First name: Andrew

Last name: Laurie

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 10 Designations and Heritage Orders

Seek Amendment

I seek the following decision from the Council

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

The area near and including Ashgrove Tce, Fairview St and Cashmere View St should be a Heritage Value Residential Character zone, and a resource consent should be required before any development can proceed.

My submission is that:

On Plan Change 13/14: The area near and including Ashgrove Tce, Fairview St and Cashmere View St should be designated a Heritage Value Residential Character zone, because the character and style of houses in this area are of value and enhance the aesthetic of the neighbourhood, which would be compromised by the type of buildings permissible under the MRZ rules.

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 01/05/2023

First name: Wayne

Last name: Keen

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Oppose

I seek the following decision from the Council

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

Assist developers and builders to complete builds on land currently sitting vacant within the city.

My submission is that:

We have a 2 Storey house next-door built-in line with the council requirements and still shades our lawn, your proposal would shade our whole house.

This is where we live and raise our children, not just places to sleep and eat, they need too to relax and play.

The council already has opposition to shipping containers stored in Ferrymead stacked to the height of your proposed houses.

CHCH has adequate land to build on, the slow process is due to a lack of builders, we like many others had to build after the earthquake, which we have done on a new site and 2 flats were built on our old larger section, a win win for everyone.

Your proposal is flawed as demonstrated in Aymes rd where Medium density build is happening the water and sewer is inadequate for the increase in services for the number of units being built.

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 01/05/2023

First name: Rebecca

Last name: Perkins

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Oppose

I seek the following decision from the Council

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

Remove the areas close to Papanui road from the HRZ zone, especially those that are prone to flooding and do not have nearby stormwater systems that cope with heavy rain.

My submission is that:

The proposed areas for HRZ in Papanui, and specifically near Watford Street and Brenchley Avenue, will put pressure on existing stormwater systems that already struggle to cope in heavy rain. These areas regularly flood and both roads (Brenchley Avenue, and the section of Watford up to Normans Road and Halton Street) closed at least twice in the last year. On 10th April 2023, The Press newspaper reported that the Christchurch City Council's own specialist staff report into flood prone areas in Christchurch found them impossible to fix, and residents must accept this. In these circumstances, it seems possible at the very least for the CCC to plan in order to not make the problem worse by adding more properties and load to a struggling stormwater system.

These areas of Papanui are already experiencing heavy parking and traffic use. The vision for the HRZ in the plan, extending out from Papanui road, would worsen this.

I realise the MRZ is a government directive but with that change, too, some consideration needs to be given to upgrading stormwater infrastructure in this area, rather than adding to its loading in severe rain events. The Press article of 10th April, p.1, suggests the investigation into fixing flood prone areas needs to have more input from planners as you look to the future. Thank you for your consideration of these points.

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 01/05/2023

First name: Tom

Last name: Gilbert

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 6 General Rules and Procedures

Seek Amendment

I seek the following decision from the Council

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

I would like an amendment to the proposed plan change so that high density housing is only applicable to those properties with a street frontage to Papanui Rd - not a block back.

My submission is that:

My family and I have two properties on Brenchley Ave - 25 and 1/23 (the latter being a rental which we let to an elderly couple). We bought here because it is a nice family environment in which to raise our two children both still at school. The proposed increase to high housing density on Papanui Road and one block back to Watford street (a few meters from our house) would fundamentally alter our environment and its amenity values. I understand that medium density housing is likely unavoidable but high density housing in this area is unpalatable. Not only will it change the feel and character of the area but our infrastructure will not cope.

There is already a premium on parking and notable congestion on the roads in the area mainly as a result of nearby schools and the adjoining tennis club. Navigating the streets is difficult and dangerous especially at peak times which would be made much worse by high density housing where garaging is not required.

Further the stormwater infrastructure in the area does not currently cope with well documented flooding. The council thus far has refused to address this in any material way. Greater housing intensification will undoubtedly exacerbate this problem by reducing the land's capacity to absorb water and creating additional run-off. This will put our properties in jeopardy more frequently alongside the many vehicles that would have no off-street parking to retreat to.

In short this proposal to create high density housing in what is a peaceful family enclave is, with respect, crazy. This is not an industrial or commercial hub. Far from it. Whilst we might have no option but to live with medium density housing, high density is optional and undesirable.

