


Our proposed Heritage Plan Change (PC13)

[Submitter Details](#)**Submission Date:** 23/04/2023**First name:** Kerstin**Last name:** Rupp

Attached Documents

Name	
PC13 and PC14 Submission	

Submission to: Christchurch City Council

Subject: Heritage Plan Change (PC13 & PC14)

By: Kerstin Rupp

Date: 22/04/2023

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

Reasoning:

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

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

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

Our proposed Heritage Plan Change (PC13)


Submitter Details

Submission Date: 30/04/2023

First name: Keith and Helen

Last name: Paterson and Verity


Attached Documents

Name
CCCSubmission-Chester Street East Heritage Plan Change 

Our proposed Heritage Plan Change (PC13)

[Submitter Details](#)**Submission Date:** 30/04/2023**First name:** Keith and Helen**Last name:** Paterson and Verity

Attached Documents

Name
Chester St East Shared Boundary 

SUBMISSION TO: The Christchurch City Council

ON: Heritage Plan Change

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

CONTACT: paterson.verity@xtra.co.nz

1. SUMMARY OF OUR SUBMISSION

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

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

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



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

2. HISTORICAL BACKGROUND

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



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



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

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

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

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

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

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



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

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

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

3. ONGOING DEVELOPMENT

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

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

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

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

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

Date of this submission: 28 April, 2023

SUBMISSION TO: The Christchurch City Council

ON: Draft Heritage Plan Change 13

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

BY: Keith Paterson and Helen Verity

CONTACT: paterson.verity@xtra.co.nz

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

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

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

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

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



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

story of Subdivision and Development:

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

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

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

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

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

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


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

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

Our proposed Heritage Plan Change (PC13)

[Submitter Details](#)**Submission Date:** 01/05/2023**First name:** Melissa**Last name:** Macfarlane

Attached Documents

Name	
Submission on PC13 Uploaded	

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

From: Melissa Macfarlane
 48 Malvern Street
 St Albans
 Christchurch
 Mobile: 027 371 2718

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

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

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

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

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

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 01/05/2023

First name: Sally

Last name: Dixon

On behalf of:

17 Bellvue Avenue, Papanui, Christchurch

Attached Documents

Name
Intensification St James Ave and Windemere Road

- RE: Proposal to build up to multistorey intensive housing on st james Ave and windermere street, papanui
- These multi story buildings will block essential sunlight/light to existing homes
- Less privacy for older houses as 2 to 4 storey buildings will overlook their property
- More noise as more people living in intensive housing
- Roads are busy already and will be a nightmare with large amounts of people living in these apartment blocks
- Parking on the street will be a nightmare with huge increase of people in the area not to mention noise of these cars
- St James Ave is a war memorial street with Anzac March on this street
- Peoples huge investment they have made buying homes will drop and the area will turn into slums
- There is huge amount of new housing around christchurch. New huge subdivisions are all around so there is no shortage of houses. Why pull down perfectly good houses to build these monstrosities.
- Is this just a rate grabbing rote for the council?
- Both streets have character mostly single level homes. Four storey buildings will deter from the history and heritage of this family area

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 28/04/2023

First name: Kate

Last name: Askew

Consultation Document Submissions

Provision: Chapter 9 Natural and Cultural Heritage

Seek Amendment

I seek the following decision from the Council

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

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

My submission is that:

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

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

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

Our proposed Heritage Plan Change (PC13)



Submitter Details

Submission Date: 23/04/2023

First name: Jane and Andrew

Last name: Sutherland-Norton and Norton

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:

Somerfield, Lower Cashmere streets should be suburban character.

My submission is that:

Resource consent should be required before any development can proceed..

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 30/04/2023

First name: Ian

Last name: Shaw

On behalf of: Ian and Karen Shaw

Consultation Document Submissions

Provision: Chapter 1 Introduction

Seek Amendment

I seek the following decision from the Council

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

The area in which changes are sought are:

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

My submission is that:

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

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 30/04/2023

First name: Mark

Last name: Winter

Consultation Document Submissions

Provision: Chapter 10 Designations and Heritage Orders

Oppose

I seek the following decision from the Council

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

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

My submission is that:

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

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

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

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 30/04/2023

First name: Richard

Last name: Abey-Nesbit

Consultation Document Submissions

Provision: Chapter 3 Strategic Directions

Seek Amendment

I seek the following decision from the Council

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

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

My submission is that:

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

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

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

Provision: Chapter 7 Transport

Support

I seek the following decision from the Council

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

My submission is that:

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

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

Provision: Chapter 5 Natural Hazards

Support

I seek the following decision from the Council

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

My submission is that:

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

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 01/05/2023

First name: Robert

Last name: Forsyth

On behalf of: Myself

Consultation Document Submissions

Provision: Chapter 10 Designations and Heritage Orders

Oppose

I seek the following decision from the Council

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

Beverley Street - Heritage removal or amendment to higher zoned density.

Beverley Street to retain its Heritage Zoning.

Traffic Impact Study for safety of residents.

My submission is that:

I strongly oppose as a homeowner on Beverley Street, St Albans, the proposal to remove the heritage zoning classification. There are many original heritage homes on Beverley Street and the newer homes that were built after the earthquake all conformed to an architectural style in keeping with the heritage street requirements. It would be detrimental to the community and residents if the heritage zoning was removed.

There are other practical considerations that the council has failed to take into account in the proposal to remove the heritage restrictions on Beverley Street. Adjoining and parallel streets (Webb Street / Devonport Lane) that are zoned for higher density, multiple townhouse developments have been built and have either minimal or no car parking. There is on Devonport Lane a development of 18 multi-bedroom units under construction with no parking. Beverley Street is a narrow street and from Monday to Friday is already over parking capacity due to proximity to shopping areas. Any removal of the heritage zoning of Beverley Street must be assessed in conjunction with an independent traffic impact report or study. Therefore we request that for any decision to remove the heritage requirements or change the zoning of Beverley Street to higher density the council undertake a traffic impact study to ensure the safety of residents and the impacts of the heritage removal.

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 01/05/2023

First name: John

Last name: Hardie

On behalf of: Trustee of family trust

Consultation Document Submissions

Provision: Chapter 9 Natural and Cultural Heritage

Oppose

I seek the following decision from the Council

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

The JG & JL Hardie Family Trust (the Trust) is the owner of the property at 48 Rata Street, Riccarton, Christchurch. Riccarton bush abuts two sides of the property. The property is rectangular in shape, and one of those sides is obviously much longer and I refer to that as the south side. The other side is shorter in length and is at the back of the property and I refer to this as the west side. In 2010 – 11 the Council promulgated plan change 44 which sought to bring about setback controls on the Trust property relating to those parts which abutted Riccarton Bush. Those controls sort a 10 m setback restricting development on the property, but the 10 m setback was measured from a predator proof fence situated 4 m inside the Bush property. Thus the setback on the Trust property was 6 m. It was opposed by the Trust, and expert evidence was called to say that the controls were not warranted.

Those controls were predicated upon a desire to protect a particularly important tree in the Bush area, that being the kahikatea tree. That is because the roots of that tree extend outwards from the trunk or than other trees. The Trust expert identified existing kahikatea trees inside the bush and gave evidence that none of those trees could be affected by any development on the Trust property. Number close to the boundary of the property. Nevertheless, the hearing Commissioner Mr Lawn asked if the Trust is a compromise would accept the setback on the shorter West side of the property, and the Trust agreed in conjunction with the submitter the Riccarton Bush Trust, on the understanding that there would be no controls on the south side. That was referred to in the decision of the Commissioner and became embedded in the rule which allowed the setback.

The Council has now proposed a completely different basis of determining a setback based on a distance calculated based on the diameter of all trees in the bush. This is opposed. It is unworkable. It appears to apply to all trees are not just the kahikatea tree. It would require all trees in the bush to be measured on a continuing basis because of a change in trunk diameter. The Trust would accept a continuation of the rule that existed in the Plan prior to the introduction of the proposed new rule, and if that is not done by agreement, it opposes all restrictions on the boundary of its property. The Trust is agreeable to acting in good faith to uphold its agreement made during PC 44, despite the fact that it called expert evidence to say that no controls were necessary in relation to its property.

This submission makes no reference to the proposed new rule because it cannot be readily found. It incorporates it by reference to the submission which outlines the nature of the problem and its proposed solution(s)

My submission is that:

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date:	02/05/2023		
First name:	John	Last name:	Hardie
On behalf of:	JG & JL Hardie Family Trust		

Consultation Document Submissions

Provision: Chapter 9 Natural and Cultural Heritage

Oppose

I seek the following decision from the Council

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

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

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

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

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

My submission is that:

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 10/05/2023

First name: Simon and Judith

Last name: Adamson and Hudson

Consultation Document Submissions

Provision:

Not Stated

I seek the following decision from the Council

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

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

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

My submission is that:

Amendment requested as below (see attachment)

SUBMISSION TO: The Christchurch City Council

ON: Draft Heritage Plan Change

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

CONTACT: simonmobile1@gmail.com
Judemobile1@gmail.com

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

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

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

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

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

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

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

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

Yours sincerely,

Dr Simon Adamson

Ms Judith Hudson

April, 2023

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 10/05/2023

First name: Susan

Last name: Parle

Consultation Document Submissions

Provision:

Not Stated

I seek the following decision from the Council

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

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

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

My submission is that:

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

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 10/05/2023

First name: Mary

Last name: Crowe

Consultation Document Submissions

Provision:

Not Stated

I seek the following decision from the Council

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

Provision: Heritage protection designation

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

My submission is that:

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

Our proposed Heritage Plan Change (PC13)

Submitter Details

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

Community Board

On behalf of:

Postal address: 35 Langdons Road

Suburb: Papanui

City: Christchurch

Country: New Zealand

Postcode: 8053

Email:

WaipapaCommunityBoard@ccc.govt.nz

Daytime Phone: 027 404 3093

Gain an advantage in trade competition through this submission

I am not

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

a. adversely affects the environment, and

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

Note to person making submission:

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

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

☒ Yes

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

Additional requirements for hearing:

Consultation Document Submissions

- ☐ Support
☐ Oppose
☐ Seek Amendment

I seek the following decision from the Council

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

Provision: Residential Heritage Areas

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

My submission is that

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

Attached Documents

File
No records to display.

17 April 2023

Christchurch City Council

By online submission to 'Have your say' page

Papanui Service Centre
5 Restell Street
Christchurch 8013

PO Box 73024
Christchurch 8154

ccc.govt.nz

Tēnā koe,

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

1. Introduction

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

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

2. Submission

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

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

Nāku noa, nā



Emma Norrish
 Chairperson
 Waipapa Papanui-Innes-Central Community Board

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 10/05/2023

First name: Jayne

Last name: Smith

Consultation Document Submissions

Provision:

Not Stated

I seek the following decision from the Council

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

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

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

My submission is that:

I support the changes as I do believe we need to remember our past, so we can be in the present and learn for the future. However, when we purchased our home there were not indications that this would occur to a residential area that would place potential limitations or possibly more challenges onto the owners, which will come at the owners cost. I am also concerned about the lack of clarity on examples of what qualifying matters would be considered and what rules would then be applied. my reason for my view is that it is deemed unreasonable that as a rate payer in Ōtautahi I would be excluded or be in a special group when it comes to making improvements that enhance sustainability which will change the look of the house ie solar panels, water capture tanks. It is unreasonable that this could come at an extra cost for us due to the caveats that are part of the RHA expectations. Such as the look from the road can not change. When in fact changes have already occurred throughout the neighbourhood. The other aspect is, depending on the view from the road some home owners maybe able to make certain changes but others would be unable to due to breaking this rule. An example would be someone living on the corner and has two sides that are viewed from the road. Lastly, when a building has been made of heritage value there is already an understanding and this can often add value to the building because it is now viewed differently, and potential buyers will often buy knowing this. We have not had this opportunity the decision has been made and applied, yes there are some benefits but when selling our homes those benefits could also work against us which could diminish the value of our properties. As the potential for development has been removed for example a home on the back, upgrading to more sustainable living.

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 10/05/2023

First name: Keunah

Last name: Kim

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: 'Increases in building heights enabled in most suburban commercial centres ranging from 12 m in the smallest neighbourhood and local centres to 22 m in larger town centre zones. Precincts around these centres will also enable increased building heights for housing 14-32m'

Decision Sought: Current rules re recession planes should be preserved - 45 degrees on neighbours east side and 55 degrees on neighbours west side.

My submission is that:

I strongly oppose this plan. The majority of Christchurch is built on relatively flat land and in certain suburbs are packed tightly together. This proposed plan to increase building heights will certainly impact sunlight in homes, even more so in winter. Having a building of 14-32 metres built within metres of a property boundary will no doubt impact privacy, sunlight, ventilation of numerous properties. Christchurch is different from the rest of the country as it is built predominately on flat land and hence this rule affects owners disproportionately. If a high rise were to be built it should have to go through consent process.

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 10/05/2023

First name: Julie

Last name: Florkowski

Consultation Document Submissions

Provision:

Not Stated

I seek the following decision from the Council

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

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

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

My submission is that:

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

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 10/05/2023

First name: Chris

Last name: Florkowski

Consultation Document Submissions

Provision:

Not Stated

I seek the following decision from the Council

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

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

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

My submission is that:

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

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 10/05/2023

First name: Matty

Last name: Lovell

Consultation Document Submissions

Provision:

Not Stated

I seek the following decision from the Council

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

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

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

My submission is that:

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

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 10/05/2023

First name: Bosco

Last name: Peters

Consultation Document Submissions

Provision:

Not Stated

I seek the following decision from the Council

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

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

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

My submission is that:

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

SUBMISSION TO: The Christchurch City Council

ON: Heritage Plan Change

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

CONTACT: boscopeters@gmail.com
helenpchch@gmail.com

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

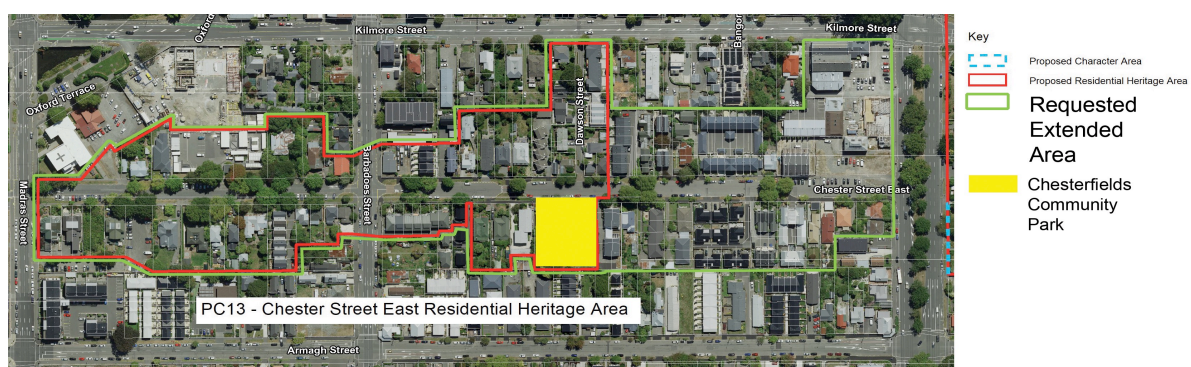
*The footsteps laid down by those who went before us
 create the paving stones upon which we stand today.*

1. SUMMARY OF OUR SUBMISSION

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

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

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



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

2. HISTORICAL BACKGROUND

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



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



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

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

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

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

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

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



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

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

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

3. ONGOING DEVELOPMENT

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

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

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

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

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

Date of this submission: 12 April, 2023

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 10/05/2023

First name: Cyril Warren

Last name: Price

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: Christchurch District Plan Proposed Plan Change 14 - Housing and Business Choice and Proposed Plan Change 13- Heritage

Decision Sought: Paparoa Street, Papanui, Christchurch become part of a Residential Suburban Zone restricted to urban residential living.

My submission is that:

Christchurch is seeking to present itself as a city and destination of choice. Paparoa Street is a pleasant, tree lined street typical of those designed to support the Christchurch image of "the Garden City" and the worst possible thing the city can do is to open itself up to the possibility of a multitude of medium and/or high density residential areas throughout the city. Yes, there is a place for everything but it should be a very restricted place and not spread randomly at the will of developers. Having lived overseas for sometime I have seen the dangerous environments that can be created by these types of developments and they should be very tightly controlled in very restricted areas. Paparoa Street, Papanui is a street midway between the commercial developments of Merivale Mall and Northlands and is a long way from being an easy practical walking distance from these shops. It also has a popular school at its end which creates a nightmare parking scenario at opening and closing times. Multi storey buildings would only make these situations worse.

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 10/05/2023

First name: Kristin

Last name: Mokes

Consultation Document Submissions

Provision:

Not Stated

I seek the following decision from the Council

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

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

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

My submission is that:

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

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 10/05/2023

First name: Maxine

Last name: Webb

Consultation Document Submissions

Provision:

Not Stated

I seek the following decision from the Council

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

Provision: Heritage plan change P C 13

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

My submission is that:

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

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 10/05/2023

First name: Daniel John

Last name: Rutherford

Consultation Document Submissions

Provision:

Not Stated

I seek the following decision from the Council

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

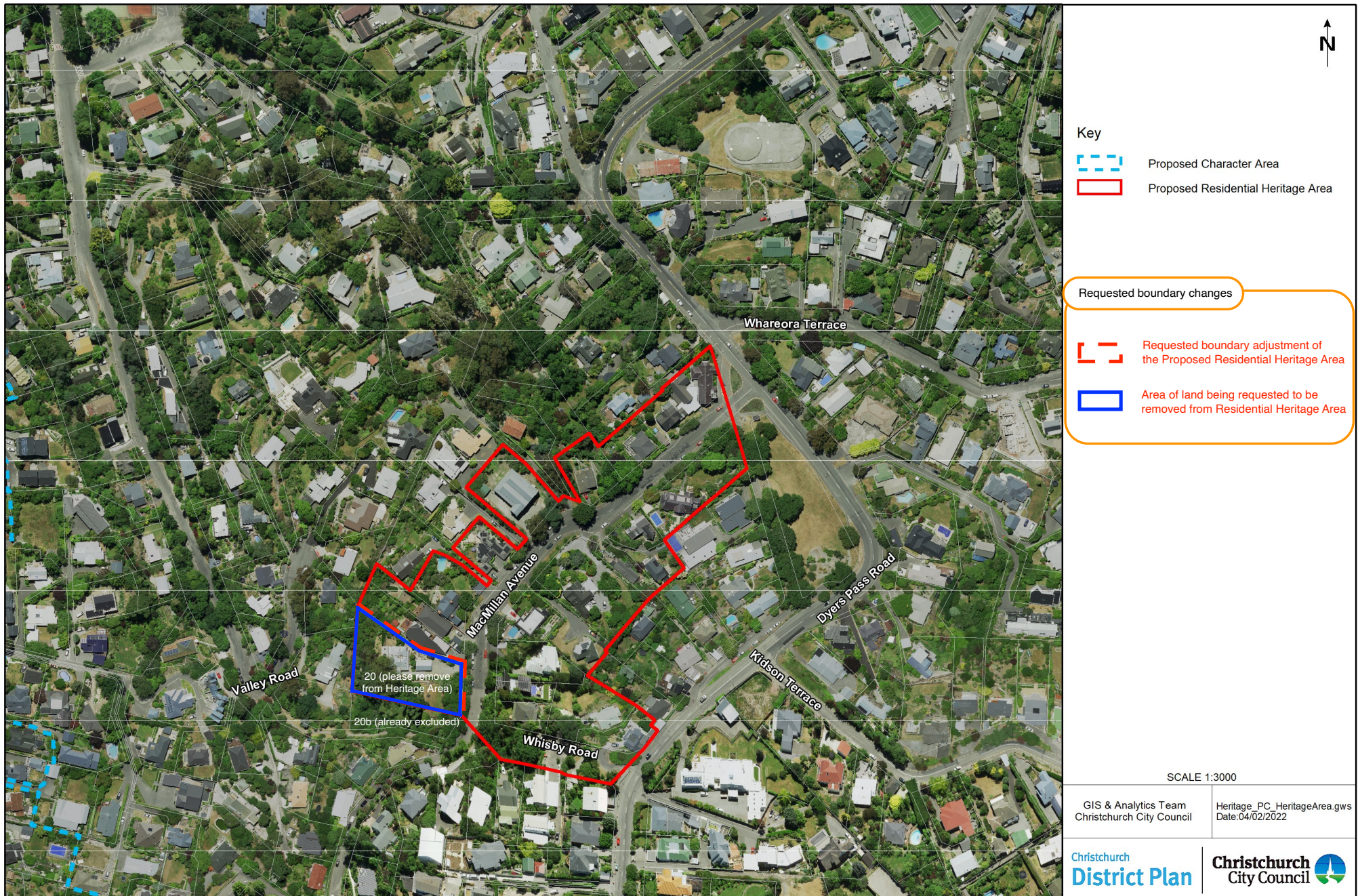
Provision:N/A

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

My submission is that:

Please remove our property from the MacMillan Ave Residential Heritage Area, for the following reasons; 1. HERITAGE VALUES Our home at 20 Macmillan Ave no longer meets the heritage area criteria because it no longer embodies the heritage values of the area. 2. TECHNOLOGICAL AND CRAFTSMANSHIP SIGNIFICANCE Due to earthquake damage, our home needed substantial repair work and it has subsequently lost any heritage value it might have had. We were fortunate to have the support of the council during these repairs (and all work was consented). During the post-earthquake repairs and renovations, all of the fireplaces were removed, walls were removed, remaining walls were gibbed, new windows and doors were put in, a modern kitchen, office and ensuite bathrooms were installed, and so on. The house is now a modern-style, open-plan home. It no longer has technological and craftsmanship significance. 3. ARCHITECTURAL AND AESTHETIC SIGNIFICANCE The house at 20 MacMillan Ave was not designed by an architect or significant designer in the first place, and subsequent work done on the building means that it no longer has any architectural or aesthetic significance. 4. CONTEXTUAL SIGNIFICANCE The house is no longer visible from the road, so has no heritage value to the public, including contextual significance. a. There are plantings along the MacMillan Ave boundary screening all buildings from view from the roadside. b. A large 'versatile' garage (consented) has been built between the road and the house, providing a second layer of screening, to hide the the house from view (please note that the photo of our property on the record form is outdated). c. The property is located at the end of a right-of-way. The screening of the buildings, and location down a long driveway, make it more similar to a rear site than a front site. 5. EXCLUSION OF THE GARDEN The record form refers to the 'large, well planted garden' being the main reason for its 'defining' rating. a. Most of the garden is outside the proposed heritage area (on the second title of our property, 20b Macmillan Ave). b That area of garden is largely undeveloped, and looks pretty rough. We want it to remain excluded from the RHA, so we can beautify or develop it with ease, if we choose to in the future. c. On the included title (at 20 MacMillan Ave) the original old world garden has been removed and replaced with an asphalt storage area and easy-care modern decking across most of the site around the house. d. A large area of garden along the north boundary was removed when that area of land was excavated for the (consented) large retaining wall supporting the neighbours' house at 18 Macmillan ave. e. Most of the remaining land on that site is now asphalt driveway. 6. CULTURAL AND SPIRITUAL SIGNIFICANCE The property has never had any historically significant owners, so it has no cultural or spiritual significance. There have essentially been three families of owners of the property since it was constructed; a. the owners referred to in the record form (the Shaws) were a salesman and a home economics teacher. b. the next owners (the Bates) had a small shop, c. we are landscapers. None of those owners was historically significant. 1st CONCLUSION; Our home has not retained a level of authenticity and integrity sufficient to demonstrate the values of the defining buildings, structures and other features that establish the historic heritage values of the Residential Heritage Area. RHA BOUNDARY Our property is in two titles, located on the southwest edge of the proposed Residential Heritage Area. Part of our property (20) is in the proposed RHA and part of it (20b) is out of the proposed RHA. The proposed boundary of the RHA would split our property down the middle. We are requesting that the boundary of the proposed RHA is adjusted to exclude 20 Macmillan ave, so all of our property is kept together, outside the proposed heritage area. THE CONSEQUENCES OF SPLITTING UP OUR PROPERTY We've lived in this home for 30 years, brought up a family here and plan to retire here. Our son who is a builder hopes to build a home for his family on the second title in the future, so he can bring up his own family next to us in Cashmere. This is really the only way he and his family would be able to have their own home and would ensure we have care nearby. If this plan were to go ahead we may need to adjust the boundary between the two titles to a more practical location. Should the Heritage area goes ahead as planned, we would have a major heritage boundary running between our

two titles, which would make it very difficult for us to adjust the boundary between the two titles. Consequently, this would make us staying in our beloved family home with a very large garden in our old age very difficult. 2nd CONCLUSION We consider it is unreasonable for the council to impose an RHA boundary through the middle of our property, splitting our home through the middle of the two titles that it's comprised of. We request the council exclude both properties from the Heritage zone.



PC13 - MacMillan Avenue Residential Heritage Area

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 10/05/2023

First name: Rob

Last name: Seddon-Smith

Consultation Document Submissions

Provision:

Not Stated

I seek the following decision from the Council

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

Provision:General commentary

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

My submission is that:

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

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 10/05/2023

First name: Tom

Last name: Reece

Consultation Document Submissions

Provision:

Not Stated

I seek the following decision from the Council

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

Provision: Restoration of historic / heritage buildings.

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

My submission is that:

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

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 10/05/2023

First name: Paul

Last name: Mollard

Consultation Document Submissions

Provision:

Not Stated

I seek the following decision from the Council

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

Provision: The geographic boundaries of the heritage areas

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

My submission is that:

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

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 10/05/2023

First name: Jeanne

Last name: Cooper

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: Plan change 13 and 14ii

Decision Sought: A buffer zone of building regulations where character areas meet RMD intensive housing and new height regulations.

My submission is that:

My property is in and on the border of an existing character area. It is also close to Merivale shopping and Papanui bus route. I am concerned that building height changes mean that a high building can border my northern property boundary and block sunlight from my house. My street is already undergoing intensive housing changes with 26 dwellings replacing 2. All trees are going or gone and soft surface is replaced by hard. No parking provision for 18 of the 26 new proposed or underway building. So the existing character area is bordered by intensive housing. Surely there should be a buffer between character and intensive areas with according building regulations. I am also concerned that 24 more properties with no soft surface to absorb rain water will adversely affect the drainage system which to my 40 residency has not been upgraded apart from adding new drainage pipes to the extra housing. Similarly power supply has simply been adjusted to eliminate several poles and add wiring to the existing poles left. I don't think this is clever city planning and can see future problems.

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 10/05/2023

First name: Janice

Last name: Grant

Consultation Document Submissions

Provision:

Not Stated

I seek the following decision from the Council

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

Provision: The whole thing is ruining the city

Decision Sought: I think high rise should be restricted to the areas between Brougham, Ensors Rd, Linwood Ave Stanmore Road across through St. albans as its ruined already and the Riccarton area as it has this already. 2 level buildings is enough.

My submission is that:

I do not support the changes. Who wants an apartment block beside them or heaps of cars on the street. In my area Opawa is starting to be ruined. There is a 17 apartment block on the corner of Opawa Rd and Ensors. There will be chaos round that round about cars everywhere, there is not enough onsite parking. There is now speed restrictions but no one takes notice buses included. The cycle lanes are a joke as cars round that particular development park all over the cycle lanes as they are close to the curb and there is no yellow lines there. The council doesn't have the city transport infrastructure to encourage people to use it and not use cars. The whole government has dropped the ball has built huge motorways not rail systems so short sighted relating to climate change.

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 10/05/2023

First name: Sam

Last name: Spekrijse

Consultation Document Submissions

Provision:

Not Stated

I seek the following decision from the Council

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

Provision: PC13, all Heritage Area provisions.

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

My submission is that:

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

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 10/05/2023

First name: Ebin

Last name: Scaria Jose

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: plan change 14 - areas limited by qualifying matters Natural Hazard

Decision Sought: I would like to have my section reviewed and remove qualifying matters - Tsunami Management area from my section. As it will prevent from developing the section.

My submission is that:

My 612m² section comes under MRZ and tsunami Management area. I support the proposal of MRZ however, I strongly oppose proposal of including part of my section to tsunami management area. My section is already raised from the street when compared to the section opposite to mine. However tsunami management area is not covered in the opposite section but part of my section is!. By dividing my section to tsunami management area and MRZ, I won't be able to develop the section. I would like to have my section reviewed in regards to qualifying matters - Tsunami Management area

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 10/05/2023

First name: Ben

Last name: Hay-Smith

Consultation Document Submissions

Provision:

Not Stated

I seek the following decision from the Council

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

Provision: Proposed Heritage Plan Change PC13 (all provision)

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

My submission is that:

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

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 10/05/2023

First name: Emily

Last name: Arthur

Consultation Document Submissions

Provision:

Not Stated

I seek the following decision from the Council

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

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

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

My submission is that:

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

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 10/05/2023

First name: justin

Last name: avi

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:remove antonio hall from the heritage list. its not heritage, is an eyesore

Decision Sought:remove antonio hall from the heritage list. its not heritage, is an eyesore

My submission is that:

remove antonio hall from the heritage list. its not heritage, is an eyesore

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 10/05/2023

First name: Peter

Last name: Earl

Consultation Document Submissions

Provision:

Not Stated

I seek the following decision from the Council

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

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

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

My submission is that:

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

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 01/05/2023

First name: Geoff

Last name: Mahan

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:

My submission is that:

I am greatly concerned the plan is empowering developers who in general are only concerned about their profit margins. This will lead to a reduction in green spaces around homes as we encourage overcrowding with in our suburban areas. Without regulation we will create a boring over crowded homogenization of apartments with very little relief to the eye or soul. already walks through the St Albans area are becoming disturbing with the seemingly uncontrolled development as we race to tear down our suburban history. I remember when Christchurch/ Otautahi was considered the most English city outside of England also it was known as the Garden city [we lost the first moniker even before the earthquakes are we to now lose the second moniker?]

Or can we encourage sympathetic development where we have a mix of the apartment complexes or silos amongst more traditional homes but build these apartments in the older areas of CHCH using more traditional and sympathetic building materials .

Maybe we should have medium and high density pockets of development within all suburbs instead of classifying a whole suburb as medium and high density. This would create greater suburban charm and less uncertainty for homeowners yes we live in fear that living in the bottom of a canyon where we may not see the sun again in our living areas or can look out onto a tree - not good for the soul and mental health. I do remember reading how patients in a hospital have better health outcomes if they can see some aspect of nature -this applies to individuals making up a community. Developers usually have no interest in citizens mental health that is one of the reasons we have councils.

Also with the proliferation of apartments and the associated loss of soft surfaces has consideration been given to storm water runoff and its impacts on flooding going forward on low lying ChCh and that much of Christchurch was built on swampy land.

Why Destroy our historical areas [Probably good for tourism? the future may thank us too] and not develop some of the 1950to 1980's suburbs and put in better public transport.

I feel that 3 stories is too high in already current settled areas, but in new developments if they had more space around them it would be more appropriate.

In conclusion - yes we need to increase city density levels and we need to protect our good farming soils which historically and ignorantly were built over with single story housing which amplifies the shame of very poor past planning in which developers had too much say. All suburbs from all eras need to do their bit - do not saddle the older suburbs close to the city with a disproportionate burden we are being unfairly singled out! We are the charm that is ChCh.

What will we loose if we do not have better regulation and regulators.

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 02/05/2023

First name: Neil

Last name: McNulty

On behalf of: 29 Forbes Street

Consultation Document Submissions

Provision: Chapter 10 Designations and Heritage Orders

Oppose

I seek the following decision from the Council

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

I ask that the council do not make Forbes Street a RHA due to the above factors. There is in fact little genuine heritage fabric left in this street due to the nature of the current buildings, a lot which have been bastardized over the years and are in process of slow decay. A lot of good aesthetic development has happened in Sydenham over the last couple of years, Forbes St would be a better street aesthetically and socially if there was no restrictions placed on it in the form of a RHA.

My submission is that:

My partner and I have lived at 29 Forbes Street for the last 34 years. It is an Edwardian Villa which has been totally renovated, in part due to the earthquakes. The council is proposing to turn Forbes Street into a RHA as it is considered a turn of the century (20th) due to it being an example of working class area. Most of the heritage buildings are in various state of repair/disrepair, consequently the buildings on this street do have a limited shelf life. The owners of some of these buildings do not intend to or have the economic ability to repair and maintain these buildings in an optimal and original condition. In the current climate crisis (as recently seen with recent cyclone) Sydenham and this street in particular is ripe for redevelopment which is in keeping with the Govt housing strategy of intensification. Sydenham is suited to this being close to the CBD with good public transport, easy walking, cycling and e bikes/scooters along with good access to green spaces and other amenities.

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 02/05/2023
First name: Ruth **Last name:** Morrison
On behalf of: Morrison Family

Consultation Document Submissions

Provision: Chapter 9 Natural and Cultural Heritage

Seek Amendment

I seek the following decision from the Council

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

Keep the area around Paparoa St, Dormer St, Rayburn Ave and Perry St as heritage areas, as per the decision in 2016. The area is a long established War Memorial area with beautiful trees and an important history. How about making sure all areas identified in 2016 as heritage automatically stay that way now? And others added as needed? Stop making residents go over the same ground again and again trying to keep the 'Garden City' at least a bit beautiful - life is busy and a council should be sensible enough to save a city's heritage on it's own. Our family of 7 all want our heritage area kept.

My submission is that:

Keep the area around Paparoa St, Dormer St, Rayburn Ave and Perry St as heritage areas, as per the decision in 2016. The area is a long established War Memorial area with beautiful trees and an important history. How about making sure all areas identified in 2016 as heritage automatically stay that way now? And others added as needed? Stop making residents go over the same ground again and again trying to keep the 'Garden City' at least a bit beautiful - life is busy and a council should be sensible enough to save a city's heritage on it's own. Our family of 7 all want our heritage area kept.

Provision: Chapter 10 Designations and Heritage Orders

Seek Amendment

I seek the following decision from the Council

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

Keep the area around Paparoa St, Dormer St, Rayburn Ave and Perry St as heritage areas, as per the decision in 2016. The area is a long established War Memorial area with beautiful trees and an important history. How about making sure all areas identified in 2016 as heritage automatically stay that way now? And others added as needed? Stop making residents go over the same ground again and again trying to keep the 'Garden City' at least a bit beautiful - life is busy and a council should be sensible enough to save a city's heritage on it's own. Our family of 7 all want our heritage area kept.

My submission is that:

Keep the area around Paparoa St, Dormer St, Rayburn Ave and Perry St as heritage areas, as per the decision in 2016. The area is a long established War Memorial area with beautiful trees and an important history. How about making sure all areas identified in 2016 as heritage automatically stay that way now? And others added as needed? Stop making residents go over the same ground again and again trying to keep the 'Garden City' at least a bit beautiful - life is busy and a council should be sensible enough to save a city's heritage on it's own. Our family of 7 all want our heritage area kept.

Our proposed Heritage Plan Change (PC13)



Submitter Details

Submission Date: 02/05/2023

First name: Mark

Last name: Enfield

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:

I support HRZ in Bampton St

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 02/05/2023

First name: Cameron

Last name: Parsonson

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:

Agreement to remove 471 Ferry Road from the Schedule of Designated Heritage Buildings.

My submission is that:

I make application to remove 471 ferry road from the schedule of designated heritage buildings for the following reasons:

Original method of construction means that it is not possible to economically disassemble and rebuild the structure.

Engineering a rebuild of this stacked rubble-stone building would be expensive and require near full disassembly of the structure in order to rebuild it, putting it beyond feasibility.

There is little community interest in the asset being restored. Its construction material is its most novel endearing feature, but if restored would offer little economic or commercial interest to the owner or the community.

Any rebuild would likely require significant local government heritage grants if it was to be pursued.

The building is landlocked; access is via an easement over another property from the rear and new traffic islands and the pedestrian crossing configuration mean that it's Ferry road frontage is unusable.

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 02/05/2023

First name: Paul and Linda

Last name: Scott

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:

PLAN CHANGE 13 - HERITAGE

1. I fully support Plan Change 13 but with Amendments.
2. PC 13 must be extended in the scope not to allow High Density Residential Buildings on the residential properties behind these protected trees. What an insult this would be to our Fallen Soldiers and current Service people. The trees and plaques are one point of note but to destroy the street-scape behind the trees is an absolute disgrace by those who are trying to make this part of the change. Buildings three or six storeys high have no place on a Memorial Avenue like St James Avenue. What a disgraceful suggestion by those in power.

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:

PLAN CHANGE 14 - INTENSIFICATION

1. I do not support Plan change 14 at all in Heritage Areas.
2. A tree-lined street (Memorial Heritage Area) is no place for Residential Intensification. It should be noted that the subject of Intensification in St James Avenue was previously dealt with at a Hearing chaired by Sir John Hansen which was held in Christchurch on the 4th & 5th July 2016 to rule on St James Avenue Residents'

objections to proposed Intensification. The Decision released on 6th September 2016 found in favour of the Residents by rejecting Intensification in St James Avenue. It is appalling that this Decision has now been ridden roughshod over by the rezoning of St James Avenue into a High Density Residential area. This debate should not even be taking place.

3. Part of St James Avenue's footpaths and roadway have been upgraded. The rest of the Street is to an older style and will most likely be upgraded at some stage in the future. It doesn't matter whether it's old or new, however, because cars, vans, trucks and service vehicles do park on the grass berms and - at times - over the tree roots. This will eventually damage the roots of the trees. Intensification of St James Avenue will only make this worse.

4. How are the Fire Brigade going to fight a fire in six-storey buildings with a water-jet snorkel arm if trees are in the way? How might people be rescued from these multi-storey residences by the Fire Brigade with a hydraulic ladder mounted to a fire engine? Sprinkler systems are expensive to install and maintain and they do not cover every eventuality.

5. The Storm Water system in St James Avenue barely copes now. Parts of the street always flood. Intensification will create more roofing areas and more concrete / asphalt areas so there will be more rain water going into the storm water system because of less natural seepage into the garden and lawn areas - because these garden and lawn areas will simply not be there.

6. In the process of intensifying this area there would be a very large number of trucks, transporters, excavators and builders, drainlayers and electricians vehicle movements amongst the protected trees allowing for further damage to the roots to occur. Do not say this can be managed - this does not happen in reality; damage will occur. I saw it happening and when Earthquake repairs were being undertaken in this street.

7. St James Avenue is not wide enough in road and footpath width to handle this proposed type of Intensification. Do not say it is, because you do not live here. I have lived in this street for 53 years. There would not be enough parking space available at night for the number of residents' vehicles involved in these new high-rise developments. It's high time that those who support these developments woke up and accepted that a lot of the people who will be living in these high-rises will still own vehicles. People currently park on the grass berms anyway when parking becomes tight outside where they live, potentially causing further tree-root damage. This will only get worse. The street would struggle with the increased traffic volumes because of its narrow width. There are many unreported bumps and scrapes to vehicles happening in this street already. It is quite common for side rear-vision mirrors to be damaged on parked vehicles by passing traffic.

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 03/05/2023

First name: Ross

Last name: Boswell

Consultation Document Submissions

Provision: Chapter 9 Natural and Cultural Heritage

Seek Amendment

I seek the following decision from the Council

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

Add the memorial in Jane Deans Close to the list of recognised heritage sites.

My submission is that:

The 20th Battalion and 20th Regiment memorial in Jane Deans Close should be recognised as a heritage site. An annual anzac Day service is held at this site.

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 03/05/2023

First name: Anna

Last name: McKenzie

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 all INTENT to allow building WITHOUT CONSENT up to 12m high in ALL SUBURBS
especially HILL SUBURBS.

KEEP existing height restrictions in place - DO NOT MEDDLE WITH THEM.

My submission is that:

I STRONGLY OPPOSE

BUILDING WITHOUT CONSENT UP TO 12m high and only 1m from boundaries in the SUBURBS.

WHAT A CRAZY idea.

NOBODY wants a 12m high monstrosity next door - and only 1m from the fence.

RATEPAYERS are entitled to an expectation that the council will protect their SUNLIGHT, PRIVACY, SENSE OF SPACE and VIEWS.

THIS is particualury essential for HILL SUBURBS where people live FOR THE VIEW and where VIEWS form a valuable component in the desirability and value of their home.

It is COMPLETELY crazy to allow buildings up to 12m high with a consent

WITHOUT a consent is just completely stupid.

Home owners will be put in the horrible and expensive situation of having to GO TO COURT to STOP ugly

MONSTROSITIES being built next door.

This is REALLY UNFAIR. Most people don't have that kind of money, and many people are just trying to deal with the cost of living and don't need that stress on top of everything else.

PROTECT our rights to space, views, privacy, sunlight and aesthetics.

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 ALL INTENT TO ALLOW BUILDING UP TO 12m high with and WITHOUT CONSENT.

KEEP EXISTING HEIGHT RESTRICTIONS IN THE SUBURBS, especially HILL SUBURBS.

My submission is that:

IT is DEEPLY CONCERNING THAT the CCC proposes building WITHOUT CONSENT up to 12m high and only 1m from boundaries in suburban areas.

NOBODY wants a 12m high MONSTROSITY built next door that blocks SUNLIGHT, PRIVACY, SPACE, AESTHETICS and VIEWS.

This is especially important for HILL SUBURBS.

PEOPLE LIVE ON HILLS FOR THE VIEWS, they are heavily invested in their properties for the unique outlooks in hill suburbs, and that is what forms an important component of their property's appeal and value.

RATPAYERS are entitled to an expectation that the council will PROTECT THEIR RIGHTS to SUNLIGHT, SPACE, PRIVACY, AESTHETICS and VIEWS and will NOT COMPROMISE the value of their homes.

If 12m high monstrosities start going up next door, the only avenue people will have is to take legal action: MOST PEOPLE do not have the TIME or the MONEY to go through long, stressful legal proceedings.

WE need to STOP this lunacy now, and protect the value of our homes, and STOP Christchurch becoming an ugly, shambolic, dark, cold, horrible place to live.

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 04/05/2023

First name: Cameron

Last name: Matthews

Consultation Document Submissions

Provision: Chapter 2 Abbreviations and Definitions

Seek Amendment

I seek the following decision from the Council

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

Remove all Residential Heritage Areas from the plan.

Strike out all rules or parts of rules as they relate to RHA's and Heritage Areas, including (but not limited to):

- Contributory and Defining Buildings
- Relocation

My submission is that:

I oppose the proposed Residential Heritage Areas. I think they shouldn't be Qualifying Matters and should all be removed from the plan.

Provision: Chapter 8 Subdivision, Development and Earthworks

Seek Amendment

I seek the following decision from the Council

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

Remove all Residential Heritage Areas from the plan.

Strike out all rules or parts of rules as they relate to RHA's and Heritage Areas, including (but not limited to):

- 8.6.1

My submission is that:

I oppose the proposed Residential Heritage Areas. I think they shouldn't be Qualifying Matters and should all be removed from the plan.

Provision: Chapter 6 General Rules and Procedures

Seek Amendment

I seek the following decision from the Council

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

Remove all Residential Heritage Areas from the plan.

Strike out all rules or parts of rules as they relate to RHA's and Heritage Areas, including (but not limited to):

- 6.8.5.1(a)(iv)

My submission is that:

I oppose the proposed Residential Heritage Areas. I think they shouldn't be Qualifying Matters and should all be removed from the plan.

Provision: Chapter 9 Natural and Cultural Heritage

Seek Amendment

I seek the following decision from the Council

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

Remove all Residential Heritage Areas from the plan.

Strike out all rules or parts of rules as they relate to RHA's and Heritage Areas, including (but not limited to):

- 9.3.2.2.2
- 9.3.4.1

My submission is that:

I oppose the proposed Residential Heritage Areas. I think they shouldn't be Qualifying Matters and should all be removed from the plan.

Provision: Chapter 14 Residential

Seek Amendment

I seek the following decision from the Council

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

Remove all Residential Heritage Areas from the plan.

Strike out all rules or parts of rules as they relate to RHA's and Heritage Areas, including (but not limited to):

- 14.5.3.1.3
- 14.5.3.2
- 14.6.1.3 Advice Note: 1, and any other provision enacting a low-density buffer-zone between HRZ and RH zones.

My submission is that:

I oppose the proposed Residential Heritage Areas. I think they shouldn't be Qualifying Matters and should all be removed from the plan.

Provision: Planning Maps

Seek Amendment

I seek the following decision from the Council

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

Remove all Residential Heritage Areas from the plan, particularly:

- Lyttelton
- Piko/Shand
- Inner City West

My submission is that:

I oppose the proposed Residential Heritage Areas. I think they shouldn't be Qualifying Matters and should all be removed from the plan. In particular I oppose the following proposed Residential Heritage Areas:

- Lyttelton - Heritage restrictions cover most of the town, and enforcing arbitrary design standards and density restrictions on an otherwise organic urban character, appreciated for its authenticity to the diverse makeup people living there and the interesting juxtaposition of natural landscapes, active heavy industry, artistic expression, and good hospitality venues. The proposed restriction will limit Lyttelton's authentic, vibrant character by constraining the aesthetics of built structures to some fixed period, which will develop inauthentically to the needs and preferences of the current and future residents, while worsening housing affordability - exacerbating gentrification.
 - Piko/Shand - Heritage restrictions here would retain low-density ex-state-houses in favour of high-quality, high density homes abutting the proposed mass-rapid-transit line linking Hornby and Riccarton commercial centres to the City Centre and beyond. This is also proximal to the University of Canterbury. This is an area perfectly suited to more homes.
 - Inner City West - Heritage restrictions here would apply to many buildings of low quality, low significance, and in an extremely central and desirable location, walkable to the City Centre, Botanic Gardens, Arts Centre, City Council building, etc. The relevant heritage structures nearby are already protected by individual designations. This is an ideal place for more new structures, not less.
-

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 05/05/2023

First name: Dylan

Last name: Lange

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:

Low Public Transport Accessibility Area Qualifying Matter

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.

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:

My submission is that:

Tree Canopy Cover and Financial Contributions.

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.

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:

Low Public Transport Accessibility Area Qualifying Matter

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.

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:

High-Density Residential Zone

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.

Attached Documents

Name	
Dylan Lange-email	

Cui, Aviva

From: Generation Zero <noreply@123formbuilder.com>
Sent: Tuesday, 2 May 2023 1:29 pm
To: Engagement
Subject: CCC District Plan Changes (PC14) - Generation Zero Quick Submit / 531

This is a submission on the proposed Christchurch District Plan changes via the Generation Zero quick submission form. The feedback below is on PC14.

Form Summary

1. First / Last name	Dylan Lange
2. Email address	dylanjlange@gmail.com
3. Postal Address	23 Stanton Crescent Hillmorton Christchurch 8025
4. Trade competition/adverse effects:	Option 1: I could not gain in trade competition through this submission
5. Answer if you selected option 2 above:	Are you directly affected by a possible effect of this plan change in a way that it: a. adversely affects the environment, and b. does not relate to the trade competition or the effects of trade competitions Option 2: No
Chapter 6 - Tree Canopy Cover and Financial Contributions	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

Form Summary

environmental, health, social and economic benefits and are important for the future of our city.

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.

Chapter 14 - Low Public Transport Accessibility Area Qualifying Matter

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.

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.

Chapter 14 - Sunlight Access Qualifying Matter

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.

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.

Chapter 14 - High-Density Residential Zone

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.

Form Summary

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.

Any other comments?

The message has been sent from 118.148.83.71 nz at 2023-05-02 on Chrome 112.0.5615.135

Entry ID: 64

Referrer: <https://www.generationzero.org/>

Form Host: <https://form.123formbuilder.com/6423130/ccc-district-plan-changes-pc14-generation-zero>

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date:	05/05/2023		
First name:	Defyd	Last name:	Williams
Organisation:	Papanui Heritage Group		
On behalf of:	Papanui Heritage Group		

Consultation Document Submissions

Provision: Chapter 1 Introduction

Seek Amendment

I seek the following decision from the Council

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

he change we are seeking is to have the Memorial Avenues (St James Avenue, Dormer, Perry and Gambia Streets) removed from the High Density Residential Zone (HRZ). In addition we ask that part of three memorial avenues (Halton Street, Tomes Road, and one side of Windermere Road) plus some other streets adjoining the memorial avenues, also be removed from the HRZ zone.



My submission is that:

See the attachment for the full submission.

Our submission is regarding Proposed Plan Change 13 – Heritage: the addition of Papanui's 16 Memorial Avenues as Heritage Items, (Heritage Item 1459) as shown on Planning Map 24.

The Papanui Heritage Group **supports** the addition of the sixteen (we believe fifteen Papanui Memorial Avenues, plus Tillman Avenue), to the District Plan's Schedule of Significant Historic Heritage for protection. We understand the addition of the memorial trees to the schedule is also a Qualifying Matter under Plan Change 14 and we have prepared a separate submission on PC 14.

Attached Documents

Name
Defyd Williams-PHG submission PC 13 Heritage 
Defyd Williams Email 

Cui, Aviva

From: defydjoan@xtra.co.nz
Sent: Thursday, 4 May 2023 5:14 pm
To: Engagement
Subject: Papanui Heritage Group submissions for PC13 and PC 14
Attachments: 2 PHG submission PC 13 Heritage.docx; PHG submission PC 13 Heritage.docx

Dear Swantje

submissions on PC13 and PC14 are attached? I would like to speak to the two submissions. Please acknowledge that you have sufficient details.

Mā te Wā

Defyd Williams
Papanui Heritage Group
email defydjoan@xtra.co.nz
phone 027-3894-179

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 08/05/2023

First name: Sarah

Last name: Smith

Consultation Document Submissions

Provision: Chapter 9 Natural and Cultural Heritage

Support

I seek the following decision from the Council

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

380 Pettigrews Rd, Pigeon Bay, Akaroa, which is the old Kikupa School site

My submission is that:

I wish the historic Kukupa school and surrounding area to be preserved and not developed, except for the existing single school building as it stands to be restored for either heritage value or use as is, but no change of use to accommodation.

Provision: Chapter 10 Designations and Heritage Orders

Support

I seek the following decision from the Council

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

380 Pettigrews Road, Pigeon Bay, which is the old Kukupa School building

My submission is that:

I would like to see Kukupa School protected and restored and the surrounding gardens and school grounds tidied up.

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date:	10/05/2023		
First name:	Bradley	Last name:	Nicolson
Organisation:	Oxford Terrace Baptist Church		
On behalf of:	Oxford Terrace Baptist Church		

Consultation Document Submissions

Provision: Chapter 9 Natural and Cultural Heritage

Seek Amendment

I seek the following decision from the Council

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

1- Clarify whether Medium or High Density Zone is applicable to 288 Oxford Terrace site and all associated lots.

2- That Chester Street East from Madras Street to Fitzgerald Avenue is included in the proposed Residential Heritage Area.

3- As the sentence stands at the moment, it reads that a High Density Zone would be the buffer. As this does not make any sense, we suspect that the wording needs clarification.

That the Plan Change 13 defines a buffer for RHA's, and how a buffer would be given effect.

4- To publicly notify a resource consent for any development on 94-96 Chester Street East.

My submission is that:

Submission from the Oxford Terrace Baptist Church to the Christchurch City Council's Proposed Plan Change 13

1 Reference the interactive map for 288 Oxford Terrace

The Oxford Terrace Baptist Church owns this site. The Consultation document advises to use this map to see what is proposed for each site. See <https://christchurchcity.maps.arcgis.com/apps/webappviewer/index.html?id=ad65227f17a8492aa9191f4c665a3d0a>

Our submission is: The map appears to have two different density zones on this site, namely a High Density Zone and a Medium Density Zone.