Thanks for taking the time to read this and note our genuine concerns. I would be happy to speak to this submission along with many of my neighbours.

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 01/05/2023

First name: Elizabeth

Last name: Sawers

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Oppose

I seek the following decision from the Council

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

Remove housing intensification in the Bush Inn/Church Corner area.

My submission is that:

Church Corner should not have housing intensification up to 6 storeys high.

The area directly impacted by these changes around the Bush Inn centre is part of the Church Corner 'village', Bush Inn is comparable in size to the Bishopdale Mall which has less housing intensification identified. The area identified around Bush Inn is not around the immediate University area so there is less benefit to students.

Parking is already limited and restricted in these streets, and housing intensification would make this worse and directly impact families

It would seem the Council has sidestepped streets with higher value houses such as Clyde Road that would benefit both students and the Riccarton area, and are penalising lower income long term home owners.

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 01/05/2023

First name: Geoff

Last name: Tune

Preferred method of contact Email

Consultation Document Submissions

Provision: Chapter 5 Natural Hazards

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:

[14.13.3.2 Daylight recession planes](#)

project beyond a building envelope constructed by **recession planes** from points **3 meters** (~~2.3 metres~~) above boundaries with other sites as shown in Appendix 14.16.2, **with replaced MDRS angles i.e 55°** (~~diagram C~~) except that: where an internal boundary of a site abuts an access lot, access strip, or access to a rear lot, the **recession plane** may be constructed from points 2.3 metres above the furthest boundary of the access lot, access strip, or access to a rear lot or any combination of these areas; where buildings on adjoining sites have a common wall along an internal boundary the **recession planes** shall not apply along that part of the boundary covered by such a wall. Where the building is located in a Flood...


My submission is that:

Areas that CCC is proposing to exclude from MDRS due to matters like heightened flood risk, preclude these areas from adopting a more appropriate recession plane control. While the prevention of medium density developments may be seen as desirable, the new 3m height at boundary and 55° angle should be adopted. This will better provide for development and allow progress in all areas while maintaining sensible measures of control.

Our proposed Housing and Business Choice Plan Change (14)

[Submitter Details](#)**Submission Date:** 01/05/2023**First name:** Hilton**Last name:** Smith**Preferred method of contact** Email

Attached Documents

Name
PC14 Desmond St Character Overlay (Proposed) 

PC14 – RESIDENTIAL CHARACTER OVERLAY RULES (PROPOSED)

CCC Summary of Proposed Changes

In recognition of the status of a Qualifying Matter, we propose introducing a resource consent requirement as a restricted discretionary activity, to help us better protect Character Areas. While some infill development will be allowed, we will have more ability to decline a resource consent where the design of a new house, or changes to an existing house, aren't in keeping with the Character Area.

Subdivision will also be more restrictive, depending on the zone and area. For example, within a certain Character Area an additional house may be allowed on an existing site, or to the rear on a new site, but it may be limited to between five and eight metres (one or two storeys, depending on building design). It may require a larger garden and existing trees to be retained, with the house or houses set further back from the street and other boundaries than would be allowed for in a general suburban area.

Rules for the Character Areas will differ depending on the character values of each area, as well as the District Plan zone in which the character area is located. The character values that are already being used to assess any development designs submitted to us are proposed to remain the same.

Proposed Rules (Medium Density Residential Zone)

Activity Status	Activity within a Character Area Overlay	Activity if not in a Character Area Overlay
Permitted	Within any Character Area Overlay, the interior conversion of an existing residential unit into two residential units.	No equivalent rule – no density limit
Controlled	In a Character Area Overlay, a. The erection of new residential unit to the rear of an existing residential unit on the same site, where it is: i. less than 5 metres in height; and ii. meets the built form standards applicable to the Character Area Overlay within which it is located. b. Any application arising from this rule shall not be limited or publicly notified.	
Restricted Discretionary	Residential units in the Character Area Overlay that do not meet Rule 14.5.3.2.7 – Number of residential units per site – maximum of 2 residential units per site.	No density limit.