We seek the following decision from Council: Clarify whether Medium or High Density Zone is applicable to this site.

2 Chester Street East/Dawson Street Residential Heritage Area

The relevant document is 4Residential-heritage-areas-aerial-maps (pdf).

Our submission is: The proposed delineation of the Chester Street East/Dawson Street Residential Heritage Area (RHA) does not include the entirety of Chester Street East. The reasons for excluding the remainder of Chester Street East are not given in the Consultation document, so it is difficult to ascertain why the street would be thus divided.

We seek the following decision from Council: That Chester Street East from Madras Street to Fitzgerald Avenue is included in the proposed Residential Heritage Area.

3 Introduction of a buffer for Residential Heritage Areas

Reference is the document WEB-STR 5432-Housing-and-Business-Choice-and -Heritage-Consultation-document on page 24. To quote "Our proposal also includes introducing a buffer for RHAs, with a High Density border to better protect their edges."

Our submission is: This statement is very confusing, needs clarifying and explaining to assist in understanding exactly how a buffer would be given effect between an RHA and the surrounding zoning.

We seek the following decision from Council: As the sentence stands at the moment, it reads that a High Density Zone would be the buffer. As this does not make any sense, we suspect that the wording needs clarification. That the Plan Change 13 defines a buffer for RHA's, and how a buffer would be given effect.

4 Properties of interest to Oxford Terrace Baptist Church

The property at 94-96 Chester Street East has been derelict since the earthquakes as the previous houses were demolished. This site is adjacent to 98-100 Chester Street East which is owned by the Oxford Terrace Baptist Church, and which is proposed to be added to the Register of Historic buildings. Four significant heritage buildings are near this site.

Our submission is: The possible development of this site, if not done sympathetically and in character with 98-100 Chester Street East and the four other heritage buildings, will have a significant detrimental effect on the collective heritage and amenity values of this part of Chester Street East.

We seek the following decision from Council: To publicly notify a resource consent for any development on 94-96 Chester Street East.

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 10/05/2023

First name: Jono

Last name: De Wit

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:

To completely remove the PIKO/SHAND (RICCARTON BLOCK) STATE HOUSING HERITAGE AREA from PC13 or reduce it in size to something like the 5 most important houses in terms of heritage, and make the area HRZ zone.

My submission is that:

I oppose the PIKO/SHAND (RICCARTON BLOCK) STATE HOUSING HERITAGE AREA because it is very close to the Riccarton road public transport corridor which is one of the most important public transport corridors in the city. It is also the proposed route for the future MRT line so it is very important to allow higher density of homes to be built in this area. I do not believe the heritage value of the state houses in the area comes close to the importance of allowing more people to live close to the Riccarton road public transport corridor. The area is also surrounding a number of green spaces including the great Harrington park. The Piko/Sahnd heritage area would also limit the number of people who can live a short walk from this park which is another reason I oppose it.

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 10/05/2023

First name: Joanne

Last name: Nikolaou

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:

That Council agrees to zone / designate the Cashmere View Somerfield Area as a character area with appropriate planning protection of the neighbourhood.

See supporting report for extent of area and supporting evidence.

This submission proposes the 'Cashmere View Somerfield Area' (CSA) is zoned with a character overlay to ensure the retention of qualities that make it distinctive and appealing resulting in an attractive and memorable area in Christchurch City. The report attached as evidence will illustrate the CSA has significant special qualities to the area which parallel two nearby current Character Areas Tainui Street and Beckenham Loop. This is particularly timely in light of the proposed medium density housing planning changes which would eradicate the neighbourhood heritage value of this area.

This report seeks to identify the neighbourhood of CSA as containing these qualities and confirm the area as worthy of protection. Cashmere View Somerfield Area has city-wide significance as an **intact residential neighbourhood with a strong sense of place and identity**.

Nearly 90% of the properties in this area (as at April 2023) retain their original bungalow features.

The key elements that contribute to the character of CSA are:

1. A high proportion of original houses from early to mid 20th century primarily consisting of single storey villas and bungalows, some wooden bungalows, some brick bungalows and some excellent examples of Art Deco houses.
2. An original suburban reserve (Cashmere View Park) set aside for recreational activities to support the 1925 subdivision and development of the area.
3. Houses in the area contribute to a sense of neighbourliness with low boundary fencing and unobstructed views to and from the houses and the street.
4. Architectural detailing contributes to a richness in house design and consistency is established through the location, scale and proportion of windows and entrances.
5. A memorable geography with a regular street grid finishing at the meandering Heathcote River edge.
6. Attractive streets with established front and side gardens that are richly planted and contain lawns, shrubs and trees, generous street widths, mature street trees and grass berms.
7. The size, form and scale of houses, location of houses on sections are generally consistent along streets.
8. Houses in the area contribute to a sense of neighbourliness with low boundary fencing and unobstructed views to and from the houses and the street.
9. Architectural detailing contributes to a richness in house design. Consistency is established through the location, scale and proportion of windows and entrances.
10. Mature trees within properties provide landscape amenity to the area. High levels of street amenity with established front

gardens, generous street widths, mature street trees and grassed berms.

This submission seeks to illustrate the high percentage of heritage value properties that still exist in the CSA area.

- A. 89% of Properties Classic Examples of Bungalow Architecture 1925 – 1945.
- B. Only 5% (or 4 Properties) contemporary homes without any heritage value.
- C. 1 extraordinary example of Art Deco Architecture.

5% or 4 New builds with Bungalow type classical features fitting in with the neighbourhood

My submission is that:

This submission proposes the 'Cashmere View Somerfield Area' (CSA) is zoned with a character overlay to ensure the retention of qualities that make it distinctive and appealing resulting in an attractive and memorable area in Christchurch City. The report attached as evidence will illustrate the CSA has significant special qualities to the area which parallel two nearby current Character Areas Tainui Street and Beckenham Loop. This is particularly timely in light of the proposed medium density housing planning changes which would eradicate the neighbourhood heritage value of this area.

See attached supporting document for extents of area and supporting evidence.

This submission seeks to identify the neighbourhood of CSA as containing these qualities and confirm the area as worthy of protection. Cashmere View Somerfield Area has city-wide significance as an **intact residential neighbourhood with a strong sense of place and identity**.

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5% or 4 New builds with Bungalow type classical features fitting in with the neighbourhood

Attached Documents

Name
Cashmere View Somerfield Character Area Report

Cashmere View Somerfield Area 'CSA'
Heritage and Character Assessment

Report April 2023

Ashgrove Terrace

Fairview Street

Cashmere View Street

Rose Street



Contents

1. Executive Summary
2. Historical summary
3. Character Areas and Historical Value
4. Desktop Analysis
5. Character Elements
6. On Site Assessments
7. Cashmere View Somerfield Area Character
8. CSA Character Areas Examples
9. CSA Property Categorisation
10. Map and Archive Information

Author

Joanne Nikolaou

Bachelor of Architectural Studies University of Auckland

Bachelor of Architecture University of Auckland

This report has not been peer reviewed

April 2023

List of abbreviations

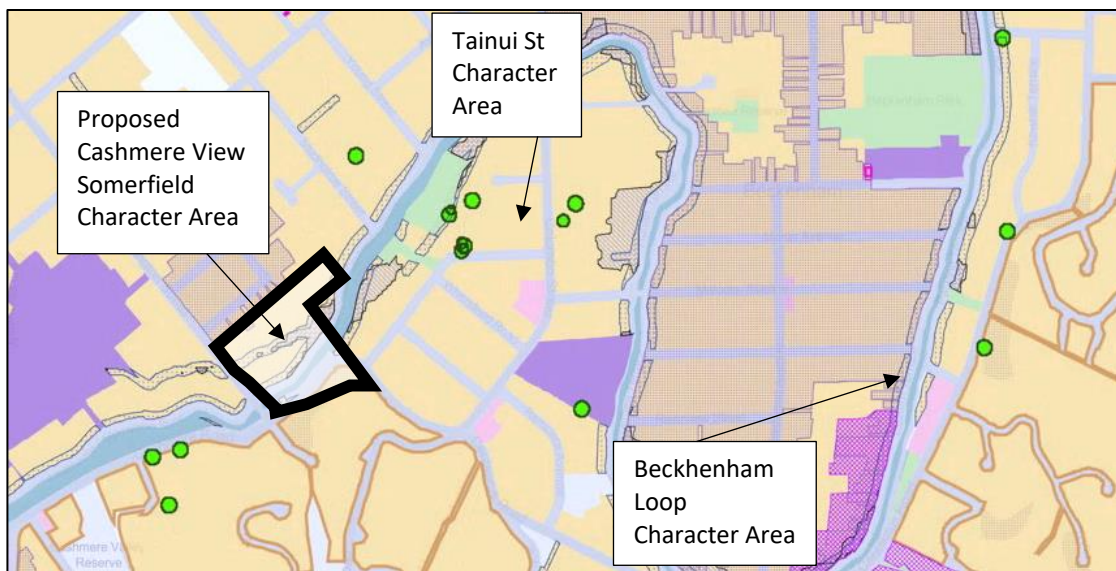
Cashmere View Somerfield Area: CSA

Christchurch City Council: CCC

Executive Summary

This report sets out an analysis of 'Cashmere View Somerfield Area' (CSA) as a neighbourhood with historic value and suburban character in Christchurch. The report uses the methodology and definitions set out by the Resource Management Act, Historic Places Trust, and the Methodology and guidance for evaluating Auckland's historic heritage as well as others listed in the sources.

The report proposes the 'Cashmere View Somerfield Area' is zoned with a character overlay to ensure the retention of qualities that make it distinctive and appealing resulting in an attractive and memorable area in Christchurch City. The report will illustrate the CSA has significant special qualities to the area which parallel two nearby current Character Areas Tainui Street and Beckenham Loop. This is particularly timely in light of the proposed Plan Change 13 and 14 which would irretrievably undermine the character value of the neighbourhood.



In the 2015 report prepared by BECA Consultants for Christchurch City Council they note;

“Character Areas are generally located in more established areas of the city – containing all or a combination of landscape and built qualities including: dwellings of a certain style or era; dwellings with strong relationships to the surrounding environment; dwellings with high quality landscape features; and landscapes, streetscapes and topography of a unique character or high amenity.”

This report seeks to identify the neighbourhood of CSA as containing these qualities and confirm the area as worthy of protection. Cashmere View Somerfield Area has city-wide significance as an **intact residential neighbourhood with a strong sense of place and identity**. The key elements that contribute to the character of CSA are:

- 1) A high proportion of original houses from early to mid 20th century primarily consisting of single storey villas and bungalows, some wooden bungalows, some brick bungalows and some excellent examples of Art Deco houses.
- 2) An original suburban reserve (Cashmere View Park) set aside for recreational activities to support the 1925 subdivision and development of the area.
- 3) Houses in the area contribute to a sense of neighbourliness with low boundary fencing and unobstructed views to and from the houses and the street.
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- 9) Architectural detailing contributes to a richness in house design. Consistency is established through the location, scale and proportion of windows and entrances.
- 10) Mature trees within properties provide landscape amenity to the area. High levels of street amenity with established front gardens, generous street widths, mature street trees and grassed berms.

What is historic heritage?

The Resource Management Act 1991 define historic heritage as the natural and physical resources that contribute to an understanding and appreciation of New Zealand's history and cultures, deriving from any of the following qualities:

- Archaeological
- Architectural
- Cultural
- Historic
- Scientific
- Technological

Importantly a lack of understanding of historic heritage values often leads to loss of New Zealand heritage. In the case of the Cashmere View Somerfield Area the value is in the strong recognisable architectural history of the houses in the area.

Character Areas and Historic values

Character Area provisions do not seek to control demolition or removal of character buildings, however they do have modified, or additional, rules and provisions to the standard living rules in the District Plan that recognise their special characteristics. The intention of the Character Areas is to Recognise individual elements and resulting character of each area and allow for management of the area as a whole. ⁽¹⁾

- Manage the collection of features, buildings and places to avoid the incremental loss of character values
- Provide the ability to manage redevelopment of properties and elements within a Character Area which do not currently contribute to the character values
- Recognise the importance of the setting, surroundings and context of distinctive residential environments. ⁽¹⁾

An assessment of historic and character heritage values should include a well-documented review of the properties which together create the special character of a neighbourhood. History includes not just the construction of a single place, but the context of many homes and how these combine to create an overall street scape. Primary sources, such as maps or government records, are more reliable than secondary sources, like newspaper articles so in this case Maps have been used as the main source to date the properties.

¹ As outlined by Christchurch City Council in their briefing document (Christchurch City Council-District Plan Review-Character Areas Draft Brief 2014-11-10)

Desktop Analysis

Using the Christchurch City Council's GIS Maps on Canterbury Maps, a detailed desktop analysis was undertaken for each of the proposed Character Areas, to establish an initial understanding of the consistency and cohesiveness of the underlying character and to identify:

- Buildings approximate age (based on historic maps of the area)
- Buildings which are contemporary and not historically valuable or Post Character Area dating from 1980s (including the modification to existing buildings, construction of new dwellings or construction of ancillary buildings)
- The location of any heritage listed buildings

Character Elements

The assessment of the Character Area included a review of both the elements located within private property, and the public space elements of the streetscape. While streetscape character contributes to the overall character of an area, the character elements of private property were the primary focus of the character assessment. The elements have been reviewed in line with the Tainui Street and Beckenham Loop Character Areas which are already in place. **These two areas provide a good example of neighbourhoods with similarly consistent heritage elements to the proposed Cashmere View Somerfield Character Area (CSA).**

On-Site Assessment

Assessments of the CSA were undertaken in April 2023, using the following methodology:

- Architect carried out site visit in order to assess individual properties, the streetscape and record data within the proposed boundary area.
- A walk through of the Character Area was then undertaken and the site record sheet completed (including individual property classifications and streetscape assessments)
- Representative photographs of each Character Area were taken to illustrate the general streetscape character, examples of dwellings / properties that were primary, contributory, neutral and intrusive in classification.
- Site notes were recorded, including a general summary of each home

Cashmere View Somerfield Area Description

Streetscape

The proposed Cashmere View Somerfield Character Area is located at the base of the Cashmere Hill in the south west of the city and is bounded by the Heathcote River. It consists of all the properties visible along Fairview Street, Cashmere View Street and parts of Rose Street and Ashgrove Terrace directly across from the river.

The neighbourhood is proposed as a Character Area because of the strong relationship between the buildings and the street, the general consistency in scale, form, and style of the buildings (generally single storey bungalow weatherboard or brick houses which are mostly constructed between 1925 and 1945) and the abundance of mature soft landscaping both within and at the boundaries to the properties.

The streets are generally on a grid pattern with extended berms with slight road angle changes to reinforce the slow pedestrianised street scape. The subdivision was developed around 1925 and the first homes are clearly seen finished and occupied in the 1929 maps.

The street pattern has resulted in some triangular and irregularly shaped lots adjacent to the river fronting properties, with lot and house orientation varying accordingly. Lots also vary from street to street both in depth and width.

The streets are unified by their setting – the striking backdrop of the Cashmere Hills – with differing spatial qualities, due to their different widths and the variety in lot size. The area retains a quality of ‘river edge’ with the street scape meandering down to the Heathcote river and associated mature trees and landscaping.



Setback from Street

Homes located within the area have a range of building setbacks from 4 – 20m apprx. Those on Cashmere View and Ashgrove Terrace have wider setbacks the setbacks seem to increase the closer to the Heathcote River the property is. Properties containing older housing stock average approximately 5 - 8m apprx. There is consistency along the streets.

Boundary Treatment – Planting / Fencing

The fences on the street side are generally low or allow for significant visual connection between the house and the street. The majority (over 50%) of properties have established gardens which assist in forming the boundary between the pedestrian pathways and the property. A small proportion (less than 20%) of houses have garages located at the front of properties. This is often a feature of newer housing typologies and forms a visual barrier between the street and the dwelling. A few properties have high vegetation along the boundary which is used as visual screen blocking houses from the street.

Landscape Characteristics

75% of properties contain mature vegetation and have generous side setbacks giving overall established garden setting to much of the area. Even contemporary buildings have setbacks however there are one or two examples where the homes have been designed to maximise site cover this character has been eroded.

Built Form Elements Dwelling Style / Era

The proposed area is an excellent example of a neighbourhood which retains a significant proportion of example of the New Zealand Bungalow Style. This house design style celebrates the practicality of the arts and crafts movement. The majority of houses were constructed between 1925 and 1945. Common architectural elements include gabled or hipped roofs bay windows and side entry porches. Ornamentation is simple Bungalow Style with the use of dentils, bay window detailing and elements set around the entry porches. There is also a particular special example of an Art Deco home. The original building materials in the proposed Character Area were corrugated metal roofs, brick chimneys, timber windows and painted horizontal timber weatherboards. Many of the dwellings retaining these materials and highlight architectural features in darker colours that contrast with the paler weatherboards. A significant amount of recent renovations have been undertaken to maintain and highlight the Bungalow features of the homes by the residents.

Relationship to Street / Visual Connectivity

Many of the properties have low boundary walls to match the building or medium-height timber fences, with significant visual connectivity. The front doors and windows to habitable rooms are mostly at the front, enabling a visual connection between the house and the street. This connection remains strong for much of the Character Area, except where high solid fences and/or very dense mature vegetation screens the property from view.

CSA Visual Inspection Heritage Examples



113 Ashgrove Terrace

- Wide Berms and set back
- Established Landscaping and Treescapes
- Excellent Art Deco Example
- Art Deco Detailing Retained and Renovated
- Heathcote Rivers Edge
- Home Architecturally Responds to Corner Site with set back and scale



10 Fairview Street

- Wide Berms
- Established Landscaping
- Historical Complimentary Renovation
- Low Boundary Fences Unobstructed Views to and from House to Street
- Bungalow Architectural Detailing



7 Fairview Street

- Wide Berms
- Historical Complimentary Renovation
- Low Boundary Fences Unobstructed Views to and from House to Street
- Bungalow Architectural Detailing
- Scale and Proportion of Bungalow Windows and Entrances leads to consistency along the street



15 Fairview Street

- Original Low Volcanic Stone Boundary Fence
- Renovated Early 20th Century Bungalow
- Size form and scale of these Bungalow homes adds to the richness in neighborhood character.
- Wide grassed berm area



Fairview Street Scape

- Mature Trees planted during original sub division 1925 - 1935
- Wide grassed berm areas
- Majority Single Story Bungalows with weatherboard cladding



37 Fairview Street

- Alternative Layout Bungalow Later 1930s
- Established Landscaping and Treescapes
- Single Story Bungalow Detailing
- Unobstructed views to street and low boundary fence



112 Rose Street

- Alternative Layout Bungalow Later 1930s Distinctive Detailing
- 2nd Story Renovation Likely Mid Century
- Bungalow Detailing
- Established Garden



Cashmere View Street Scape

- Mature Trees planted during original sub division
- Wide Street and grassed berm areas
- Majority Single Story Bungalows
- Low fences for high visibility and street connection
- Established Gardens



Cashmere View Street Bungalows

- Original Houses Renovated to retain architectural character
- Wide Street and grassed berm areas
- Low fences for high visibility and street connection
- Established Gardens



14 Cashmere View Street

- Original Houses Renovated to retain architectural character
- Wide Street and grassed berm areas
- Low fences for high visibility and street connection
- Established Gardens



20 Cashmere View Street

- Original Bungalow Renovated to retain architectural character
- Wide Street and grassed berm areas
- Established Garden
- Significant Bungalow Architectural Detailing retained

CSA Categorisation of Properties



Map Legend Mapped as at April 2023

Dates are estimations based historical maps and architectural features

Street Scape Quality High	
1925 - 1930 Bungalow (30%)	
1930 - 1945 Bungalow (59%)	
1950s + Art Deco (1%)	
New Build Bungalow Features (5%)	
New Build Contemporary (5%)	

This map seeks to illustrate the high percentage of heritage value properties that still exist in the CSA area.

- A. 89% of Properties Classic Examples of Bungalow Architecture 1925 – 1945.
- B. Only 5% (or 4 Properties) contemporary homes without any heritage value.
- C. 1 extraordinary example of Art Deco Architecture.
- D. 5% or 4 New builds with Bungalow type classical features fitting in with the neighbourhood.

Map and Archive Information

This report seeks to evaluate the Cashmere View Somerfield Area as a historic heritage place for potential inclusion in the historic heritage area in Christchurch. The information from historic Maps has provided a basis for analysis of the properties. Fairview Street was named in 1927 by Tomas Sydney Dacre. Somerfield was previously part of a mid 19th century farm owned by brother Edward Bishop and Frederick Bishop who were born in Somerfield England.

Press Issue 19104 13 September 1927

NAMES OF STREETS.

CITY COUNCIL DISCUSSION.

There was a brief discussion at last night's meeting of the City Council concerning a proposal to name the new street through land which is being subdivided in Spreydon "Fairview street."

In recommending that such a name should be adopted the By-laws Committee reported:—There is already a street in the City named "Fairfield avenue," but it is not considered that these two names will lead to confusion.

The Mayor said that a certain land agent had gone to the expense of printing a number of circulars advertising the locality and had stated that if the name were altered it would involve him in a loss. He objected to the proposal of the Council being used for commercial purposes. The Council should be consulted first in such cases.

Cr. J. W. Roberts thought that confusion was likely to be caused if such names were duplicated or names very much alike were allowed to be used. He mentioned Bealey avenue and Bealey street.

The Mayor: It was done to oblige one man.

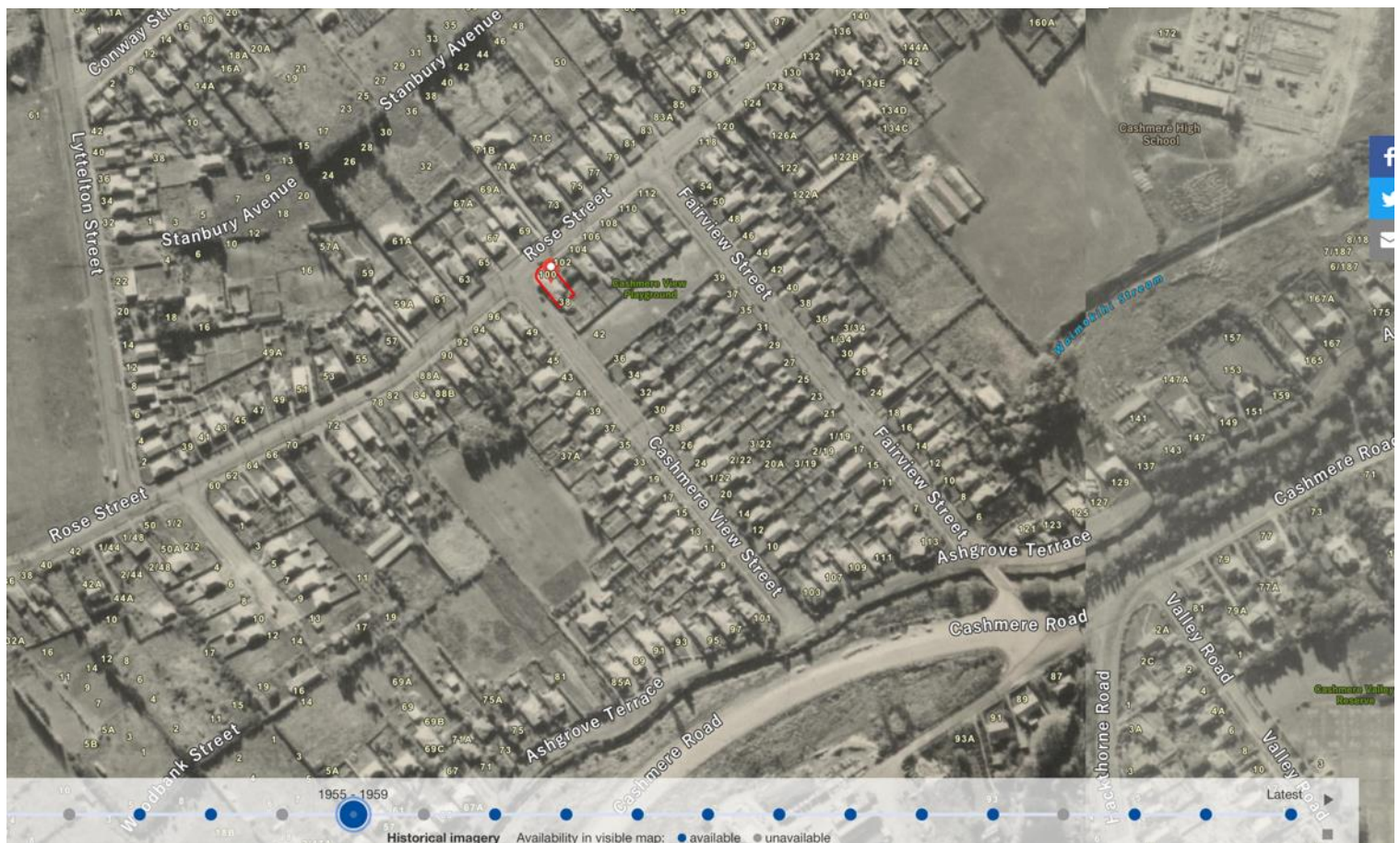
Cr. D. G. Sullivan: I have no objection to taking back the clause.

This course was agreed to.



Aerial Photograph 1927
Canterbury Maps April 2023

Aerial Photograph 1955
Canterbury Maps April 2023





Aerial Photograph 1958
Canterbury Maps April 2023

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 11/05/2023



First name: Anita

Last name: Collie

Organisation: The Rannerdale Trust

On behalf of: The Rannerdale Trust

Attached Documents

Name	
Rannerdale - Plan Change 13 Submission - FINAL	
Attachment A RMA20223600 Decision and Approved Plan	

Form 5

Submission on notified proposal for policy statement or plan, change or variation

Clause 6 of Schedule 1, Resource Management Act 1991

To: **Christchurch City Council**

Name of Submitter: **The Rannerdale Trust**

Introduction

1. The Christchurch City Council (**Council**) have publicly notified Plan Change 13 (**PC13**) to the Christchurch District Plan (**District Plan**) to introduce eleven new residential heritage areas across the Christchurch City for protection in the District Plan and adding around 60 buildings, items and building interiors to the Schedule of Significant Historic Heritage.
2. This is a submission on PC13 to the Christchurch District Plan made by The Rannerdale Trust (**the submitter**).
3. The submitter owns the property legally described as Lot 1 DP 481213 as held within the Record of Title 674019, located at 59 Hansons Lane, Christchurch (**the Site**).
4. A heritage building "Stevenholme House" is located on the property and the surrounding land is subject to a heritage setting overlay. The submitter is directly affected by PC13.
5. The property is located within the Residential Suburban Zone under the operative District Plan and is proposed to be split zoned High Density Residential zone and Medium Density Residential zone under Plan Change 14 (**PC14**).

Specific provisions of the plan change that this submission relates to

6. The Submitter has an interest in the plan change as a whole and is therefore this submission relates to all provisions of PC13. The submitter has a particular interest in all matters that affect the submitters property.

Submission

7. The submitter **opposes** the proposed plan change as notified:
 - (a) The protection of historic heritage from inappropriate subdivision, use, and development is a matter of national importance that is required to be recognised and provided for – section 6(f) of the Resource Management Act 1991.
 - (b) PC13 as notified is unreasonable in its coverage of the submitter's property against the backdrop of section 6(f) and affords

protection to parts and features of the property that should not be afforded protection as historic heritage.

- (c) The proposed heritage setting contained in PC13 does not reflect the existing, modified environment. The relief proposed by the submitter provides more refined identification of the particular heritage setting that the building sits within and includes the gardens surrounding the building. The access and parking areas are modern and do not in themselves have heritage value, and they serve more than just the heritage building.
- (d) The vehicle access and parking areas do not meet the District Plan definition of *heritage setting* (as amended by PC13). These features do not contribute to the heritage values of Stevenholme House, nor are they integral to its contextual heritage values and its function, meaning and relationships.
- (e) Access to Stevenholme House is protected by way of easement in favour of the Stevenholme property, noting that both properties are privately owned and there is no public access to either. This is considered the most appropriate mechanism to ensure that Stevenholme House retains access from the road.
- (f) Imposition of a heritage setting overlay over the vehicle access unduly restricts activities within the heritage setting area, which (within the vehicle access and parking areas) will have no impact on heritage values associated with Stevenholme House.
- (g) The modern parts of the site do not contribute to the heritage value of Stevenholme House, nor accord with the District Plan definition of a heritage setting, as they are not integral to its function, meaning or relationships. For these reasons, they should be removed from the heritage setting extent.

8. Amending PC13 as notified will:

- (a) recognise and provide for the heritage values of the property and provide the necessary protection.
- (b) meet the reasonably foreseeable needs of future generations.
- (c) represent the most appropriate means of exercising the Council's functions, having regard to the efficiency and effectiveness of the provisions relative to other means.
- (d) give effect to the National Policy Statement for Urban Development 2021 (**NPS-UD**) and Canterbury Regional Policy Statement.
- (e) promote the sustainable management of natural and physical resources, will be consistent with Part 2 of the Resource Management Act 1991 and ultimately achieve its purpose.

Relief Sought

9. The submitter seeks the following relief:
 - (a) change the extent of the heritage area surrounding Stevenholm House (also known as Rannerdale House and Kauri House) to reflect the recent subdivision of the wider property (RMA20223600, **Attachment [A]**), shown in **Figure 1** below;
 - (b) remove the vehicle access from Suva Street, driveway and parking areas from within the heritage setting boundary;
 - (c) any other additional or consequential relief to the District Plan, including but not limited to, the maps, issues, objectives, policies, rules, controls/discretions, assessment criteria and explanations that will fully give effect to the matters raised in this submission and the relevant planning legislation.

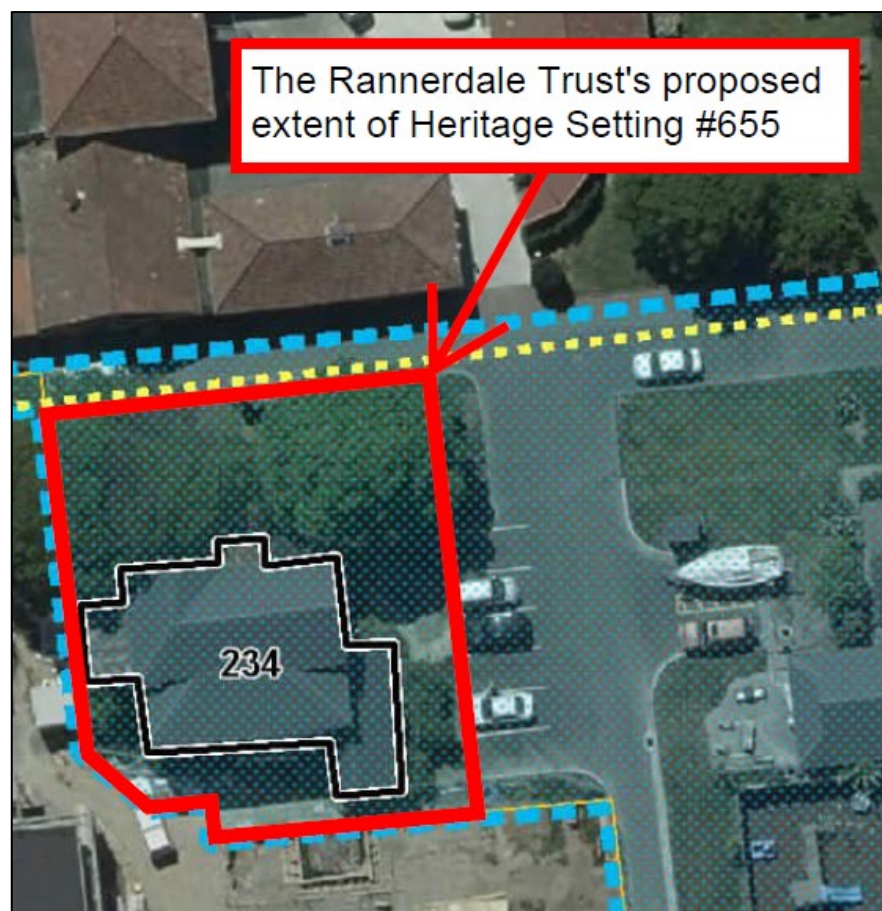


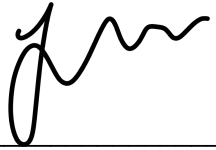
Figure 1 Proposed Heritage setting for the home (655) located within the red boundaries (Town Planning Group)

Other

10. The submitter could not gain an advantage in trade competition through this submission.
11. The submitter wishes to be heard in support of this submission.

12. If others make similar submissions, the submitter will consider presenting a joint case at any hearing.

DATED 10 May 2023

pp.  _____

The Rannerdale Trust

Encl: Attachment [A] Consent RMA20223600

Address for Service: Town Planning Group
PO Box 35
Christchurch 8014

Contact Person: Anita Collie
Cell: 021 568 335
E-mail: anita@townplanning.co.nz

Attachment [A]

Report / Decision on a Non-notified Subdivision Consent Application

Sections 95A / 95B and 104 and 104C

Application Number: RMA/2022/3600
Applicant: The Rannerdale Trust
Site address: 59 Hansons Lane
Legal Description: Lot 1 DP 481213
Zoning: District Plan - Residential Suburban
 Proposed Plan Change 14 – High Density Residential and Medium Density Residential
Overlays and map notations: District Plan - Christchurch International Airport Protection Surfaces; Riccarton Wastewater Interceptor Catchment Overlay; Heritage Item and Heritage Setting
 Proposed Plan Change 14 – Sunlight Light Qualifying; Large Local Centre Intensification; Heritage Item; Heritage Setting Proposed and Heritage Setting
Activity Status - subdivision: Restricted Discretionary
Activity Status - land use: Restricted Discretionary
Activity Status - NESCS: Controlled
Description of Application: Three Lot Fee Simple Subdivision

The proposal

This application is to subdivide an existing fee simple title into three fee simple allotments. The subdivision is around existing buildings on the site.

Relevant rules and activity status

Christchurch District Plan

The site is zoned Residential Suburban

Land use rules

The proposal requires land use consent for a restricted discretionary activity under the following rule(s):

Activity status rule	Standard not met	Reason	Matters of control or discretion	Notification clause
8.9.2.3 RD1	8.9.2.1 P1 a. Earthworks volume and depth	The proposed earthworks will exceed the 20m ³ maximum volume in Table 9 - approximately 38m ² is proposed.	8.9.4 Matters for discretion: 8.9.4.1 - Nuisance 8.9.4.3 - Land stability 8.9.4.6 - Amenity	Must not be publicly notified

Subdivision rules

The proposal requires subdivision consent for a restricted discretionary activity under the following rule(s):

Activity status rule	Standard not met	Reason	Matters of control or discretion	Notification clause
8.5.1.3 RD11		Lot 2 has a heritage item and setting on the site	Rule <u>8.7.4</u> ;	8.4.1.1

Access from the application site is off Suva Street, which is classified in the District Plan as a local road and Hansons Lane is classified as a collector Road.

National Environmental Standard

The National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health (NES) controls subdivision of land and soil disturbance where an activity on the Hazardous Activities and Industries List (HAIL) is being carried out or is more likely than not to have been carried out.

In this case it is more likely than not that a HAIL activity is being or has been undertaken on the site. The applicant has submitted a detailed site investigation (DSI) stating that the soil contamination does not exceed the applicable standard. Pursuant to Regulation 9(3) a controlled activity resource consent is required, with Council reserving control over the adequacy of the detailed site investigation.

Plan Change 14 Housing and Business Choice

Plan Change 14 is also relevant to this proposal. This was notified on 17 March 2023 and proposes amendments to the objectives, policies and rules associated with residential development across relevant residential zones, in accordance with the Medium Density Residential Standards in Schedule 3A of the RMA (as modified by the sunlight access/recession plane qualifying matter). Plan Change 14 also includes other residential intensification provisions and seeks to amend the objectives, policies and rules associated with commercial development within and around the central city, suburban commercial centres and planned high frequency and capacity public transport.

In terms of PC14 and the MDRS, the site is identified as being within a qualifying matter area Sunlight Light Qualifying and Residential Character Area. As a result, the rules do not have immediate legal effect given section 86BA(1)(c)(ii) and the operative district plan rules continue to apply. While the objectives and policies have legal effect from the date of notification, Policy 2 of the MDRS requires that the MDRS (including the objectives and policies) cannot be applied where a qualifying matter is relevant.

The plan change is currently open for submissions and no rules are in legal effect, other than those relating to heritage matters. There are no heritage matters relevant to this application.

Effects on the environment and adversely affected persons [Sections 95D, 95E and 104(1)(a)]

Subdivision

As a restricted discretionary activity the assessment of the effects of the subdivision is limited to the matters over which the Council has limited its discretion outlined in Chapter 8 of the Christchurch District Plan.

Heritage

Council's Principal Planner, Amanda Ohs has reviewed the application and has advised the following:

"This application proposes subdivision of the heritage setting of the former homestead Stevenholme and later veteran's home Rannerdale House, a Significant scheduled heritage item in the Christchurch District Plan, this is a restricted discretionary activity.

The proposed subdivision reduces the land parcel for the scheduled heritage item to the area immediately adjacent to the heritage item, and including the grassed area in front, with two established trees, and carparks. It excludes the driveway and access which are included in both the operative setting and the proposed changed setting included in PC13. The subdivision provides for ongoing access to the existing stormwater systems. The proposal excludes the recent developments to the south and west of the heritage item from the land parcel containing the heritage item.

I note that the earthworks to create the raingarden were done in 2017 after the District Plan rule requiring consent for earthworks within 5 m of a scheduled heritage item came into effect (Sept 2016) and no resource consent was obtained for the works. It is accepted that drainage issues on site needed to be addressed, however the present raingarden solution is incompatible with the heritage values of the house and setting. The area of battered slope directly on the eastern side of the dwelling leaves no area of setting or level foot access directly adjacent to the house, and the feature as a whole is visually intrusive, impacting heritage values, as it evident in the photograph below.



Conditions of consent related to landscape and planting improvements are proposed to achieve a considerable improvement of the visual appearance of the raingarden, and a reduction in its detrimental impacts on heritage values.

These conditions seek to level the area of batter between the house and 2m distance from the house to the height of the remainder of the setting, and add a low retaining wall on the eastern side at the 2 metre mark to provide a suitable formal demarcation between house and raingarden. A detailed planting plan by a landscape designer/architect of plants carefully chosen for their suitability for the raingarden, and of a sympathetic design for the setting of the house, with plants which do not obscure views to the house, and which serve to visually lessen the batter slope between the house and the 2m mark is also sought.

I have considered the proposal in terms of the Matters of Discretion at 8.8.12. The subdivision of heritage settings have the potential to impact the future usability and access to scheduled heritage items. The location of new buildings on land parcels created adjacent to the heritage item can also have impacts. New developments on newly created land parcels around heritage items have potential to either integrate the heritage item and give it prominence or impede its desirability for adaptive reuse. I note that the open space area around the house has already been incrementally eroded with developments over time – this means it is sensitive to further change and measures are needed to ensure the heritage values of the item and setting are retained with future development on the site.

The proposed new land parcel for the heritage item, together with maintained access from the driveway through a right of way, provides the minimum area required to access, use and appreciate the heritage item. There is sufficient area for parking, and also required services such as bins and required services to the building. Unfortunately no real certainty can be provided around the way the heritage item will be integrated into development on the newly created adjacent land parcels. This is for the new owners to determine. However the proposed subdivision enables (in that it does not negate) the ability for this integration to occur if the new owner chooses to develop the sites in such a way. It is hoped that the new owner and developer will continue to liaise with Council heritage staff regarding the future development – an initial site meeting was held in 2022.

The RFI response offered a condition of consent for a consent notice for a minimum setback requirement from the north side of the newly created land parcel containing the heritage item for any new buildings. This would ensure that the area immediately to the north of the heritage item remains as open space, thus protecting the visual appreciation of the heritage item and reducing potential for adverse effects on heritage values of future development on the adjacent site. A condition of consent addresses this.

If Lot 2 is sold into separate ownership and developed separately from the remainder of the lots created in this subdivision proposal, there may be a future desire or need to fence the boundary of the land parcel. As this fencing has potential to interrupt views to the heritage item, and be incompatible with its contextual values and setting, a condition is proposed to address any future fencing on the site.”

Ms Ohs considers the proposed conditions and proposal to be acceptable. I adopt Ms Ohs' assessment and note the applicant has agreed to similar conditions, which achieve this purpose. Overall, I consider the effects less than minor.

Earthworks

Earthworks to create the rain garden and retaining wall were undertaken in 2017 after the District Plan rule requiring consent for earthworks within 5m of a scheduled heritage item came into effect (Sept 2016) ¹. No resource consent was obtained for the works. It is accepted that drainage issues on site needed to be addressed, however the present raingarden solution is incompatible with the heritage values of the house and setting. This has been addressed above. The earthworks will comply with all the other activity standards, including the volume and depth limitations. The raingarden is 0.55m deep based on the ECan consented design plans and substantially less than 20m³ in volume.

The applicant has provided the following assessment:

In regard to 8.9.4.1 (Nuisance effects), the works are very small scale, and are isolated from neighbouring properties by distance, intervening buildings and vegetation and fencing. The scale and location of earthworks means that it is possible that neighbours will not even be aware that they occur. Dust and sediment will be contained within the site and garden area, noting that any dust or sediment travelling to the adjacent sealed area (still within the site), will be swept back into the garden area. Potentially one or no heavy vehicle movements will be required to carry out the works, with this having negligible effects on the road network. Change in ground level will not affect trees, as the affected area is currently unplanted. Adverse effects on any other matters of discretion are indiscernible due to the nature and location of earthworks.

The matters of discretion listed in 8.9.4.2 – 5 and 7, 9 and 10 are not relevant due to the scale and significance of the earthworks. In regard to 8.9.4.6 (amenity), the area of works is within the site and not visible to the general public, and the proposed work will enable planting which will improve the amenity of the work area.

8.9.4.9 cross references to Rule 9.3.6.1 relating to heritage matters. The proposed retaining wall and earthworks to form the raingarden are located approximately 2m from the outer part of the heritage building foundation. Works will not impact or undermine the heritage building due to the nature and scale of work. The retaining wall will be installed utilising hand held tools or a small digger. The site will be planted as per the volunteered condition on completion of the works. The installation of the retaining wall enables an area of flat land to be established around the heritage building, which can then be planted to provide an appropriate degree of amenity. The installation of the raingarden provides for the drainage of stormwater away from the heritage building, thereby contributing to it's protection from ponding water."

I accept the applicant's assessment. Overall, the effects of earthworks to enable the construction of the raingarden and retaining wall are considered to be less than minor. Conditions for the earthworks are stated below in proposed conditions, which the applicant has accepted.

General Matters of Subdivision

All other General Matters under Chapter 8 have been assessed to determine the conditions of this consent. General matters include assessing criteria for subdivision design, transport networks, servicing and infrastructure and hazard constraints. Specialist inputs from council staff and relevant experts have been obtained. Servicing and infrastructure comments have been received from Mr Nigel Baker. Geotechnical factors have been assessed in the section 106 component of this report. Conditions of consent have been recommended to meet the relevant criteria. This includes conditions for services, infrastructure, building commitment and access construction. I consider that the matters requiring consideration contained within Rule 8.7.4 to be suitably addressed.

National Environmental Standard

The National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health (NES) controls subdivision of land and soil disturbance where an activity on the Hazardous Activities and Industries List (HAIL) is being carried out or is more likely than not to have been carried out.

In this case it is more likely than not that a HAIL activity is being or has been undertaken on the site. The applicant has submitted a detailed site investigation (DSI) stating that the soil contamination exceeds the applicable standard. Pursuant to Regulation 10(2) a restricted discretionary activity resource consent is required, with Council reserving discretion over the adequacy of the detailed site investigation, the suitability of the land for the activity, the approach to remediation, the adequacy of the site management plan, the transport,

The retaining wall included in the works is not classified as a building. It will be a maximum of approximately 0.5m high and 3m long (well less than 1.8m high and 6m² area), thereby meeting the retaining wall exemption in clause (f) in the exclusion list under the definition of building and no setback apply to the wall under the zoning rules.

disposal and tracking of soil, the requirements for and conditions of a financial bond, the timing and nature of review conditions and the duration of the consent.

Environmental Health Officer, Agnes van der Erf has reviewed the application and advised the following:

This site is listed on the LLUR as HAIL due to a fuel storage tanks. Although confirmation of the tanks removal has been received, it is likely that the former pipework is still on proposed Lot 3. As the site has not been fully investigated, the activity will be discretionary under the NESCS. As no soil disturbance is proposed, no conditions are required. The current listing on the LLUR will be sufficient to manage any future development on Lot 3

Overall, I consider the effects less than minor. The effects on the wider environment are no more than minor and there are no affected parties including neighbours.

Conclusion

The proposed subdivision is generally anticipated within the zone, and I consider that any adverse effects on the environment can be adequately mitigated by the recommended conditions of consent. The applicant has accepted the recommended conditions.

In regards to the land use component of this application, some non-compliances require a notification decision. The effects of these non-compliances are less than minor and there are no affected parties. I therefore recommend that this consent is processed as a non-notified application.

Notification assessment [Sections 95A and 95B]

Sections 95A and 95B set out the steps that must be followed to determine whether public notified or limited notification of an application is required.

Public notification

- Step 1. The application does not meet any of the criteria for mandatory notification in section 95A(2).
- Step 2. The application does not meet any of the criteria in section 95(A)(5) precluding public notification. Although Rule 8.4.1.1 a. precludes public notification of the subdivision consent there is no such rule for the land use activity.
- Step 3. There are no rules or NES requiring public notification, and any adverse effects on the environment will be no more than minor (section 95A(8)).
- Step 4. There are no special circumstances that warrant public notification (section 95A(9)).

Limited notification assessment

- Step 1. There are no affected groups or persons as outlined in section 95B(2) and (3).
- Step 2. The application does not meet any of the criteria in section 95B(6) precluding limited notification, as there are no rules precluding it and the application is not for a controlled activity land use consent.
- Step 3. No persons are considered to be affected under section 95E (sections 95B(7) and (8)).
- Step 4. There are no special circumstances that warrant notification to any other persons (section 95B(10)).

Conclusion on notification

There is no requirement for public or limited notification of either the subdivision or land use aspect of this application.

Other Section 104 matters

The application is:

- Consistent with the relevant objectives, policies and matters of control and discretion in the District Plan which essentially seek to maintain or enhance the amenities of the built environment, and ensure that the creation of new allotments does not adversely impact on physical infrastructure or the cost of its provision.
- Consistent with the relevant objectives and policies in Chapter 8 of the District Plan, as the new allotments will be appropriately designed and serviced for the anticipated purpose
- Able to be granted consent without public notification, pursuant to Section 104(3)(d).

For completeness, I note that the District Plan gives effect to the relevant higher order planning documents referred to in s104(1)(b). The Plan was competently prepared and appropriately reflects the higher order provisions, so they do not need to be specifically addressed in this report².

The National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health is relevant to the application as a HAIL activity is being carried out or is more likely than not to have been carried out on the land. The relevant provisions are discussed in previous sections of this report.

For completeness, I note that the District Plan gives effect to the relevant higher order planning documents referred to in s104(1)(b). The Plan was competently prepared and appropriately reflects the higher order provisions, so they do not need to be specifically addressed in this report³.

Taking guidance from the most recent case law⁴, the District Plan is considered to be the mechanism by which the purpose and principles of the Act are given effect to in the Christchurch District. It was competently prepared through an independent hearing and decision-making process in a manner that appropriately reflects the provisions of sections 5-8 of the Act. Proposed Plan Change 14 has commenced the implementation of the MDRS as required by the Act, and the objectives and policies proposed by the Plan Change and discussed above are intended to give effect to the National Policy Statement on Urban Development. As this site is within a qualifying matter area, the Plan change has signalled that intensification provisions of the MDRS are not considered appropriate on this site. The qualifying matter status is subject to challenge via submissions, but due to the early stage in the process I cannot give consideration to the MDRS in relation to this site.

Section 106

s106 Consent authority may refuse subdivision consent in certain circumstances

- (1) *A consent authority may refuse to grant a subdivision consent, or may grant a subdivision consent subject to conditions, if it considers that—*
- (a) *there is a significant risk from natural hazards; or*
 - (b) *(repealed)*
 - (c) *sufficient provision has not been made for legal and physical access to each allotment to be created by the subdivision.*
- (1A) *For the purpose of subsection (1)(a), an assessment of the risk from natural hazards requires a combined assessment of—*
- (a) *the likelihood of natural hazards occurring (whether individually or in combination); and*
 - (b) *the material damage to land in respect of which the consent is sought, other land, or structures that would result from natural hazards; and*
 - (c) *any likely subsequent use of the land in respect of which the consent is sought that would accelerate, worsen, or result in material damage of the kind referred to in paragraph (b).*

This section of the Act is particularly relevant in relation to geotechnical concerns following the Canterbury earthquakes.

The subdivision consent application seeks to subdivide site into three lots around existing buildings. The current use of the land will not change, and the subdivision is not likely to accelerate or worsen any natural hazard or increase the likelihood of material damage to the land or the buildings. It is therefore considered that there are no grounds to refuse consent under section 106(1)(a). In terms of section 106(1)(c) I am satisfied that adequate legal and physical access is provided to each allotment.

Recommendations

LAND USE CONSENT

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

² R J Davidson Family Trust v Marlborough District Council [2018] NZCA 316

³ R J Davidson Family Trust v Marlborough District Council [2018] NZCA 316

⁴ R J Davidson Family Trust v Marlborough District Council [2018] NZCA 316

- (B) That the application **be granted** pursuant to Sections 104, 104C, 108 and 108AA of the Resource Management Act 1991, subject to the following condition:
1. The development shall proceed in accordance with the information and plans submitted with the application.
 2. All earthworks associated with the creation and formation of the subdivision shall be carried out in accordance with the conditions of subdivision consent.

SUBDIVISION CONSENT

- (A) That the application be processed on a **non-notified** basis in accordance with Sections 95A – 95E of the Resource Management Act 1991.
- (B) That the application **be granted** pursuant to Sections 104, 104C and 106 of the Resource Management Act 1991, subject to the following conditions imposed pursuant to Sections 108, 108AA and 220 of the Resource Management Act 1991:

1. Compliance with Application Information

The survey plan, when submitted to Council for certification, is to be substantially in accordance with the stamped approved application plan.

2. Water Supply

All lots shall be supplied by individual water meters, as approve by 3 Waters for subdivision.

Existing reticulation between lots 1 to 3 is to be cut and sealed at the boundary.

New connections are necessary for Lots 1 and 2 and these will need to be applied for and connected to the existing buildings.

3. Heritage

Within 3 months of the date of consent being granted, the consent holder shall:

(a) Install a retaining wall between Stevenholme / Rannerdale House and raingarden 3 (identified in ECan consent plans CRC158135). The retaining wall is to be located at least 2m from the foundation of Stevenholme / Rannerdale House, and the land between the retaining wall and Stevenholme / Rannerdale House is to be flat, topsoiled and planted.

(b) Place topsoil and plant the area of raingarden;

(c) Planting required by (a) and (b) shall be specified by a suitably qualified landscape architect with stormwater engineer input as required.