Restricted Discretionary	<p>Within a Character Area Overlay:</p> <p>a. The demolition or removal of a building greater than 30m² on the site, relocation of a building onto the site, erection of new buildings and alterations or additions to existing buildings, accessory buildings, fences and walls associated with that development.</p> <p>b. This rule does not apply:</p> <p>i. where 14.5.3.1.2 C1 applies.</p> <p>ii. to fences that meet the applicable built form standard 14.5.3.2.12 for that Character Area;</p> <p>iii. to accessory buildings that are less than 30m² and located to the rear of the main residential unit on the site and are less than 5 metres in height; iv. to fences that are located on a side or rear boundary of the site, except where that boundary is adjacent to a public space.</p> <p>c. Activities that do not meet Built Form standard 14.5.3.2.6. d. Any application arising from this rule shall not be limited or publicly notified.</p>	
	Building height controls (dependent on the area, but the current Character Areas have 7m and 5.5 height limits proposed)	In most places, 11 metres
	<p>Character Areas have a range of other special limits on built form, dependent on the values of that particular Character Area, including:</p> <ul style="list-style-type: none"> - the width of building frontages - landscaping - setbacks (larger than typical) - building coverage - outdoor living space requirements - minimum glazing facing the street - fencing - garaging and car ports - building separation <p>Generally the built form requirements are stricter than the underlying zoning would otherwise allow.</p>	

	If these rules are not met, resource consent is needed (restricted discretionary activity status).	


Proposed Subdivision Rules

	Activity within a Character Area Overlay	Activity if not in a Character Area Overlay
	Minimum net site area for subdivision varies between Character Areas in the Medium Density Zone, but is generally larger than the underlying Zone requirement. In High Density Zone – 400m2.	400m2 proposed for the Medium Density Residential Zone or 300m2 proposed for the High Density Residential Zone

Our proposed Housing and Business Choice Plan Change (14)

[Submitter Details](#)**Submission Date:** 01/05/2023**First name:** Ezzie**Last name:** Smith**Preferred method of contact** Email

Attached Documents

Name
PC14 Desmond St Character Overlay (Proposed) 

PC14 – RESIDENTIAL CHARACTER OVERLAY RULES (PROPOSED)

CCC Summary of Proposed Changes

In recognition of the status of a Qualifying Matter, we propose introducing a resource consent requirement as a restricted discretionary activity, to help us better protect Character Areas. While some infill development will be allowed, we will have more ability to decline a resource consent where the design of a new house, or changes to an existing house, aren't in keeping with the Character Area.

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Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 01/05/2023


First name: Mary

Last name: Clay

Preferred method of contact Postal

Attached Documents

Name

I object to plan change 14 in its entirety for the following reasons 

I object to plan change 14 in its entirety for the following reasons:

- The process by which the community has been consulted with has caused a general lack of understanding within the community. The documentation provided to the general public has contained numerous misleading and incorrect statements, which have resulted in a vast proportion of the community not able to understand the implications of the changes proposed.
- The proposal to increase density in certain parts of the city reflects a misguided and incorrect assumption that there is a need for the level of density proposed, when in fact there is sufficient land zoned for density increase already given the changes already made post earthquake.
- Furthermore, increases in density should be focused on the central city and around key hubs such as Riccarton or Northlands
- The proposed change has failed to take account of the nature of the existing residential environments. The complete failure of the plan change to assess effects on the residents of Christchurch is incomprehensible.
- The poorly conceived application of recession plane concepts has the potential to result in shockingly bad outcomes, and will result in (in many cases), complete loss of sunlight into dwellings and gardens. This will have hugely detrimental impacts on mental health in Christchurch, and will result in the complete loss of the ability of many inhabitants to grow vegetable and fruit gardens in Christchurch's climate.
- The complete lack of proper provision to mitigate against privacy effects is disgraceful.
- The proposal will result in significant loss of tree and garden cover throughout the city
- The proposal reflects a failure to understand how density should be correctly increased across a city
- The exemptions proposed, particularly the high accessibility exemption, is based on unsupported conclusions and presumptions. Furthermore, some of the models used contain presumptions that are inconsistent with conditions that actually exist.
- Much of the plan change documentation appears to be conceived on the incorrect premise that the change is a surety.
- There appears to be a failure to fully understand the implications of the change on the current zoning, and a lack of an assessment of how the proposal will affect existing housing stock
- The incomplete assessment carried out by the Council has resulted in proposed changes that will destroy the very character of Christchurch.
- The changes proposed do not reflect the wishes of the community and the lack of meaningful consultation is entirely undemocratic.
- The proposed changes must be rejected, as they do not reflect the community's need, nor do they properly balance the environmental, economic and social factors as required within the statutory framework.