(d) A detailed planting plan by a suitably qualified landscape architect of plants carefully chosen for their suitability for the raingarden, and of a sympathetic design for the setting of the house, with plants which do not obscure views to the house, and which serve to visually lessen the batter slope between the house and 2m distance from the house is sought. The plans and details of the landscaping, planting plan and retaining wall are to be submitted for acceptance to the Council's heritage team, a minimum of 10 working days prior to construction (email to rcmon@ccc.govt.nz Attn Heritage Team)

- 10 working days in advance of the commencement of landscape and retaining wall works, the consent holder will notify by email the Heritage Team Leader, Christchurch City Council (or nominee) of proposed temporary protection measures to protect the heritage fabric of the house during landscape works. The consent holder shall then regularly monitor the TPP to ensure that appropriate measures are being taken by the contractors at each stage of construction and advise contractors if any additional protection is required.

- At least 10 working days prior to the commencement of works associated with this resource consent, the consent holder shall notify by email the Heritage Team Leader, Christchurch City Council (or nominee) of the commencement of works.

- The consent holder, and all persons exercising this resource consent, shall ensure that all personnel undertaking works in connection with this consent are made aware of the consent conditions, and the approved consent plans during the induction process and for the duration of the works. A copy of these documents shall remain on site at all times.

- A digital photographic record of the affected areas of the heritage item and heritage setting is to be undertaken after the completion of the works. The record must be lodged with the Christchurch City Council's Heritage Team for their records within three months of the completion of the work. Images must be at least 1440 pixels by 960 pixels for a 4"x 6" print at a minimum resolution of 240 PPI. See advice note below.

4. Earthworks

All earthworks shall be carried out in accordance with a site specific Erosion and Sediment Control Plan (ESCP), prepared by a suitably qualified and experienced professional, which follows the best practice principles, techniques, inspections and monitoring for erosion and sediment control contained in Environment Canterbury's Erosion and Sediment Control Toolbox for Canterbury <http://esc.canterbury.co.nz/>. The ESCP must be held on site at all times and made available to the Council on request.

5. Telecommunications and Energy Supply

All lots shall have telecommunications and electrical supply laid to the net site area of each lot.

As-built plans and photographic evidence of the telecommunications and energy supply ducts or cables is to be supplied showing that the ducts or cables have been laid to the net area of each lot. Alternatively if the telecommunications connection is wireless, evidence that a sufficient connection can be achieved shall be provided.

The consent holder is to provide a copy of the reticulation agreement letter from the telecommunications network operator and a letter from the electrical energy network operator, or their approved agent, to confirm capacity is available to adequately service the sites.

6. No Build Area

No building is permitted within 4m of the southern boundary Lot 3 along the common boundary of Lot 2

Note: This is an ongoing condition and a consent notice will be issued.

7. Right of Way Easements (Private Ways)

The rights of way easements as set out on the application plan shall be duly granted or reserved.

8. Service Easements

The service easements as set out on the application plan or required to protect services crossing other lots shall be duly granted or reserved

8. Consent Notice

The following consent notice pursuant to Section 221 of the Resource Management Act 1991 will be issued by the Council:

No build area – Lot 3

No building is permitted within 4m of the southern boundary Lot 3 along the common boundary of Lot 2.

Note: Council will prepare the Consent Notice.

ADVICE NOTES FOR CONSENT HOLDERS, TO BE READ IN CONJUNCTION WITH THE DECISION

Lapsing of this consent

This resource consent for subdivision will lapse **5 years** after the date of commencement of consent (i.e. the date of this letter) unless it has been given effect to by the Council issuing a certificate pursuant to Section 223 of the Resource Management Act 1991.

Application may be made under Section 125 of the Resource Management Act 1991 to extend the duration of the resource consent, and this must be submitted and approved prior to the consent lapsing.

Lapsing of s223 Certification

The s223 certification will lapse **3 years** after the date of issue, the Section 223 certificate will lapse (if that certified plan has not been deposited in accordance with Section 224 of the Resource Management Act 1991). The s223 certificate can be re-certified only if the subdivision consent has not lapsed.

Your Rights of Objection

If you do not agree with the Council's decision on this resource consent application, the conditions, or any additional fees that have been charged, you may lodge an objection with the Council under Section 357 or 357B of the Resource Management Act 1991. You have 15 working days from the date you receive this letter within which to lodge your objection **to the decision**. Objections **to additional fees** must be received within 15 working days of the date on which you receive the invoice. Your objection must be in writing and should clearly explain the reasons for your objection.

Commencement of this consent

The commencement date for your resource consent is the date of this letter advising you of the Council's decision, unless you lodge an objection against the decision. The commencement date will then be the date on which the decision on the objection is determined

Development Contributions

No development contributions are payable on this consent.

Council Site Characteristics Information

The Councils Site Characteristics Information on this site is as follows:

Administrative Purposes	Guest accommodation (including whole unit listings on Airbnb; BookaBach; etc.) generally requires a resource consent in this zone when the owner is not residing on the site. For more information, please refer to: https://ccc.govt.nz/providing-guest-accommodation/ .
Built Features	Borelog/Engineer Report Image Available
Built Features	Council Records indicate that this site contains or contained a Tank Details of Tank are as follows: Date Installed: 01-01-1997 Tank Function: Diesel Volume(l): 10000 Underground or Above Ground: Above-ground Tank Status: Tank Does Not Exist Date Removed: 27-11-2008 Condition when Removed: Tank In Good Order TankID: 3272
Built Features	Council Records indicate that this site contains or contained a Tank Details of Tank are as follows: Date Installed: NA Tank Function: Diesel Volume(l): 15000 Underground or Above Ground: Underground Tank Status: Tank Does Not Exist Date Removed: 20-02-1997 Condition when Removed: NA TankID: 3273
District Plan	Property or part of property within the Christchurch International Airport Protection Surfaces overlay which is operative.
District Plan	Property or part of property within the Heritage Item overlay which is operative.
District Plan	Property or part of property within the Heritage Setting overlay which is operative.
District Plan	Property or part of property within the Christchurch District Plan (operative) Riccarton Wastewater Interceptor Catchment Overlay
District Plan Zone	Property or part of property within the Residential Suburban Zone which is operative.
Ecan Requirement	There may be objectives, policies or rules in a regional plan or a regional bylaw that regulate land use and activities on this site. Please direct enquiries to Canterbury Regional Council (Environment Canterbury).
Flooding Related	This property is not in a tsunami evacuation zone. It is not necessary to evacuate in a long or strong earthquake or during an official Civil Defence tsunami warning. Residents may wish to offer to open their home to family or friends who need to evacuate from a tsunami zone, and should plan with potential guests to do so in advance. More information can be found at https://ccc.govt.nz/services/civil-defence/hazards/tsunami-evacuation-zones-and-routes/
Ground Characteristic	Christchurch City Council holds indicative information on liquefaction hazard for Christchurch. Information on liquefaction, including an interactive web tool, can be found on the Council website at ccc.govt.nz/liquefaction . Depending on the liquefaction potential of the area that the property is in, the Council may require site-specific investigations before granting future subdivision or building consent for the property.
Land	Land Information New Zealand (LINZ) engaged Tonkin and Taylor to provide a

Characteristic Other	Geotechnical Report on Ground Movements that occurred as a result of the Canterbury Earthquake Sequence. The report indicates this property may have been effected by a degree of earthquake induced subsidence. The report obtained by LINZ can be accessed on their website at https://www.linz.govt.nz and search Information for Canterbury Surveyors.
Protected Tree	This site contains a tree which was required by a condition of subdivision. This tree is protected. If you are propose to remove the tree, the agreement of council is required and early consultation with council subdivision staff is recommended.Species Name: Fagus sylvatica (European Beech) Crown Width (m): 20.00 Height (m): 15.00
Protected Tree	This site contains a tree which was required by a condition of subdivision. This tree is protected. If you are propose to remove the tree, the agreement of council is required and early consultation with council subdivision staff is recommended.Species Name: Fagus sylvatica 'Purpurea' (Copper Beech) Crown Width (m): 18.00 Height (m): 16.00
Protected Tree	This site contains a tree which was required by a condition of subdivision. This tree is protected. If you are propose to remove the tree, the agreement of council is required and early consultation with council subdivision staff is recommended.Species Name: Ginkgo biloba (Ginkgo) Crown Width (m): 8.00 Height (m): 11.00
Protected Tree	This site contains a tree which was required by a condition of subdivision. This tree is protected. If you are propose to remove the tree, the agreement of council is required and early consultation with council subdivision staff is recommended.Species Name: Tilia x vulgaris (Common Lime) Crown Width (m): 11.00 Height (m): 18.00
Protected Tree	This site contains a tree which was required by a condition of subdivision. This tree is protected. If you are propose to remove the tree, the agreement of council is required and early consultation with council subdivision staff is recommended.Species Name: Tilia x vulgaris (Common Lime) Crown Width (m): 13.00 Height (m): 11.00
Protected Tree	This site contains a tree which was required by a condition of subdivision. This tree is protected. If you are propose to remove the tree, the agreement of council is required and early consultation with council subdivision staff is recommended.Species Name: Tilia x vulgaris (Common Lime) Crown Width (m): 18.00 Height (m): 15.00
Protected Tree	This site contains a tree which was required by a condition of subdivision. This tree is protected. If you are propose to remove the tree, the agreement of council is required and early consultation with council subdivision staff is recommended.Species Name: Ulmus glabra 'Lutescens' (Golden Elm) Crown Width (m): 13.00 Height (m): 12.00
Protected Tree	This site contains a tree which was required by a condition of subdivision. This tree is protected. If you are propose to remove the tree, the agreement of council is required and early consultation with council subdivision staff is recommended.Species Name: Ulmus minor 'Variegata' (Variegated Smooth-leaved Elm) Crown Width (m): 11.00 Height (m): 19.00

Right of Way

The right of way over the adjacent driveway associated with proposed lot 3 is to be maintained in order to maintain ongoing access to the proposed Lot 2 containing the heritage building.

Health of Land

In the event that soils are found to have visible staining, odours and/or other conditions that indicate soil contamination, then work must cease until a Suitably Qualified and Experienced Practitioner (SQEP) engaged by the consent holder has assessed the matter and advised of the appropriate remediation and/or disposal options for these soils. The consent holder shall immediately notify the Council Attention: Team Leader Environmental Health, by way of email to EnvResourceMonitoring@ccc.govt.nz. Any measures to manage the risk from potential soil contamination shall also be communicated to the Council prior to work re-commencing.

Heritage

Any planting over raingarden 3 must be in compliance with ECan consent requirements.

The applicant should not commence or should cease work on a given area if the works proposed in that area change from those in the approved consent document. Any variation should be discussed with the Christchurch City Council's Heritage Team Leader or nominee, who in consultation with Council's Resource Consents Unit will determine an appropriate consenting response. Five working days should be allowed for this process. Failure to discuss changes with the Council's Heritage Team or a Resource Consents Planner may

constitute a breach of the conditions of this consent. Amended plans and information showing these changes, including any associated changes to the Temporary Protection Plan, may be required to be submitted to the Heritage Team Leader, Christchurch City Council (or nominee) for certification prior to work on that area commencing or resuming.

Information being submitted in relation to conditions of this consent is to be sent by email to: rcmon@ccc.govt.nz. The current nominated Heritage team contact for this consent is Amanda Ohs, ph. 9418292 or email: amanda.ohs@ccc.govt.nz, or heritage@ccc.govt.nz.

The intention of the photographic record condition is to maintain a record of the works with a focus on the areas undergoing change rather than individual elements. The same camera positions should be used for all photo sets before, during and after the works to enable comparison. Photographs should be of printable quality, at least 1440 pixels by 960 pixels for a 4"x 6" print at a minimum resolution of 240 PPI. They should be labelled with the position on site or in relation to the site, date and photographer's name, and submitted as individual image files, with a plan showing photograph locations. Photos should be submitted to the Council's nominated Heritage team contact electronically, either by email (noting that Council's email data transfer limit is 20MB per email), or via a file transfer website such as wettransfer.com or dropbox.com to rcmon@ccc.govt.nz.

There may be archaeology on this site as protected under the Heritage New Zealand Pouhere Taonga Act 2014. Archaeological sites are defined in the Act as any place where there is physical evidence of pre-1900 occupation, regardless of whether the site is known or recorded or not. Authority from Heritage New Zealand Pouhere Taonga is required for any work that affects or may affect an archaeological site. **Please contact the HNZPT regional archaeologist: archaeologistcw@heritage.org.nz or 03 363 1880 before commencing any work on the land.** For more information visit <http://archaeology.nz>


Reported and recommended by: Angela O'Reilly, Subdivision Planner

Date: 30th March 2023

Decision

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

Delegated officer:



Rachel Cottam
Senior Planner
30/03/2023 12:03 pm

Memorandum of Easement

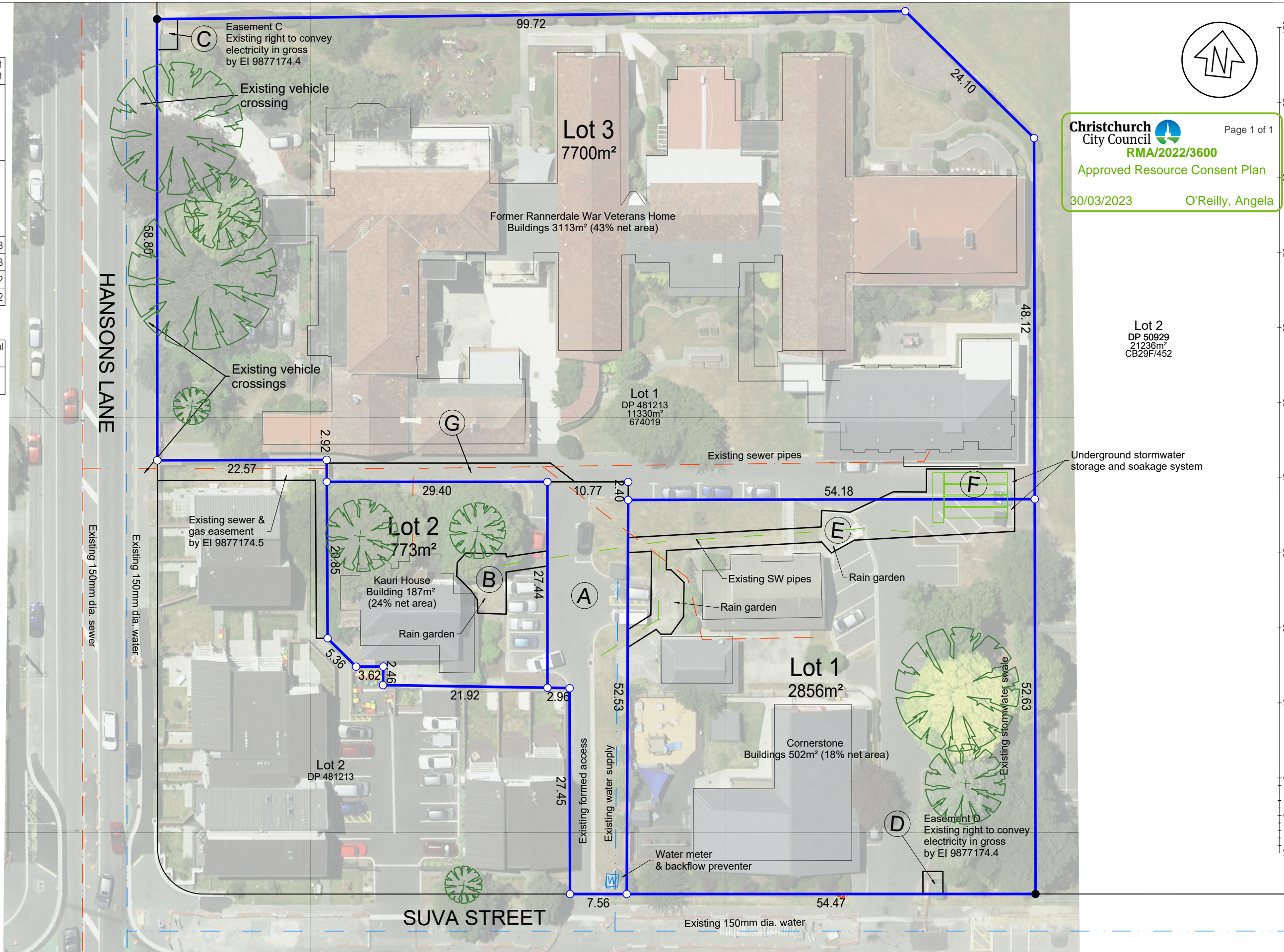
Nature	Servient Tenement		Dominant Tenement
	Lot	Shown As	
Right of way, Right to convey water, electric power & telecommunications, Right to drain water & sewage	Lot 3	A	Lot 2
Right to convey water, electric power & telecommunications, Right to drain water & sewage	Lot 3	A	Lot 1
Right to drain water	Lot 2	B	Lots 1 & 3
	Lot 1	E	Lots 2 & 3
	Lot 3	F	Lots 1 & 2
Right to drain sewer	Lot 3	G	Lots 1 & 2

Schedule of Existing Easements

Nature	Servient Tenement		Document
	Lot	Shown As	
Right to convey electricity in gross	Lot 3	C	ORION NZ Ltd
	Lot 1	D	

Notes:
Areas and dimensions are subject to survey and LINZ approval.
Further easements may be required.

The trees shown are Protected Trees.
Further details are given on Consent Notice 9877174.6



Christchurch City Council

RMA/2022/3600

Approved Resource Consent Plan

30/03/2023

O'Reilly, Angela

Page 1 of 1

ACCESS
land surveying ltd

Registered Professional and Licensed Cadastral Surveyors
MNZIS Member of Consulting Surveyors NZ
access@landsurveying.co.nz
p: 03 335 0329
m: 0274 987 240

Notes:

Lots 1 - 3 Being Proposed Subdivision of Lot 1 DP 481213

Issue Details		
Rev.	Description	Date
A	For information	21/11/2022

Date: 21/11/2022	CT ref: 674019	A3 Sheet
Surveyed: LS	Total area: 11330m²	
Drawn: LS	Client: The Christian Schools Trust	Revision A
Checked: RV	Scale 1:500	Sheet: 1 of 1
Local Authority: Christchurch City Council		Ref: 3802

Our proposed Heritage Plan Change (PC13)

Submitter Details


Submission Date: 11/05/2023

First name: Anita

Last name: Collie

On behalf of: Mitre Hotel Holdings Limited

Attached Documents

Name	
Mitre Hotel Plan Change 13 Submission - FINAL	

Form 5

Submission on notified proposal for policy statement or plan, change or variation

Clause 6 of Schedule 1, Resource Management Act 1991

To: **Christchurch City Council**

Name of Submitter: **Mitre Hotel Holdings Limited**

Introduction

1. The Christchurch City Council (**Council**) have publicly notified Plan Change 13 (**PC13**) to the Christchurch District Plan (**District Plan**) to introduce eleven new residential heritage areas across the Christchurch City for protection in the District Plan and adding around 60 buildings, items and building interiors to the Schedule of Significant Historic Heritage.
2. This is a submission on PC13 to the Christchurch District Plan made by Mitre Hotel Holdings Limited (**the submitter**).
3. The submitter owns the property legally described as Part Section 9 TN OF Lyttelton as held within the Record of Title CB500/2, located at 40 Norwich Quay, Lyttelton (**the Site**).
4. A heritage building "Mitre Hotel" is located on the property and the surrounding land is subject to a heritage setting overlay. The submitter is directly affected by PC13.
5. The property is located within the Commercial Banks Peninsula Zone under the operative District Plan (**District Plan**) and this zoning is retained under Plan Change 14 (**PC14**).

Specific provisions of the plan change that this submission relates to

6. The submitter has an interest in the plan change as a whole and is therefore this submission relates to all provisions of PC13. The submitter has a particular interest in all matters that affect the submitter's property.

Submission

7. The submitter **opposes** the proposed plan change as notified:
 - (a) The protection of historic heritage from inappropriate subdivision, use, and development is a matter of national importance that is required to be recognised and provided for – section 6(f) of the Resource Management Act 1991.
 - (b) PC13 as notified is unreasonable in its coverage of the submitter's property against the backdrop of section 6(f) and affords

protection to a building that no longer warrants protection as historic heritage.

- (c) The derelict building on the site was extensively damaged by the 2010–2012 Canterbury earthquakes and has been vandalised thereafter to the point that it is in disrepair. In particular, the February 2011 earthquake caused substantial structural damage to the Mitre Hotel. The west concrete wall bowed out approximately 30cm, and the facades tilted towards to the road. Chimneys and fireplaces were destroyed, and extensive damage occurred to laths and plaster walls and ceilings. The June 2011 Earthquake caused further substantial damage. The last earthquake to cause significant additional damage occurred in December 2011.
 - (d) In 2013 sewage flowed through the building for several weeks caused by Council contractors blocking street sewers during earthquake repairs on Norwich Quay. This caused considerable damage to flooring, doors, and architraves. Rainwater has been penetrating the building in the recent years due to perished spouting and internal gutters that were programmed for replacement in 2011. Rainwater is now also entering the building via damaged flashings along the facades, and demolished chimneys and roof penetrations from large steel tie cables. This has caused considerable rot and decay over the last 5 years.
 - (e) The submitter has sought advice and support from community and Council heritage advocacy organisations, where there has been a lack of interest in the retention of the Mitre Hotel. The submitters application for a heritage grant was refused.
 - (f) The submitter has undertaken extensive due diligence on repair options and it has become clear that the Mitre Hotel is beyond repair and the likelihood of demolition irrefusable. The heritage values of the building are substantially reduced and therefore the removal of the heritage listing is the most appropriate planning outcome.
 - (g) Removal of the heritage listing will enable the submitter to commence redevelopment of the site, contributing to the recovery of Lyttelton.
 - (h) The risks of not acting (i.e. not removing the heritage listing) means that the derelict building will remain on site. Resource consent costs are prohibitive for demolition and removing the listing will enable a more efficient use of the land resource, while not detracting from values afforded protection under section 6(f) of the Resource Management Act 1991 (**RMA**).
8. Amending PC13 as notified will:
- (a) finally enable earthquake recovery to proceed in relation to the site.
 - (b) enable a more efficient use of land by facilitating redevelopment of a key development site in Lyttelton.

- (c) meet the reasonably foreseeable needs of future generations.
- (d) represent the most appropriate means of exercising the Council's functions, having regard to the efficiency and effectiveness of the provisions relative to other means.
- (e) give effect to the National Policy Statement for Urban Development 2021 (**NPS-UD**) and Canterbury Regional Policy Statement.
- (f) Promote the sustainable management of natural and physical resources, will be consistent with Part 2 of the Resource Management Act 1991 and ultimately achieve its purpose.

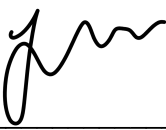
Relief Sought

9. The submitter seeks the following relief:
- (a) the deletion of heritage item 1060 Mitre Hotel and Setting – 40 Norwich Quay, Lyttelton from the District Plan through Plan Change 13.
 - (b) any other additional or consequential relief to the District Plan, including but not limited to, the maps, issues, objectives, policies, rules, controls/discretions, assessment criteria and explanations that will fully give effect to the matters raised in this submission and the relevant planning legislation.

Other

10. The submitter could not gain an advantage in trade competition through this submission.
11. The submitter wishes to be heard in support of this submission.
12. If others make similar submissions, the submitter will consider presenting a joint case at any hearing.

DATED 10 May 2023

pp.  _____

Mitre Hotel Holdings Limited

Address for Service: Town Planning Group
PO Box 35
Christchurch 8014

Contact Person:	Anita Collie
Cell:	021 568 335
E-mail:	anita@townplanning.co.nz

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date:	11/05/2023		
First name:	Glenda	Last name:	Dixon
Organisation:	Christchurch City Council		
On behalf of:	Christchurch City Council		

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:

Change wording to '~~These~~ Heritage Area rules do not apply to the Akaroa Township Heritage Area (HA1)..'

My submission is that:

9.3.3 How to interpret and apply the rules

New clause g (previously clause e) is proposed to be changed by the addition of the sentence, 'These rules do not apply to the Akaroa Township Heritage Area (HA1)...'. This implies that all rules relating to heritage, including those applying to heritage items and settings, do not apply in this area. It should only be about Heritage Area rules not applying.

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:

Insert in PC13 District Plan text amendments (rules package), Appendices 13.2.6.1 and 13.2.6.2 , adding cross references to Appendix 9.3.7.2 in the listings for Linwood, Sydenham, and Akaroa French cemeteries.

My submission is that:

App 13.2.6.1 and App 13.2.6.2

These appendices with cross-references inserted have been included in the PC14 version of the chapter but not in the PC13 version. These should match.

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:

In App 15.15.7, c.iv. Replace 'Design and Appearance Committee' with 'Design Review Panel'. In Matter of Discretion 9.3.6.3 replace 'Akaroa Design and Appearance Advisory Committee' with 'Akaroa Design Panel'.

My submission is that:

App 15.15.7 & 9.3.6.3 MOD

Incorrect name for Akaroa Design Panel

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date:	12/05/2023		
First name:	Ainsley	Last name:	McLeod
Organisation:	The Canterbury Jockey Club		
On behalf of:	The Canterbury Jockey Club		

Consultation Document Submissions

Provision: Chapter 9 Natural and Cultural Heritage

Seek Amendment

I seek the following decision from the Council

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

My submission is that:

Detailed submission in the attachment.

1. Retain the deletion of Heritage Item 453 from Appendix 9.3.7.2 Schedule of Significant Historic Heritage Items as notified.
2. Retain the updated Statement of Significance ' Christchurch District Plan- Scheduled Heritage Place Heritage Assessment- Statement of significant Heritage Item Number 452 Riccarton Racecourse Tea House and Setting- 165 Racecourse Road, Christchurch' as notified (or revise to better reflect the content of this submission).

Provision: Planning Maps

Seek Amendment


I seek the following decision from the Council

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

My submission is that:

3. Retain the deletion of Heritage Setting 183 from the Heritage Items and Settings Aerial Maps and Natural and Cultural Heritage Planning Map 30C as notified.
4. Amend Heritage Setting 684 as shown on the Heritage Items and Settings Aerial Maps and Natural and Cultural Heritage Planning Map 30C as shown in Figure 1 (attached).
5. Such further, alternative or consequential relief as may be necessary to fully give effect to this submission.

Attached Documents

Name
Canterbury Jockey Club Submission on Proposed Plan Change 13 (final) 

Form 5

Submission on notified proposal for policy statement or plan, change or variation

Clause 6 of Schedule 1, Resource Management Act 1991

To the Christchurch City Council (“the Council”)

Name of submitter: Canterbury Jockey Club

This is a submission on a change proposed to the following plan (“the proposal”):

Proposed Heritage Plan Change (“proposed Plan Change 13”) to the operative Christchurch District Plan (“District Plan”).

The Canterbury Jockey Club could not gain an advantage in trade competition through this submission.

The specific provisions of the proposal that my submission relates to are:

- Appendix 9.3.7.2 Schedule of Significant Historic Heritage Items;
- updated Statement of Significance ‘Christchurch District Plan – Scheduled Heritage Place Heritage Assessment – Statement of Significance Heritage Item Number 452 Riccarton Racecourse Tea House and Setting – 165 Racecourse Road, Christchurch’;
- proposed Heritage Items and Settings Aerial Maps (Heritage Setting Number 684); and
- Natural and Cultural Heritage Planning Map 30C.

The Canterbury Jockey Club’s submission is:

Background: The Riccarton Park Racecourse and Canterbury Jockey Club

The Canterbury Jockey Club was established in 1854 and held its first meeting in Hagley Park at Easter of the following year. By January 1857 the club was holding its third meeting at its new course, the current site, in Upper Riccarton. The Riccarton Park Racecourse has been used continuously used for racing since this time. The Canterbury Jockey Club has had the oldest continuous existence of any horse racing club in the country.

The racecourse at Upper Riccarton was reserved as a public recreation ground by the Canterbury Provincial Council in 1858 and thereafter leased to the Jockey Club. Riccarton Park Racecourse became the home of the New Zealand Cup in 1867 and the course’s Cup and Show Week each November is one of Canterbury’s premier events.

The Riccarton Park Racecourse is held and administered under the Riccarton Racecourse Act 2016 by the Trustees of the Christchurch Racecourse whose power and authorities in respect of the site are set out in that legislation.

The Canterbury Jockey Club is responsible for the day-to-day development, operation and maintenance of the facilities at Riccarton Park Racecourse, including race days, events and the leasing and management of training facilities.

Apart from the racecourse itself, a number of buildings and spaces, have developed within the racecourse site over time, including the public grandstand, tea house, members stand, storage

sheds, stables/tie-ups and established gardens and significant trees. The Riccarton market is also established on the site.

The District Plan includes the following in the Appendix 9.3.7.2 Schedule of Significant Historic Heritage Items:

- Riccarton Racecourse Tea House and Setting (Heritage Item Number 452 and Heritage Setting Number 183); and
- Riccarton Racecourse Public Grandstand and Setting (Heritage Item Number 453 and Heritage Setting Number 183).

The tea house is also registered under the Heritage New Zealand Pouhere Taonga Act 2014 (“HNZPT”) as a Category 2 Historic Place (List Number 5330).

In October 2022, the Council granted resource consent to demolish the Grand National Stand at Riccarton Racecourse. The demolition of the grandstand has now commenced.

Proposed Plan Change 13 responds to the demolition of the grandstand by:

- deleting Heritage Item 453 from Appendix 9.3.7.2 Schedule of Significant Historic Heritage Items;
- reducing the area subject to a heritage setting notation by replacing Heritage Setting Number 183 with a new Heritage Setting number 684 (shown on the Proposed Heritage Items and Settings Aerial Maps);
- updating the Statement of Significance ‘Christchurch District Plan – Scheduled Heritage Place Heritage Assessment – Statement of Significance Heritage Item Number 452 Riccarton Racecourse Tea House and Setting – 165 Racecourse Road, Christchurch’; and
- revising Natural and Cultural Heritage Planning Map 30C to reflect the area subject to Heritage Setting number 684.

Statutory Context

The Section 32 Evaluation that accompanies proposed Plan Change 13 describes Council’s legal obligations and the related statutory and strategic planning documents. This includes Council’s obligations directed by section 6, 7, 31, 74 and 75 of the RMA and the provisions of the Canterbury Regional Policy Statement (“CRPS”); the objectives and policies of the District Plan; and the Council’s ‘Our Heritage, Our Taonga Heritage Strategy (2019 – 2029)’. Canterbury Jockey Club’s submission is made with cognisance of this statutory context.

Canterbury Jockey Club’s submission

Canterbury Jockey Club recognises that, amongst other matters, proposed Plan Change 13 seeks to delete the ‘Riccarton Racecourse Public Grandstand and Setting’ listing as a Significant Historic Heritage Item in Appendix 9.3.7.2 and, consequently, revise the ‘Riccarton Racecourse Tea House and Setting’ listing in the District Plan.

Given the demolition of the public grandstand, Canterbury Jockey Club supports the deletion of the listing of this building in Appendix 9.3.7.2 and seeks that the deletion be retained as notified. Canterbury Jockey Club similarly generally supports the revision of the ‘Statement of Significance’ so

that this statement relates to the tea house and its setting and not the setting of the public grandstand.

Further, Canterbury Jockey Club supports the retention of the HNZPT listed tea house as a scheduled heritage item in the District Plan.

In respect of proposed Heritage Setting 684, Canterbury Jockey Club supports the proposed reduction in the area subject to a Heritage Setting notation, when compared to the current Heritage Setting 183. However, Canterbury Jockey Club does not support the extent of proposed Heritage Setting 684 that is shown on the Proposed Heritage Items and Settings Aerial Maps and Natural and Cultural Heritage Planning Map 30C.

Canterbury Jockey Club seeks that the area subject to the Heritage Setting 684 notation is further reduced to more accurately reflect the area that provides the context and setting for the tea house by including the landscaped area and moat in the 'setting', which are intrinsic to the Tea Rooms building and its historical context, but to exclude areas that have no heritage relationship to the tea rooms building and surrounds.

Figure 1 illustrates the area that Canterbury Jockey Club supports being included in Heritage Setting 684.

Figure 1: Revised Area of Heritage Setting 684 (shown in red)



The area that Canterbury Jockey Club seeks is excluded from the Heritage Setting does not reflect the historical context of the tea house and garden area. These areas are not mentioned in the

Statement of Significance and have no functional, visual, contextual or heritage connection to the tea house building and surrounds. For instance, the strip of trees to the south of the site that is included within the proposed Heritage Setting is:

- is an area used for horse truck parking during racedays;
- is visually separated by horse stabling and tie-up buildings; and
- is physically separated from the tea house and the tea house, and other parts of the site, are not accessed through this area.

In this regard, it is acknowledged that notable trees on the site are protected in accordance with Appendix 9.4.7.1 and Chapter 9.4 of the District Plan and, as such, the Heritage Setting is not necessary to achieve the protection of these trees. It is considered that the protection of these trees under Chapter 9.4 of the District Plan would be satisfactory and appropriate and further proposed provisions within Chapter 9.3 of the District Plan would be onerous and unnecessary.

Other elements of the racecourse that are proposed to be included in revised Heritage Setting 684 include pedestrian pathways, parking areas, structures associated with the Riccarton market and vehicle accessways. These spaces and access areas are not considered to reflect the historical context of the tea house building and setting. This has been accepted in the context of a recent resource consent that was granted for a storage shed within the existing Heritage Setting (RMA/2022/3300) where the decision stated:

“The shed is 84m south west of the Tea House at its closest point. There is considerable mature vegetation around the Tea House and between the two structures, including a number of scheduled trees. The applicant considers that the shed will not be visible from the Tea House because of the vegetation, and additionally that its recessive colour will make it less conspicuous within the setting. Noting that many of these trees are deciduous and therefore that their capacity to screen the shed from the Tea House will be less during winter, I otherwise agree with this assessment. No assessment of the impact of the shed on the Grandstand has been provided. In view of the impending demolition, this is acceptable. ...

Given the distance of the shed from the Tea House and the lack of visibility between the two buildings, I recommend that the effects of the proposed new building on the heritage values of the Riccarton Racecourse Tea House and its setting is less than minor.”

Acknowledging this conclusion, Canterbury Jockey Club’s submission seeks that the mature vegetation is the natural boundary for the heritage setting. This vegetation is shown on the following photographs 1 to 6.

Canterbury Jockey Club welcomes the opportunity to meet with Council representatives on-site to further consider the appropriate location for the Heritage Setting boundary at any time that is convenient.



Photo 1: View looking north to the Tea House



Photo 2: View of rear of Tea House building looking west



Photo 3: The Tea House entrance



Photo 4: The Tea House view from front lawn



Photo 5: The Tea House view from front lawn



Photo 6: The Tea House view from front lawn

It is Canterbury Jockey Clubs conclusion that reducing the area of Heritage Setting 684 as sought is the most efficient, effective and appropriate means to give effect to the relevant statutory provisions and, as such, achieve the purpose of the RMA.

The Canterbury Jockey Club seeks the following decision from the local authority:

1. retain the deletion of Heritage Item 453 from Appendix 9.3.7.2 Schedule of Significant Historic Heritage Items as notified;
2. retain the updated Statement of Significance 'Christchurch District Plan – Scheduled Heritage Place Heritage Assessment – Statement of Significance Heritage Item Number 452 Riccarton Racecourse Tea House and Setting – 165 Racecourse Road, Christchurch' as notified (or revise to better reflect the content of this submission);
3. retain the deletion of Heritage Setting 183 from the Heritage Items and Settings Aerial Maps and Natural and Cultural Heritage Planning Map 30C as notified;
4. amend Heritage Setting 684 as shown on the Heritage Items and Settings Aerial Maps and Natural and Cultural Heritage Planning Map 30C as shown in Figure 1.
5. Such further, alternative or consequential relief as may be necessary to fully give effect to this submission.

The Canterbury Jockey Club wishes to be heard in support of its submission.

Due to the specific interests of the Canterbury Jockey Club, and particularly the heritage significance of the Riccarton Racecourse, the Canterbury Jockey Club will not consider presenting a joint case.



**Signature of person authorised to sign
on behalf of the Canterbury Jockey Club**

Date: 12 May 2023

Electronic address for service: ainsley@amconsulting.co.nz

Telephone: +64 27 215 0600


Postal address: 8 Aikmans Road, Merivale, Christchurch 8014

Contact person: Ainsley McLeod

Our proposed Heritage Plan Change (PC13)

[Submitter Details](#)**Submission Date:** 12/05/2023**First name:** Elizabeth**Last name:** Harris


Attached Documents

Name
Wigram Lodge - Plan Change 13 Submission - FINAL 

Our proposed Heritage Plan Change (PC13)

[Submitter Details](#)**Submission Date:** 12/05/2023**First name:** Elizabeth**Last name:** Harris

Attached Documents

Name	
Wigram Lodge - Plan Change 13 Submission - FINAL	

Form 5

Submission on notified proposal for policy statement or plan, change or variation

Clause 6 of Schedule 1, Resource Management Act 1991

To: **Christchurch City Council**

Name of Submitter: **Elizabeth Harris and John Harris**

Background

1. The Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (**Amendment Act**) requires the Christchurch City Council (**Council**) to include Medium Density Residential Standards (**MDRS**) and to give effect to the National Policy Statement on Urban Development 2020 (**NPS-UD**) in its District Plan. The Council has sought to give effect to this requirement through the notification of Plan Change 14 - Housing and Business Choice (**PC14**) and Plan Change 13 - Heritage (**PC13**).
2. With respect to residential zones, the Amendment Act requires that:
 - (a) every residential zone in an urban environment of a specified territorial authority must give effect to policy 3 of the NPS-UD in that zone; and
 - (b) a territorial authority may create new residential zones or amend existing residential zones.
3. With respect to non-residential zones, the Amendment Act further requires that:
 - (a) the territorial authority must ensure that the provisions in its district plan for each urban non-residential zone within the authority's urban environment give effect to the changes required by policy 3 of the NPS-UD; and
 - (b) a territorial authority may create new urban non-residential zones or amend existing urban non-residential zones.
4. The public notice states that the changes proposed for PC14 are "extensive" and include:
 - (a) increasing height limits in and around the central city, and in suburban centres;
 - (b) changes to rules within commercial zones to ensure high quality urban environments and be more enabling of activities without the need for resource consent;

- (c) medium and high density residential zones with new rules are being introduced across all urban residential areas;
- (d) rezoning of industrial areas near the central city for housing and mixed-use activities;
- (e) introducing qualifying matters to reduce the scale and density of buildings enabled by the MDRS and NPS-UD is reduced; and
- (f) amending objectives, policies, and other provisions throughout the District Plan.

Introduction

- 5. This is a submission on PC13 and PC14 to the Christchurch District Plan made by Elizabeth Harris and John Harris (**the submitter**).
- 6. The submitter owns the property legally described as Section 456 TN of Christchurch as held within the Record of Title 3441868, located at 31 Cashel Street (**the site**).
- 7. The property is located within the Residential Central City Zone under the operative District Plan and is proposed to be Medium Density Residential zone and within the Inner City West Residential Heritage Area under Plan Change 14.

Specific provisions of the plan change that this submission relates to

- 8. The submitter has an interest in the plan changes as a whole and is therefore this submission relates to all provisions of PC13 and PC14. The submitter has a particular interest in all matters that affect the submitters property.

Submission

- 9. The submitter both **supports** and **opposes** the plan change as notified. More specifically:
 - (a) The submitter supports the intensification of urban form to provide for additional development capacity, particularly near the city and commercial centres, and supports any provisions or changes to the District Plan that will achieve this outcome; and
 - (b) The submitter opposes any provisions or changes that will adversely affect the outcome in (a);
 - (c) The submitter requests that the Inner City West Residential Heritage Area overlay is removed from the submitter's property and other properties on Cashel Street; and
 - (d) The submitter requests that its property and other properties on Cashel Street are rezoned to High Density Residential, better reflecting the site context within the Central City and better giving effect to the NPS-UD.
- 10. The protection of historic heritage from inappropriate subdivision, use, and development is a matter of national importance that is required to be

recognised and provided for – section 6(f) of the Resource Management Act 1991.

11. PC13 and PC14 as notified is unreasonable in their coverage of the submitter's property against the backdrop of section 6(f) and affords protection to a number of buildings that do not warrant protection as historic heritage.
12. The flats located on 31 Cashel Street are not a heritage listed building and are not identified as a heritage building within the District Plan. Existing heritage listings sufficiently protect buildings which have meet the criteria for the assessment of significance of heritage values.
13. The Residential Heritage Area overlay unnecessarily complicates any future work on the building and the grounds in the future. The Submitter has long-term plans to redevelop the site, contributing to housing supply in the Inner City.
14. Directly across Cashel Street is High Density Residential with no heritage qualifying matters which could see buildings up to 32m (10 storeys) high. The zoning difference for the two sides of Cashel Street will create a significant disparity in development outcomes and character on Cashel Street.
15. Policy 3 of the NPS-UD is of direct relevance, whereby at sub clause (a) it directs that the district plan is to enable building heights and density of urban form to realise as much *development capacity* as possible, to maximise benefits of intensification in city centre zones.
16. Cashel Street is located in proximity to a centre zone with many employment opportunities, is well serviced by public transport and in an area where there is predicted to be high demand for housing. It is ideally situated to be redeveloped to provide for additional housing, enabling more people to live in the Christchurch urban environment.
17. An appropriate outcome for the submitter's property and other properties n Cashel Street would be to provide for more intense residential development, enabling greater building heights and densities.
18. Rezoning the site to High Density Residential and removing the Inner City West Residential Heritage Area overlay, along with commensurate changes to the District Plan to provide for this submission and give effect to the NPS-UD will:
 - (a) enable more people to live in an urban environment that is near a centre zone and is well-serviced by public transport;
 - (b) contribute to the social and economic well-being of communities and meet the reasonably foreseeable needs of future generations;
 - (c) represent the most appropriate means of exercising the Council's functions, having regard to the efficiency and effectiveness of the provisions relative to other means.
 - (d) give effect to the NPS-UD and Canterbury Regional Policy Statement.

- (e) promote the sustainable management of natural and physical resources, will be consistent with Part 2 of the Resource Management Act 1991 and ultimately achieve its purpose.


Relief Sought

- 19. The submitter seeks the following relief:
 - (a) the submitters site and surrounding sites be rezoned to High Density Residential;
 - (b) remove the Inner City West Residential Heritage Area overlay from the site and other sites on Cashel Street;
 - (c) any other additional or consequential relief to the District Plan, including but not limited to, the maps, issues, objectives, policies, rules, controls/discretions, assessment criteria and explanations that will fully give effect to the matters raised in this submission and the relevant planning legislation.

Other

- 20. The submitter could not gain an advantage in trade competition through this submission.
- 21. The submitter wishes to be heard in support of this submission.
- 22. If others make similar submissions, the submitter will consider presenting a joint case at any hearing.

DATED 12 May 2023

pp.  _____

Elizabeth & John Harris

Address for Service: Town Planning Group
PO Box 35
Christchurch 8014

Contact Person: Sam Kealey
Cell: 021 057 3762
E-mail: sam@townplanning.co.nz

Form 5

Submission on notified proposal for policy statement or plan, change or variation

Clause 6 of Schedule 1, Resource Management Act 1991

To: **Christchurch City Council**

Name of Submitter: **Elizabeth Harris and John Harris**

Background

1. The Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (**Amendment Act**) requires the Christchurch City Council (**Council**) to include Medium Density Residential Standards (**MDRS**) and to give effect to the National Policy Statement on Urban Development 2020 (**NPS-UD**) in its District Plan. The Council has sought to give effect to this requirement through the notification of Plan Change 14 - Housing and Business Choice (**PC14**) and Plan Change 13 - Heritage (**PC13**).
2. With respect to residential zones, the Amendment Act requires that:
 - (a) every residential zone in an urban environment of a specified territorial authority must give effect to policy 3 of the NPS-UD in that zone; and
 - (b) a territorial authority may create new residential zones or amend existing residential zones.
3. With respect to non-residential zones, the Amendment Act further requires that:
 - (a) the territorial authority must ensure that the provisions in its district plan for each urban non-residential zone within the authority's urban environment give effect to the changes required by policy 3 of the NPS-UD; and
 - (b) a territorial authority may create new urban non-residential zones or amend existing urban non-residential zones.
4. The public notice states that the changes proposed for PC14 are "extensive" and include:
 - (a) increasing height limits in and around the central city, and in suburban centres;
 - (b) changes to rules within commercial zones to ensure high quality urban environments and be more enabling of activities without the need for resource consent;

- (c) medium and high density residential zones with new rules are being introduced across all urban residential areas;
- (d) rezoning of industrial areas near the central city for housing and mixed-use activities;
- (e) introducing qualifying matters to reduce the scale and density of buildings enabled by the MDRS and NPS-UD is reduced; and
- (f) amending objectives, policies, and other provisions throughout the District Plan.

Introduction

- 5. This is a submission on PC13 and PC14 to the Christchurch District Plan made by Elizabeth Harris and John Harris (**the submitter**).
- 6. The submitter owns the property legally described as Section 456 TN of Christchurch as held within the Record of Title 3441868, located at 31 Cashel Street (**the site**).
- 7. The property is located within the Residential Central City Zone under the operative District Plan and is proposed to be Medium Density Residential zone and within the Inner City West Residential Heritage Area under Plan Change 14.

Specific provisions of the plan change that this submission relates to

- 8. The submitter has an interest in the plan changes as a whole and is therefore this submission relates to all provisions of PC13 and PC14. The submitter has a particular interest in all matters that affect the submitters property.

Submission

- 9. The submitter both **supports** and **opposes** the plan change as notified. More specifically:
 - (a) The submitter supports the intensification of urban form to provide for additional development capacity, particularly near the city and commercial centres, and supports any provisions or changes to the District Plan that will achieve this outcome; and
 - (b) The submitter opposes any provisions or changes that will adversely affect the outcome in (a);
 - (c) The submitter requests that the Inner City West Residential Heritage Area overlay is removed from the submitter's property and other properties on Cashel Street; and
 - (d) The submitter requests that its property and other properties on Cashel Street are rezoned to High Density Residential, better reflecting the site context within the Central City and better giving effect to the NPS-UD.
- 10. The protection of historic heritage from inappropriate subdivision, use, and development is a matter of national importance that is required to be

recognised and provided for – section 6(f) of the Resource Management Act 1991.

11. PC13 and PC14 as notified is unreasonable in their coverage of the submitter's property against the backdrop of section 6(f) and affords protection to a number of buildings that do not warrant protection as historic heritage.
12. The flats located on 31 Cashel Street are not a heritage listed building and are not identified as a heritage building within the District Plan. Existing heritage listings sufficiently protect buildings which have meet the criteria for the assessment of significance of heritage values.
13. The Residential Heritage Area overlay unnecessarily complicates any future work on the building and the grounds in the future. The Submitter has long-term plans to redevelop the site, contributing to housing supply in the Inner City.
14. Directly across Cashel Street is High Density Residential with no heritage qualifying matters which could see buildings up to 32m (10 storeys) high. The zoning difference for the two sides of Cashel Street will create a significant disparity in development outcomes and character on Cashel Street.
15. Policy 3 of the NPS-UD is of direct relevance, whereby at sub clause (a) it directs that the district plan is to enable building heights and density of urban form to realise as much *development capacity* as possible, to maximise benefits of intensification in city centre zones.
16. Cashel Street is located in proximity to a centre zone with many employment opportunities, is well serviced by public transport and in an area where there is predicted to be high demand for housing. It is ideally situated to be redeveloped to provide for additional housing, enabling more people to live in the Christchurch urban environment.
17. An appropriate outcome for the submitter's property and other properties n Cashel Street would be to provide for more intense residential development, enabling greater building heights and densities.
18. Rezoning the site to High Density Residential and removing the Inner City West Residential Heritage Area overlay, along with commensurate changes to the District Plan to provide for this submission and give effect to the NPS-UD will:
 - (a) enable more people to live in an urban environment that is near a centre zone and is well-serviced by public transport;
 - (b) contribute to the social and economic well-being of communities and meet the reasonably foreseeable needs of future generations;
 - (c) represent the most appropriate means of exercising the Council's functions, having regard to the efficiency and effectiveness of the provisions relative to other means.
 - (d) give effect to the NPS-UD and Canterbury Regional Policy Statement.

- (e) promote the sustainable management of natural and physical resources, will be consistent with Part 2 of the Resource Management Act 1991 and ultimately achieve its purpose.


Relief Sought

- 19. The submitter seeks the following relief:
 - (a) the submitters site and surrounding sites be rezoned to High Density Residential;
 - (b) remove the Inner City West Residential Heritage Area overlay from the site and other sites on Cashel Street;
 - (c) any other additional or consequential relief to the District Plan, including but not limited to, the maps, issues, objectives, policies, rules, controls/discretions, assessment criteria and explanations that will fully give effect to the matters raised in this submission and the relevant planning legislation.

Other

- 20. The submitter could not gain an advantage in trade competition through this submission.
- 21. The submitter wishes to be heard in support of this submission.
- 22. If others make similar submissions, the submitter will consider presenting a joint case at any hearing.

DATED 12 May 2023

pp.  _____

Elizabeth & John Harris

Address for Service: Town Planning Group
PO Box 35
Christchurch 8014

Contact Person: Sam Kealey
Cell: 021 057 3762
E-mail: sam@townplanning.co.nz

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 12/05/2023

First name: Alice

Last name: Burnett

On behalf of: Hughes Developments Limited

Consultation Document Submissions

Provision: Chapter 9 Natural and Cultural Heritage

Seek Amendment

I seek the following decision from the Council


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

see attached

My submission is that:

see attached

Attached Documents

Name	
Submission to PC13 HDL	

SUBMISSION ON THE PROPOSED PLAN CHANGE 14, CHRISTCHURCH DISTRICT PLAN*in accordance with Clause 6 of the Schedule 1 of the Resource Management Act 1991*

TO: Christchurch City Council
engagement@ccc.govt.nz

1. Submitter Details

Submitters name: Hughes Developments Limited

Address For Service: c/- Davie Lovell Smith Ltd
 PO Box 679, Christchurch 8140

Contact person: alice.burnett@dls.co.nz

Phone: 03-379-0793

2. Trade Competition:

We could gain an advantage in trade competition through this submission: ☐ Yes ☒ No

If Yes to above, then:

We are directly affected by an effect of the subject matter of the submissions that:

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition ☐ Yes ☒ No

3. Hearing options:

Do you wish to be heard in support of your submission? *If you choose yes, you can choose not to speak when the hearing date is advertised.*

☒ Yes ☐ No

If others are making a similar submission would you consider presenting a joint case with them at the hearing? *You can change your mind once the hearing has been advertised.*

☒ Yes ☐ No

4. Submission Details

☐ Yes, I am enclosing further supporting information to this submission form

Provision to which my/our submission relates: <i>(Please specify the Objective, Policy, Rule, Rule Requirement, Assessment Matter, Mapping feature or other reference your submission relates to, eg TCZ-R12 Visitor Accommodation)</i>	My position on this provision is: <i>(Select one option)</i>	The reasons for my/our submission are: <i>(Please give details, eg I think this should be non-complying because we don't want this to occur in our town centre)</i>	The decision I/we want Council to make: <i>(Please specify if you want the provision to be retained, amended or deleted, eg Amend – change the activity status to non-complying)</i>
Planning Maps and Chapter 9.3	Oppose in Part	31 Worcester Boulevard is a vacant site. The documentation within Plan Change 13 refers to this site having a building on it. It is unclear how the rules relating to Residential Heritage Areas relate to new buildings in this overlay.	We seek that the rules are clearer for how new development is to occur within the Residential Heritage Area Overlay AND Remove all documentation and references to 31 Worcester Boulevard containing buildings on it.
Chapter 9.3	Oppose in Part	21 Worcester Boulevard has been updated and renovated since the preparation of the heritage assessment (RMA/2020/1713). This assessment referred to in Chapter 9.3 does not reflect what the site looks like and is used for. It is unclear in the provisions how often these assessments need to be updated, if at all.	We seek clarity on the status of the heritage assessments in light of any resource consents granted for sites which will change the site to what is portrayed in the heritage assessment.

Alice Burnett

12 May 2023

Signature of person authorised to sign on behalf of submitter

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 12/05/2023

First name: Marie

Last name: Byrne

Consultation Document Submissions

Provision: Chapter 9 Natural and Cultural Heritage

Seek Amendment

I seek the following decision from the Council

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

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

My submission is that:

Regarding Chapter 9 Schedule of Significant Heritage areas: I would like to suggest that the Medium Density Residential area in Phillipstown Cashel Street to Ferry Road, Bordesley Street to Nursery Road be considered for a heritage area protecting an area of former workers cottages. In 1936 a metropolitan planning scheme was proposed that expanded industrial areas into the residential areas of Sydenham and Phillipstown. Although the areas were not fully and formally zoned until the first review of the district planning scheme in 1968, residential housing made way for industry in those 30 years. There are heritage areas that protect workers cottages in Sydenham, but nothing in Phillipstown. Existing former workers housing in Phillipstown is increasingly being lost for multi-unit development. Without a heritage provision, the Council is allowing final removal that was initiated nearly ninety years ago. These cottages have the potential to provide affordable housing options, particularly for first home buyers. However first home buyers are being out bid of the market by developers buying the properties and demolishing them. The Council has the opportunity to stop both the loss of heritage and provide for greater affordable home options. (Historical Reference: Christchurch City Contextual History Overview - 2005)

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 12/05/2023

First name: Graham

Last name: Robinson

Consultation Document Submissions

Provision: Chapter 9 Natural and Cultural Heritage**Seek Amendment****I seek the following decision from the Council*****If seeking to make changes to a specific site or sites, please provide the address or identify the area:***

that the Teddington Lockup be added to the District Plan Heritage Schedule.

My submission is that:

the Teddington Lockup (153 Governor's Bay-Teddington Road) should be scheduled as a heritage item in the District Plan, for its high heritage values.

The two-cell lockup was built in 1877 as part of a larger police complex that included a police house and stables. The lockup is the only building remaining on site from this time.

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 12/05/2023

First name: Rachel

Last name: Crawford

Organisation:

Richmond Residents and Business Association (We are Richmond)

On behalf of:

Richmond Residents and Business Association (We are Richmond)

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:

SUBMISSION FROM THE RICHMOND RESIDENTS' and BUSINESS ASSOCIATION, CHRISTCHURCH

Plan Change 13 – Proposed Heritage

Plan Change 14 – Housing and Business Choice

We accept the changes made by Council to the Plan Change 13 and 14 documents with the following qualifications:

During our work as members of this association with our local residents, we have observed some trends emerging which need to be monitored as our drive to increase the number of residences for our growing population continues:

- Increased intensification with infill housing without due regard to the effect on the overall amenity of the district. This is particularly relevant in South Richmond where, we feel, intensification has reached a critical level.
- Loss of vegetation as sections are cleared before the construction of multiple housing units. As intensification increases there is a corresponding decrease in the amount of vegetation on private land. Council initiatives to plant two trees for every one lost on public land are to be commended but only have a moderate effect on the overall loss.
- The perceived threat to existing SAMS Special Amenity Areas/Suburban Character Areas currently in Christchurch. There must be continued efforts to preserve these areas, if only partly to acknowledge the work already done by private citizens as they work through the post-earthquake restoration phase.
- Council's inability to maintain the current infrastructure to an acceptable standard across the city. Along with more intensive development there is a need to establish sustainable practices which secure and improve current infrastructure installation and maintenance.
- Growth of social housing creates an imbalance in the ratio compared to other areas of the city.

Further to those identified trends the proposed plan changes and the overall tenure of the Resource Management Act raises other issues. We submitted these thoughts in an earlier submission in the Bill Consultation Process but we consider them to be equally relevant at this stage of the Bill's process and implementation. Therefore we think it worthy to repeat them:

- The Bill is heavily focussed on the lack of housing while ignoring the 'ripple effect' on infrastructure: utilities, roading, transport systems, social effects, and physical environment. This is particularly relevant in Christchurch where a lack of Governmental support and financial commitment for alternative transport models exists. The concept of a 15 minute city is not realised simply by building houses. It requires a holistic overview and planning if we are to avoid the housing estate catastrophes witnessed in other countries.
- The governance of such a bill implies a heavily oriented 'top down' approach ignoring the fact that there are successful town planning outcomes which are derived from an established consultation process with local residents. It does not appear to offer an avenue to work with and support local Councils who have established successful community planning environments. On the local scene, many residents in Richmond have already suffered from the frustrations of being victims of a top down approach as they sought to repair or rebuild their houses and negotiate the corridors of bureaucracy and its inability to make decisions over the ten years following the earthquakes. Property owners are still in the process of rebuilding and repairing. They have suffered inordinate amounts of stress and do not deserve to be put in a similar situation again.

In principle, we recognise the need for extra housing and support the amendment but it is our sincere wish that in putting the Act into practice, the concerns we have expressed above are considered.

In summary we support the efforts of the Council to convince the Government that a "one glove fits all" approach is not appropriate as far as this Act is concerned, and thank them for their efforts to achieve some acceptance within the Act that locality based modifications were necessary.

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 12/05/2023

First name: Catherine

Last name: Elvidge

Consultation Document Submissions

Provision: Chapter 9 Natural and Cultural Heritage

Seek Amendment

I seek the following decision from the Council

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

That the 16 Papanui War Memorial Avenues not be listed as a heritage item in Appendix 9.3.7.2.

Alternatively I seek that:

- The listing be amended to include the specific aspects of the streets which comprise the item.
- The plaques not be included in the listing.
- A street-by-street assessment of each street be undertaken and only trees from the original memorial planting or others of significant landscape value be listed.
- The trees be included in sub-chapter 9.4 Significant and other trees, rule 9.4.1.1 P6 and P12, instead of sub-chapter 9.3 Historic heritage.

My submission is that:

Refer attached submission

Provision: Chapter 9 Natural and Cultural Heritage

Seek Amendment

I seek the following decision from the Council

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

That the 16 Papanui War Memorial Avenues not be listed as a heritage item in Appendix 9.3.7.2.

Alternatively I seek that:

- The listing be amended to include the specific aspects of the streets which comprise the item.
- The plaques not be included in the listing.
- A street-by-street assessment of each street be undertaken and only trees from the original memorial planting or others of significant landscape value be listed.
- Those trees with significant landscape value be included in sub-chapter 9.4 Significant and other trees, rule 9.4.1.1 P6 and P12, instead of sub-chapter 9.3 Historic heritage.

My submission is that:

Refer attached

Attached Documents

Name
PC13 submission on Papanui War Memorial Avenues - C Elvidge

Submission on Plan Change 13 – Heritage

From: Catherine Elvidge, 11 Halton Street (Note: I am making this submission in my capacity as a resident)

Sixteen **Papanui War Memorial Avenues** are proposed to be scheduled in Appendix 9.3.7.2 as a Highly Significant heritage item. The section 32 report states that "these are proposed to be scheduled as one item, with scheduling protection of the trees and plaques." (para 2.2.21 p.) However the proposed listing in Appendix 9.3.7.2 only lists the streets and describes the item as "Papanui War Memorial Avenues". It does not state that the protection relates only to the trees and plaques, so the implication is that the whole of the street is protected - although it is unclear what this would mean in practice. If the heritage item relates only to the plaques and trees this should be specified in the schedule.

It is unclear from the s32 report what protection will be afforded the plaques and trees as a result of their listing. None of the existing or proposed rules in Chapter 9.3 Historic heritage appear to apply to either the plaques or the trees.

Existing rule 8.9.2.1 P1 requires that earthworks must not occur within 5m of a heritage item. Would this setback apply to the trees and the plaques, or all of the property boundaries along the whole street given that only the streets are referenced in the listing in Appendix 9.3.7.2? Even if only the trees and plaques, it would include any earthworks on private property within 5m of these. Breach of 8.9.2.1 P1 in respect of the trees and/or plaques would require resource consent under 8.9.2.3 RD1, with the relevant matters of discretion being those in 8.9.4.8 which refers to the historic heritage matters in 9.3.6.1. These require consideration of the maintenance and enhancement of heritage values. As such, the heritage values of the item need to be able to be clearly identified. This is not the case with the proposed Memorial Avenue provisions in PC13. Further, there is no resource management benefit gained from requiring consent for earthworks within 5m of the plaques. Such earthworks would not affect the plaques at all given their location on lampposts.

Trees

The Statement of Significance in Appendix 6 of the s32 report (copy on pages 4 and 5 of this submission) outlines the planting of memorial trees between 1943 - 1946, and refers *inter alia* to:

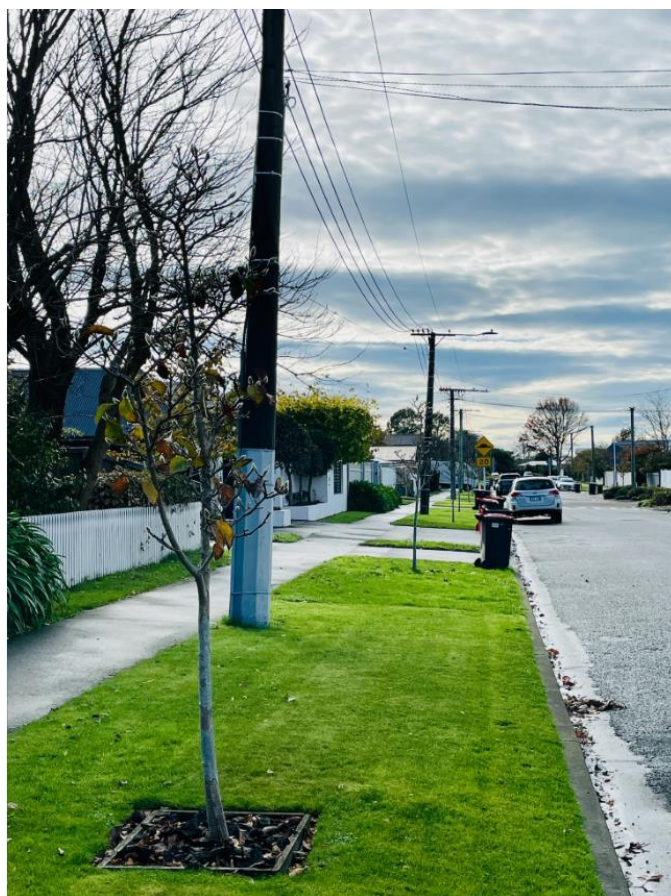
- the streets having "architectural and aesthetic significance for their landscape values".
- the trees creating a strong aesthetic for the streets "due to their scale, colour, texture and seasonal change".
- Technological and craftsmanship significance for the range of different tree species represented, "specifically chosen for their physical characteristics and the soils in the area", and "the planting and maintenance methods and techniques used".
- "high contextual significance for the groups of tree species planted in each individual street".

I acknowledge that the statements of significance are included for information purposes only and do not form part of PC13 or the District Plan itself. However they do outline the heritage values of the items, and as such will help inform the assessment of applications for resource consent for any breach of associated rules, as there is no explanation about the particular heritage value of the trees or plaques within PC13 itself.

The original trees referred to in the Statement of Significance are no longer present in many of the listed streets. As an example, Halton Street did not have any significant street trees when we purchased our property in 1999, and the current street trees (magnolias) planted when the street was kerb and channelled in the mid-2000s have not thrived and are still very small (refer photos). They do not provide significant landscape value, do not create a strong aesthetic due to scale, colour or texture, and do not appear to have any relationship to the original trees. As such, it appears that the stated reasons for including the memorial streets in the heritage item do not actually apply to this street. The same is true for some of the other streets. In comparison, others among the listed memorial streets (e.g. Dormer Street) do contain mature trees which provide significant landscape and amenity value consistent with the Statement of Significance and are worthy of protection.

It is submitted that a street-by-street assessment should be carried out on each of the 16 streets, and only those containing the original memorial street trees or mature replacement trees with similar landscape value should be included in the heritage listing.

Notwithstanding the above, if the trees are to be protected, I submit that this would be more appropriately done in sub-chapter 9.4 Significant and other trees, e.g. by including reference to the relevant Papanui War Memorial Avenues within the activity specific standards in rule 9.4.1.1 P6 and P12.



Existing streetscape – trees are difficult to see due to light conditions, but it shows that they are not a significant landscape feature within the streetscape.

Plaques

It is unclear how the plaques would be afforded any protection by listing them in Appendix 9.3.7.2 of the District Plan. They are located on street light poles, which are not subject to any rules in the plan other than general enabling provisions in Chapter 11 Utilities. The poles, plaques and land on which they are located are under the ownership of the Council (as noted in s32 report, para 3.5.6) so members of the public are not entitled to remove or alter them, and the heritage significance of these streets should be taken into consideration by the relevant Council unit when any works are proposed within these road reserves. Listing the plaques themselves in the District Plan is unnecessary and of no benefit.



Existing streetscape looking towards Harley Ave showing plaque and trees.

**CHRISTCHURCH DISTRICT PLAN – SCHEDULED HERITAGE PLACE
HERITAGE ASSESSMENT – STATEMENT OF SIGNIFICANCE
HERITAGE ITEM NUMBER 1459**

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



Photo- Christchurch City Council heritage files

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

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

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

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

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

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

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

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

References – Christchurch City Council Heritage Files

REPORT DATED: 10 JUNE 2022

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 12/05/2023

First name: Keri

Last name: Whaitiri

On behalf of: Te Rito Trust & Malcolm Hattaway

Consultation Document Submissions

Provision: Chapter 9 Natural and Cultural Heritage

Oppose

I seek the following decision from the Council

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

That the full implications of the new 'Residential Heritage Areas' are disclosed and that these do not exceed the current provisions of the 'Residential Character Areas'.

That 'Defining' and Contributory' categories in Residential Heritage Areas are removed completely from the proposed new Policy Changes.

My submission is that:

The Heritage Team of CCC have, yet again, sought to take advantage of their position and impose self-serving policy on owners of old houses in old suburbs.

The proposed CCC Heritage Policy Changes 13 and 14 seek to not only sidestep the requirements of the National Policy Statement Urban Development by applying 'Qualifying Matters' to proposed new 'Residential Heritage Areas', they also seek to bring in categorisation of non-heritage listed properties by including them as 'contributory' or 'defining'. This new heritage categorisation effectively extends the pool of heritage properties that sit under the discretion and authority of the CCC Heritage Team, thereby further substantiating their own existence. This categorisation is unnecessary and contrary to the purpose of the NPS-UD.

The fact that these 'contributory' or 'defining' properties are only shown in 'hard-copy' Policy Change documents, but not in online interactive digital maps, is highly misleading. It is an indicator of policy that has been poorly considered. It could result in a number of property owners not being aware of the effect the proposed Policy Changes might have on their non-listed property. Owners that this applies to have not been properly consulted, notified nor given the courtesy of actually knowing that their property is affected within PC13 and PC14, if they have relied on the interactive digital maps to inform them.

There is little indication of the difference between the proposed new 'Residential Heritage Areas' and existing 'Residential Character Areas'. Nor is there clear information of the purpose of the new moniker and the actual regulatory requirements that all property owners within it will be subject to. The purpose and effects of PC13 and PC14 have been poorly communicated.

Furthermore, the elevation of colonial heritage values in this day and age comes from a position of privilege and bias. It undermines the intended bicultural roots of NZ society and perpetuates one ideological system that has been enshrined in physical fabric, over intangible values that have been subjugated and erased over the past 170 years.

The NPS-UD 2020 serves a particular purpose - it is to secure sufficient development capacity for new housing. This is to counteract the housing crisis and open up opportunity for more people to have the benefit of living close to urban amenities, making 'good' areas for living more accessible to a larger part of society.


One could argue that in perpetuating the notion of 'Residential Heritage Areas' based on colonial heritage values that a Local Government Authority is limiting opportunities for future expression with building stock that departs from the colonial status quo. The idea that existing Heritage Items are subject to current restrictions, regulatory requirements and protections is valid. The notion that new categorisations of 'contributory' and 'defining' properties is an appropriate response to the NPS-UD is not valid. The purpose of the wording change from 'Residential Character Area' to 'Residential Heritage Area' is unclear. One would hope that the proposed Policy Changes were a useful step in tipping the balance of housing affordability (an aspiration that is increasingly beyond the grasp of most young NZers) as opposed to protecting the privilege of older generations.

By applying 'Qualifying Matters' to proposed new 'Residential Heritage Areas' CCC subverts a National Policy that is aimed at greater access to housing stock and proposes changes that seem to effectively increase colonial heritage protection and restrictions on development. This is in conflict with the intention of the National Policy Statement Urban Development 2020.

Our proposed Heritage Plan Change (PC13)

[Submitter Details](#)**Submission Date:** 12/05/2023**First name:** Danny**Last name:** Whiting

Attached Documents

Name	
PC13 submission Danny Whiting	

Form 5**SUBMISSION ON PUBLICLY NOTIFIED PROPOSAL FOR POLICY STATEMENT OR PLAN, CHANGE OR VARIATION***Clause 6 of Schedule 1, Resource Management Act 1991***To** Christchurch City Council**Name of submitter:** Danny Whiting (**D Whiting**)

- 1 This is a submission on Plan Change 13 (**PC13**) to the Christchurch District Plan (the **Plan**).
- 2 D Whiting could not gain an advantage in trade competition through this submission.
- 3 D Whiting's submission relates to PC13 in its entirety.
- 4 D Whiting seeks the following decision from the local authority:
 - 4.1 The relief as set out in **Annexure A**.
 - 4.2 Any other similar relief that would address the relief sought by D Whiting.
 - 4.3 All necessary consequential amendments.
- 5 **D Whiting wishes to be heard** in support of the submission.
- 6 If others make a similar submission, **D Whiting** will consider presenting a joint case with them at a hearing.

Signed for and on behalf of Danny Whiting

pp. D Whiting
12 May 2023

Address for service of submitter:

Danny Whiting
c/- Novo Group Limited
Attention: J Phillips
PO Box 365
Christchurch 8013
Email: jeremy@novogroup.co.nz

ANNEXURE A

The drafting suggested in this annexure reflects the key changes the submitter seeks. Consequential amendment may also be necessary to other parts of the proposed provisions.

The submitter proposes drafting below and seeks that this drafting, or drafting with materially similar effect, be adopted by the Council.

Suggested amendments and alternative drafting is shown in track change –requested deletions are shown using ~~red strike through~~ and requested insertions are shown using red underline.

No.	Provision	Position	Submission	Relief Sought
1.	Appendix 9.3.7.2 Schedule of Significant Historic Heritage Items (27 Glandovey Road)	Oppose	<p>The submitter opposes the spatial extent of the heritage setting 423 for heritage item 209 (27 Glandovey Road), insofar that this extends to include the properties at 7 and 9 Thornycroft Street.</p> <p>The properties at 7 and 9 Thornycroft Street have no physical relationship to 27 Glandovey Road, are in separate ownership and to the extent that there is any historical relationship or heritage value of these sites to the original estate of 27 Glandovey Road, the costs and regulation imposed by the heritage setting are not justified.</p>	Reduce the spatial extent of the heritage setting 423 (for heritage item 209 at 27 Glandovey Road) so as to exclude 7 and 9 Thornycroft Street.
2.	Revisions to historic heritage rules generally	Oppose	<p>The submitter is opposed to PC13 to the extent that it proposes to amend the historic heritage rules in the Plan in such a way that will be less enabling and/or will result in greater regulation or resource consent requirements for development requirements.</p> <p>The submitter is particularly concerned with proposed amendments to definitions, policies, rules, and assessment matters where such amendments will be inconsistent with:</p>	Delete/reject proposed amendments to definitions, policies, rules and assessment matters in PC13 and retain the status quo in respect of these provisions.

No.	Provision	Position	Submission	Relief Sought
			<ul style="list-style-type: none"> • strategic objective 3.3.1 to 'foster investment certainty'; and, • strategic objective 3.3.2 to '<i>minimise</i>: A. transaction costs and reliance on resource consent processes; and B. the number, extent, and prescriptiveness of development controls and design standards in the rules, in order to encourage innovation and choice; and C. the requirements for notification and written approval...'; and • heritage objective 9.3.2.1.1 to <i>enable and support</i>: 'A. the ongoing retention, use and adaptive re-use; and B. the maintenance, repair, upgrade, restoration and reconstruction; of historic heritage' 	

Our proposed Heritage Plan Change (PC13)

Submitter Details


Submission Date: 17/05/2023

First name: Richard

Last name: Peebles

Organisation: Peebles Group Limited

Attached Documents

Name	
PC13 submission Peebles Group Limited	

Form 5

SUBMISSION ON PUBLICLY NOTIFIED PROPOSAL FOR POLICY STATEMENT OR PLAN, CHANGE OR VARIATION*Clause 6 of Schedule 1, Resource Management Act 1991***To** Christchurch City Council**Name of submitter:** Peebles Group Limited (**Peebles Group**)

- 1 This is a submission on Plan Change 13 (**PC13**) to the Christchurch District Plan (the **Plan**).
- 2 Peebles Group could not gain an advantage in trade competition through this submission.
- 3 Peebles Group's submission relates to PC13 in its entirety.
- 4 Peebles Group seeks the following decision from the local authority:
 - 4.1 The relief as set out in **Annexure A**.
 - 4.2 Any other similar relief that would address the relief sought by Peebles Group.
 - 4.3 All necessary consequential amendments.
- 5 **Peebles Group wishes to be heard** in support of the submission.
- 6 If others make a similar submission, **Peebles Group** will consider presenting a joint case with them at a hearing.

Signed for and on behalf of Peebles Group Limited


pp. R Peebles
12 May 2023

Address for service of submitter:

Peebles Group Limited
c/- Novo Group Limited
Attention: J Phillips
PO Box 365
Christchurch 8013
Email: jeremy@novogroup.co.nz

ANNEXURE A

The drafting suggested in this annexure reflects the key changes the submitter seeks. Consequential amendment may also be necessary to other parts of the proposed provisions.

The submitter proposes drafting below and seeks that this drafting, or drafting with materially similar effect, be adopted by the Council.

Suggested amendments and alternative drafting is shown in track change –requested deletions are shown using ~~red strike through~~ and requested insertions are shown using red underline.

No.	Provision	Position	Submission	Relief Sought
1.	Revisions to historic heritage rules generally	Oppose	<p>The submitter is opposed to PC13 to the extent that it proposes to amend the historic heritage rules in the Plan in such a way that will be less enabling and/or will result in greater regulation or resource consent requirements for development requirements.</p> <p>The submitter is particularly concerned with proposed amendments to definitions, policies, rules, and assessment matters where such amendments will be inconsistent with:</p> <ul style="list-style-type: none"> • strategic objective 3.3.1 to ‘foster investment certainty’; and, • strategic objective 3.3.2 to <u>‘minimise: A. transaction costs and reliance on resource consent processes; and B. the number, extent, and prescriptiveness of development controls and design standards in the rules, in order to encourage innovation and choice; and C. the requirements for notification and written approval...’</u>; and • heritage objective 9.3.2.1.1 to <u>enable and support: ‘A. the ongoing retention, use and adaptive re-use; and B. the maintenance, repair, upgrade, restoration and reconstruction; of historic heritage’</u> 	Delete/reject proposed amendments to definitions, policies, rules and assessment matters in PC13 and retain the status quo in respect of these provisions.

Our proposed Heritage Plan Change (PC13)


[Submitter Details](#)

Submission Date: 17/05/2023

First name: Richard and Suzanne **Last name:** Peebles

On behalf of: R&S Peebles

Attached Documents

Name	
PC13 submission Richard and Suzanne Peebles	

Form 5

SUBMISSION ON PUBLICLY NOTIFIED PROPOSAL FOR POLICY STATEMENT OR PLAN, CHANGE OR VARIATION*Clause 6 of Schedule 1, Resource Management Act 1991***To** Christchurch City Council**Name of submitter:** Richard and Suzanne Peebles (**R & S Peebles**)

- 1 This is a submission on Plan Change 13 (**PC13**) to the Christchurch District Plan (the **Plan**).
- 2 R & S Peebles could not gain an advantage in trade competition through this submission.
- 3 R & S Peebles's submission relates to PC13 in its entirety.
- 4 R & S Peebles seeks the following decision from the local authority:
 - 4.1 The relief as set out in **Annexure A**.
 - 4.2 Any other similar relief that would address the relief sought by R & S Peebles.
 - 4.3 All necessary consequential amendments.
- 5 **R & S Peebles wishes to be heard** in support of the submission.
- 6 If others make a similar submission, **R & S Peebles** will consider presenting a joint case with them at a hearing.

Signed for and on behalf of Richard and Suzanne Peebles


pp. R & S Peebles
12 May 2023

Address for service of submitter:

Richard and Suzanne Peebles
c/- Novo Group Limited
Attention: J Phillips
PO Box 365
Christchurch 8013
Email: jeremy@novogroup.co.nz

ANNEXURE A

The drafting suggested in this annexure reflects the key changes the submitter seeks. Consequential amendment may also be necessary to other parts of the proposed provisions.

The submitter proposes drafting below and seeks that this drafting, or drafting with materially similar effect, be adopted by the Council.

Suggested amendments and alternative drafting is shown in track change –requested deletions are shown using ~~red strike through~~ and requested insertions are shown using red underline.

No.	Provision	Position	Submission	Relief Sought
1.	Appendix 9.3.7.2 Schedule of Significant Historic Heritage Items (27 Glandovey Road)	Oppose	<p>The submitter opposes the spatial extent of the heritage setting 423 for heritage item 209 (27 Glandovey Road), insofar that this extends to include the properties at 7 and 9 Thornycroft Street.</p> <p>The properties at 7 and 9 Thornycroft Street have no physical relationship to 27 Glandovey Road, are in separate ownership and to the extent that there is any historical relationship or heritage value of these sites to the original estate of 27 Glandovey Road, the costs and regulation imposed by the heritage setting are not justified.</p>	Reduce the spatial extent of the heritage setting 423 (for heritage item 209 at 27 Glandovey Road) so as to exclude 7 and 9 Thornycroft Street.
2.	Revisions to historic heritage rules generally	Oppose	<p>The submitter is opposed to PC13 to the extent that it proposes to amend the historic heritage rules in the Plan in such a way that will be less enabling and/or will result in greater regulation or resource consent requirements for development requirements.</p> <p>The submitter is particularly concerned with proposed amendments to definitions, policies, rules, and assessment matters where such amendments will be inconsistent with:</p>	Delete/reject proposed amendments to definitions, policies, rules and assessment matters in PC13 and retain the status quo in respect of these provisions.

No.	Provision	Position	Submission	Relief Sought
			<ul style="list-style-type: none"> • strategic objective 3.3.1 to 'foster investment certainty'; and, • strategic objective 3.3.2 to '<u>minimise</u>: A. transaction costs and reliance on resource consent processes; and B. the number, extent, and prescriptiveness of development controls and design standards in the rules, in order to encourage innovation and choice; and C. the requirements for notification and written approval...'; and • heritage objective 9.3.2.1.1 to <u>enable and support</u>: 'A. the ongoing retention, use and adaptive re-use; and B. the maintenance, repair, upgrade, restoration and reconstruction; of historic heritage' 	

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 12/05/2023


First name: Richard

Last name: Peebles

Organisation: 181 High Limited

On behalf of: 172 High

Attached Documents

Name	
PC13 submission 181 High Limited	

Form 5

SUBMISSION ON PUBLICLY NOTIFIED PROPOSAL FOR POLICY STATEMENT OR PLAN, CHANGE OR VARIATION

*Clause 6 of Schedule 1, Resource Management Act 1991***To** Christchurch City Council**Name of submitter:** 181 High Limited (**181 High**)

- 1 This is a submission on Plan Change 13 (**PC13**) to the Christchurch District Plan (the **Plan**).
- 2 181 High could not gain an advantage in trade competition through this submission.
- 3 181 High's submission relates to PC13 in its entirety.
- 4 181 High seeks the following decision from the local authority:
 - 4.1 The relief as set out in **Annexure A**.
 - 4.2 Any other similar relief that would address the relief sought by 181 High.
 - 4.3 All necessary consequential amendments.
- 5 **181 High wishes to be heard** in support of the submission.
- 6 If others make a similar submission, **181 High** will consider presenting a joint case with them at a hearing.

Signed for and on behalf of 181 High Limited


pp. R Peebles
12 May 2023

Address for service of submitter:

181 High Limited
c/- Novo Group Limited
Attention: J Phillips
PO Box 365
Christchurch 8013
Email: jeremy@novogroup.co.nz

ANNEXURE A

The drafting suggested in this annexure reflects the key changes the submitter seeks. Consequential amendment may also be necessary to other parts of the proposed provisions.

The submitter proposes drafting below and seeks that this drafting, or drafting with materially similar effect, be adopted by the Council.

Suggested amendments and alternative drafting is shown in track change –requested deletions are shown using ~~red strike through~~ and requested insertions are shown using red underline.

No.	Provision	Position	Submission	Relief Sought
1.	Heritage items and settings aerial map (Aerial map reference 693, Heritage item number 1313, heritage setting number 555)	Oppose	The submitter opposes the spatial extent of the heritage setting proposed (for the former AJ Whites building facade) on Aerial map reference 693 for heritage item number 1313. The heritage setting extends well beyond the extent of the listed façade and unnecessarily constrains the modern and recently developed buildings within the setting. Among other reasons, the submitter is concerned at the costs and regulation imposed by the change relative to the benefits of the change.	Reduce the spatial extent of the heritage setting 555 as proposed on Aerial map reference 693, for Heritage item number 1313 so that it is coincidental to the extent of the heritage item.
2.	Revisions to historic heritage rules generally	Oppose	<p>The submitter is opposed to PC13 to the extent that it proposes to amend the historic heritage rules in the Plan in such a way that will be less enabling and/or will result in greater regulation or resource consent requirements for development requirements.</p> <p>The submitter is particularly concerned with proposed amendments to definitions, policies, rules, and assessment matters where such amendments will be inconsistent with:</p> <ul style="list-style-type: none"> • strategic objective 3.3.1 to ‘foster investment certainty’; and, 	Delete/reject proposed amendments to definitions, policies, rules and assessment matters in PC13 and retain the status quo in respect of these provisions.

No.	Provision	Position	Submission	Relief Sought
			<ul style="list-style-type: none"> • strategic objective 3.3.2 to '<u>minimise</u>: A. transaction costs and reliance on resource consent processes; and B. the number, extent, and prescriptiveness of development controls and design standards in the rules, in order to encourage innovation and choice; and C. the requirements for notification and written approval...'; and • heritage objective 9.3.2.1.1 to <u>enable and support</u>: 'A. the ongoing retention, use and adaptive re-use; and B. the maintenance, repair, upgrade, restoration and reconstruction; of historic heritage' 	

Our proposed Heritage Plan Change (PC13)



Submitter Details

Submission Date: 12/05/2023

First name: James David **Last name:** Bundy

On behalf of: Governors Bay Heritage Trust

Attached Documents

Name	
Heather Bundy Email	
Heritage Plan Change 13 Submission	

Jackson, Andrew

From: Heather Bundy <heatherbundy8@gmail.com>
Sent: Friday, 12 May 2023 4:37 pm
To: Engagement; Heather Bundy
Subject: Submission Heritage Plan Change 13: Burnside Stable and Lockup at Allandale
Attachments: Heritage Plan Change 13 Submission.pdf

Good Afternoon

Please find attached a submission to have 2 heritage buildings scheduled in the District Plan

Regards

David Bundy

Trustee Governors Bay Heritage Trust



Virus-free. www.avg.com

Have your say

**Housing and Business Choice Plan Change 14
and Heritage Plan Change 13**

Clause 6 of Schedule 1 Resource Management Act 1991

Before we get started we'd like to ask a few questions about you. This helps us better understand who we are hearing from.

Gender: ☒ Male ☐ Female ☐ Non-binary/another gender

Age: ☐ Under 18 years ☐ 18-24 years ☐ 25-34 years ☐ 35-49 years ☐ 50-64 years
☒ 65-79 years ☐ over 80 years

Ethnicity: ☒ New Zealand European ☐ Māori ☐ Pacific Peoples ☐ Asian
☐ Middle Eastern/Latin American/African ☐ Other European ☐ Other

*** Required information**

Name* James David Bundy
Address* 120 Governors Bay Teddington Rd. Postcode* 8971
Email Heather.Bundy@gmail.com Phone no. 021 206 8432

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

Organisation's name Governors Bay Heritage Trust.
Your role Trustee.

Trade competition and adverse effects* (select appropriate)

☐ I could / ☒ could not gain an advantage in trade competition through this submission.

If you are a person who could gain an advantage in trade competition through this submission, are you directly affected by an effect of the proposed plan change/part of the plan change that –

(a) adversely affects the environment, and

(b) does not relate to the trade competition or the effects of trade competition?

☐ Yes ☒ No

* A person who could gain an advantage in trade competition through the submission may make a submission only if you answered Yes to the above, as per clause 6(4) of Schedule 1 of the Resource Management Act 1991.

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

- ☐ I wish to speak in support of my submission on Plan Change 13
☐ I wish to speak in support of my submission on Plan Change 14
☒ I do not wish to speak.

Joint submissions (Please tick this box if you agree)

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

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

☐ Yes, I have attached extra sheets. ☒ No, I have not attached extra sheets.

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

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

Signature [Signature]

Date 17th May

2023

3:45 pm

Have your say

Heritage Plan Change 13

Housing and Business Choice Plan Change 14

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

(Please continue on separate sheet(s) if necessary.)

Two heritage buildings to be scheduled
in the district plan.

My submission is that:*

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

I seek the following decision from the Council:*

(Please give precise details stating what amendments you wish to see made to the proposed Plan Change.

Please continue on separate sheet(s) if necessary.)

That the Burnside Stable at 79 Bamfords
road Allandale be scheduled in the
District Plan.



That the Lockup at Allandale on Council
reserve be scheduled in the District Plan.

2

Our proposed Heritage Plan Change (PC13)

[Submitter Details](#)**Submission Date:** 12/05/2023**First name:** Diana**Last name:** Shand

Attached Documents

Name	
Diana Shand PC13 Email	
Diana Shand PC13 Further Email Reply	
Diana Shand submission on plan change 13 14	

Jackson, Andrew

From: diana.shand@xtra.co.nz
Sent: Friday, 12 May 2023 11:57 pm
To: Engagement
Subject: Heritage Plan Change (PC13) submission
Attachments: Diana Shand aubmission on plan change 13 & 14.docx

Jackson, Andrew

From: diana.shand@xtra.co.nz
Sent: Tuesday, 16 May 2023 12:07 pm
To: Engagement
Subject: RE: Heritage Plan Change (PC13) and Housing and Business Choice Plan Change (PC14) submission

Sorry about that, but in the end I found it very hard to use the compulsory formand it kept freezing my laptop. Will this this answer the questions appropriately?

1. Trade competition and adverse effects: (could or could not) - [this will not /could not have trade competition and adverse effects and I/we are not involved in Trade](#)
2. Gain an advantage in trade competition through this submission: (I am or I am not) [We/I am not involved in trade competition and will gain no advantage in trade competition.](#)

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

Diana

Diana Shand 021 471 989

On 16/05/2023 11:18 NZST Engagement <engagement@ccc.govt.nz> wrote:

Kia ora Diana,

Thanks for your feedback.

Can you please answer the questions below, allowing me to lodge your submission to the correct consultation platform (I apologise that if I missed the answers in your document)?

The plan change consultation has a compulsory form (this is a requirement of the relevant central government legislation), which means there are additional sections that you need to complete to provide feedback.

1. Trade competition and adverse effects: (could or could not)
2. Gain an advantage in trade competition through this submission: (I am or I am not)

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

Once again, thanks for taking your time to provide your feedback.

Ngā mihi,

Aviva Cui

Engagement Assistant

Communications and Engagement

Pronouns: she/her



03 941-6844 | 027 367 1828



Aviva.cui@ccc.govt.nz



Te Hononga Civic Offices, 53 Hereford Street, Christchurch



PO Box 73016, Christchurch 8154



ccc.govt.nz



From: diana.shand@xtra.co.nz <diana.shand@xtra.co.nz>

Sent: Friday, 12 May 2023 11:47 pm

To: Engagement <engagement@ccc.govt.nz>

Subject: Heritage Plan Change (PC13) and Housing and Business Choice Plan Change (PC14) submission

This electronic email and any files transmitted with it are intended solely for the use of the individual or entity to whom they are addressed.

The views expressed in this message are those of the individual sender and may not necessarily reflect the views of the Christchurch City Council.

If you are not the correct recipient of this email please advise the sender and delete the email.



Dinaa Shand
Submission on Plan Change 13

I wish to be heard

Diana Shand
P O Box 2306,
Christchurch 8140
Mob 021 471 989
Diana.shand@xtra.co.nz

I am a resident since 1983 in the inner city west...and wish to make a submission on PC 13 and be heard if there is the opportunity.

I support the proposed Inner-City West Residential Heritage Area

This is not only for people that live in the area, but for all the city. The heritage and character of domestic architecture, the established trees, the public and private gardens, the sunlight, the heritage buildings and the older architecture in both institutions and domestic homes, gives us our colonial development history with a concentration of architectural, cultural and social history that not only attracts tourism, but brings and retains people in our community. This central “cultural quarter” gives a sense of pride and place well beyond the residents.

I support Plan Change 13 measures that recognise of importance of residential heritage and character, and support the all Residential Heritage Areas that are proposed, indeed would further strength them.

I would continue to ask that Cranmer Square be included in the Inner City West Residential Heritage area .

Alternatives to high rise and cramped-living densification:

To these end, I am concerned that the pressured planning for densification, In the interests of providing housing, will have adverse effects on such outcomes. Housing is needed in other centres, but as there has already been major developments to meet post- earthquake needs.

Strengthened heritage buildings that can be used for contemporary purposes.

I still think housing and other goals are achievable and still meet government's expectations for an environment that brings about improved wellbeing of people and communities but only if CCC amends its current draft plan.

The post-quake plan outlined the need to make the CBD more condensed, 'The Core', and to then develop a border around The Core (BD) that would be used for a range of commercial and residential developments enabling mixed use residential/commercial - 'The Frame'. and as the City Council has expressed in its original response to Government, we should not be nor do we need to be, forced into the same Urban Development planning framework as Auckland.

What we risk with this forcing, is to end up with a city of disparate high rise, full of small crowded apartments, or multi developments serving as short-stay AirBnb or for seasonal workers, or investment

properties...not homes. Why has the City Council now taken the path it argued so rationally against? This will risk a drastic effect on our living as well as our heritage value.

There are other ways of increasing the housing supply

Other ways to increase the supply of housing include: restricting AirBnb in non-hosted urban properties, promoting the repair of the still-unrepaired earthquake-damaged houses, incentivising the use of “ghost houses” (the estimated hundreds, if not thousands, of near-permanently empty houses throughout our city), restoring commuter rail to allow to access work and education by regular, rapid affordable public transport from as far as Ashburton or Waipara.

Design controls are needed:

To that end we do not agree with high rise planning without design controls which ensure adequate space and access to sunlight, natural light, fresh air, community facilities and access to open space nearby.

Building heights

In my area with nationally and locally important heritage, we oppose heights which adversely affects existing homes. Many large older residences already provide hidden density by virtue of the original generous dimensions. These dimensions have led to homes being renovated to encompass several living units, or to house the larger or special families which would not otherwise find an apartment sufficient to their needs. In the ICON area many of these provide the basis of “residential heritage” - heritage that “contributes to our own personal sense of belonging and identity and anchors us to our communities and our city” (Our Heritage, Our Taonga – Heritage Strategy 2019-2029)

Buildings that dwarf other buildings, taking their sunlight and privacy, such as Gloucester Towers, rightly identified out of character in scale, adversely affect the quality of life for those around, taking their sunlight and privacy.

Commercial drift undermines residential quality and the commercial district

I oppose commercial drift into our neighbourhood, in which commercial operations taking over residential buildings and alter them irreparably. This is different from people operating low impact business from their own homes or cultural and educational institutions.

Over the decades the CBD has drifted east, displacing domestic residences. This has included the building that now houses the City Council, the offices allowed in the West Avon Flats, the office buildings that now creep along Montreal Street. And still some find it cheaper to put offices in older residential homes, and are allowed over time to list these as Commercial – abandoning all residential use or requirements. This is happening all along the north side of Worcester Boulevard, only a few decades ago full of homes or tenants. We object to the deterioration in the neighbourhood....which must undermine the viability of the Arts Centre, among other things.

Commercial drift west of the river must also undermine the recovery of the pre-earthquake CBD, and the so the vitality of the City itself.



I ask that Commercial use be confined to Oxford Terrace. Noting the struggle of commercial buildings along Cambridge Terrace, why not convert these to residential use? And to keep the liveability and

heritage values of our area, we ask that the Medium Density Zone should extend south from 59 Gloucester Street in a direct line south to the River at 75 Cambridge Terrace, displacing the Mixed Use Zone. This is to avoid the risk of high rise building which would shade and chill the Arts Centre and many residences in season and would detrimentally alter the scale and ambience of this area, as shown so graphically in Appendix 16 of PC 13 Consultation Document .

Our proposed Heritage Plan Change (PC13)

[Submitter Details](#)**Submission Date:** 12/05/2023**First name:** Dorothy**Last name:** Lovell-Smith

Attached Documents

Name	
Dorothy Lovell-Smith Email	
D Lovell-Smith Submission for CCC intensification plan may 23	
Dorothy Lovell-Smith Reply Email	

Jackson, Andrew

From: Dorothy Lovell-Smith <dotlsnz@gmail.com>
Sent: Friday, 12 May 2023 4:05 pm
To: Engagement
Subject: submission on Housing and business choice plan
Attachments: Submission for CCC intensification plan may '23.odt

Hi

I have spent most of today getting more and more frustrated and infuriated with your make a submission form . every time I tried to move forward on the form it seemed to lose everything I had previously written.. So here is the gist of what I want to say attached

Thanks

Dot Lovell Smith

Personal details;

Name Dot Lovell-Smith

email;dotlsnz@gmail.com

daytime ph 03 9600545 or 0210732114

Address 37 Amuri St , Hei Hei, 8042

My submission;

I oppose the plan to include the Hornby area in the plan for High and Medium density housing intensification.

All planning and development for the future has to take into account climate change, We need to lower emissions not increase them by building high density towers in satellite suburbs, when the only option for most workers is the private car to get them to work and play

Hornby is a long way from the city centre and some of the surviving housing areas demonstrate past planning that allowed a mix of housing on sections where families could grow their own food to feed their families and neighbours. The houses were linked by wide roads, with alleyways linking housing to shopping areas, parks and schools. Since the fifties when the areas of Hei Hei , Islington and Hornby were built to house the workers needed in the area a lot of infill development has taken place. Now old large sections are also being cleared and any planning seems to have been haphazard and determined by private developers being determined to cram as many dwellings as possible onto the section. Existing trees have been destroyed and the dwellings built with no regard to sunshine and privacy. The plan allows for high density and medium density building to take place on the same street. This will look very strange. Slum building. The people of Hornby deserve better.

I support the CCC plan to include the preservation of trees as heritage. More existing trees need to be preserved from development.

Why are the old state housing areas not preserved as heritage sites?. A reminder of a time when workers were valued and supported. Christchurch city was not built by the rich and privileged but by the workers. The tangata whenua and the immigrants who came here.

I very much oppose the idea that large parts of Hornby area should be considered for the private development of high density housing and more medium level housing. The existing examples of private development medium density housing in Christchurch eg Addington and just down the road in Amuri Street show that (most) private developers have no desire to provide housing that is attractive and supports mental and physical health, with green space that allows family exercise and relaxation.

Since the earthquakes there have already been many new housing developments in the area surrounding Hornby where planning has included green space, swales and bike tracks installed. But thoughtful planning seems to have been missing. Eg-Footpaths are missing from suburban streets forcing children and families to walk on the roads. Bus services are inadequate forcing new residents into cars to get to work. With no off road parking this is causing very crowded streets. Bike tracks that have been made in various subdivisions do not link to each other to make sensible easy to follow routes to local shops and schools. We need these areas enhanced and made to work well for the inhabitants. We need more land in the Hornby preserved and new land purchased to be

future green space.

Hornby is a 10 km from the city centre and to allow high density housing before better transport facilities exist is madness.

The local transport infrastructure is already struggling. Road travel in the area has increased hugely since the quakes and the migration out west, Our main roads are clogged for most of the day. Distribution of goods through trucking is the main local industry and until the use of the existing and/or a new rail network is greatly increased, and buses travel to all parts of the city from Hornby any high density housing should be concentrated closer to the city.

Why not make all buildings containing retail and light industry in Moorhouse Av, Fitzgerald Av Arenues, and Sydenham, three storied with housing accomodation being the top story. The separation between residential, retail and light industry is a hangover form Victorian times when light industry was often very smelly or dangerous.

Increasing the population in Hornby is a no-brainer . We are lacking in many community facilites. It has taken 20 years of agitation to get the CCC to accept the idea of a need for a decent library and swimming pool to support the health and development of local children and start the build. Its still not finished and would probably prove to be inadequate for an increased population.

We dont have huge parks, and lots of sports fields, huge sports centres, convention and community centres, a university, art galleries, movie theatres, night clubs, restaurants or the sea close by. We don't have frequent bus services and train services that access work and education centres. We have streets full of cars and enormous trucks. Overloaded carparks. Crumbling narrow footpaths, (Or no footpaths, around the shopping centres and streets) Our public pathways have become carparks and are often strewn with rubbish from the many fast food and liquor outlets.

There are many examples of well planned housing developments around the world, where the health and well being of the residents is paramount. We need any development to be attractive and well designed. Suburbs that are built and work for happy healthy parents and children. We do not want suburban housing planned by private developers out to make a quick profit. Housing developments need to be well planned and built by governments works departments and community owned.

We definitely do not need to continue to be the suburb that is ignored until it can be a dumping ground for new problems.

12.5.2023

Jackson, Andrew

From: Dorothy Lovell-Smith <dotlsnz@gmail.com>
Sent: Monday, 15 May 2023 8:50 pm
To: Engagement
Subject: Re: submission on Housing and business choice plan

Hi Aviva

Thank you for your email. You ask me to answer some questions but .. I do not understand what the questions are. I presume the first two questions could be about whether I gain advantage in my business or trade by putting my point of view.

I am in fact a retired person living on the pension in the 75-70yrs age bracket. I do not own a business or practise a trade. So I think the answer is [no.to](#) both questions.

The questions about whether I want to present my submission in person.

1.No I do not want to present in person

2 No I do not want to combine with someone else to present my submission,

Please please find someone who can write a submission form [that.is](#):- clear, simple.and not too "techie".but easy to use

-includes lots of space for personal opinion

-is not only asking for a point on a scale of agreement. (Sometimes I disagree with the whole basic premise)

-is realistic in the assessment of how long it will take to read the supporting information and write a submission. We should be able to save the form and return to it at a later time. OR If it can't be 'saved' we need to know that in the first paragraph so we can be encouraged to present our ideas by attaching a separate document..or copying and pasting from a saved document.into a designated space.

-includes the closing date.

Thank you

Dot Lovell-Smith



Virus-free. www.avast.com

On Mon, 15 May 2023 at 07:39, Engagement <engagement@ccc.govt.nz> wrote:

Mōrena Dorothy,

Thanks for submitting your feedback on Proposed District Plan

I am so sorry to hear about your frustration. I can confirm that I will submit for you to the correct confirmation platform (as a normal submission instead of a late submission). Can you please answer the below questions?

The Plan Change consultation has a compulsory form (this is a requirement of the relevant central government legislation), which means there are additional sections that you need to complete to provide feedback.

1. **Trade competition** and adverse effects: could or could not
2. **Gain an advantage in trade competition** through this submission: I am or I am not

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

1. Would you like to present your submission in person at a **hearing**? Yes or No.

2. If others, make a similar submission I will consider **presenting a joint case** with them at the hearing (do not tick if you would not consider a joint case). Yes or No.

Once again, we appreciate your time, and appreciate your feedback.

Ngā mihi,

Aviva Cui

Engagement Assistant

Communications and Engagement

Pronouns: she/her



03 941-6844 | 027 367 1828



Aviva.cui@ccc.govt.nz



Te Hononga Civic Offices, 53 Hereford Street, Christchurch



PO Box 73016, Christchurch 8154



ccc.govt.nz



From: Dorothy Lovell-Smith <dotlsnz@gmail.com>

Sent: Friday, 12 May 2023 4:05 pm

To: Engagement <engagement@ccc.govt.nz>

Subject: submission on Housing and business choice plan

Hi

I have spent most of today getting more and more frustrated and infuriated with your make a submission form . every time I tried to move forward on the form it seemed to lose everything I had previously written.. So here is the gist of what I want to say attached

Thanks

Dot Lovell Smith

This electronic email and any files transmitted with it are intended solely for the use of the individual or entity to whom they are addressed.

The views expressed in this message are those of the individual sender and may not necessarily reflect the views of the Christchurch City Council.

If you are not the correct recipient of this email please advise the sender and delete the email.



Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 12/05/2023

First name: Callum

Last name: Ward

Organisation:

Waihoru Spreydon-Cashmere-Heathcote Community Board

Consultation Document Submissions

Provision: Chapter 14 Residential

Support

I seek the following decision from the Council

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

My submission is that:

There are more feedback in this submission. Please see the attachment.

1. Residential Heritage Areas

The Board supports the creation of two Residential Heritage Areas in Waihoru Spreydon-Cashmere-Heathcote that merit inclusion as a Qualifying Matter, these being:

- MacMillan Ave (Cashmere)

Shelley/Forbes St (Sydenham)


Attached Documents

Name
PC13 WSCH Community Board

Our proposed Heritage Plan Change (PC13)

[Submitter Details](#)**Submission Date:** 12/05/2023**First name:** Julie**Last name:** Villard

Attached Documents

Name	
Submission P13 Julie Villard	

Screen shots of my submission for P13

I tried 7 times to make a submission, and got extremely frustrated with the system, ending in a grey screen frozen after having hit the submit button.

You have now a copy of each page of my submission I would like acknowledged. Best regards Julie Villard

Our proposed Heritage Plan Change
mission

If you consider there are compelling reasons why your contact details should be kept confidential, please contact our Statutory Administrator Adviser on 03 941 8999 or 0800 800 169 (Banks Peninsula).

[View the Christchurch City Council Privacy Statement 2020.](#)

Are you submitting as an individual or as an organisation?

☒ Individual
 ☐ Organisation

First name: *

julie

Last name: *

villard

On behalf of:

As part of your submission, you must provide an address we can use to contact you.

Email: *(preferred)*

juliemarie.villard@gmail.com

Postal address: (or alternative method of service under section 352 of the Act)

21 Bridle Path

21 Bridle Path, Lyttelton 8082

Daytime Phone:

021771925

1. Submitter Details
2. Submissions on Plan Change
3. Review my Submission Points
4. Supporting Documents
5. Submit

Have your say

Submission sessions time out after 45 minutes

Our feedback form works best if you're using Google Chrome. If you are using a different browser and you think you will need a little longer than this to make your submission, we advise cutting and pasting from a word document, to avoid losing any information.

If you have any questions, please contact the Engagement Advisor.

1. Submitter Details

2. Submissions on Plan Change

3. Review my Submission Points

4. Supporting Documents

5. Submit

Here is a table showing all the submission points that you have saved so far. If you would like to edit a point, simply click edit and save again. To delete a point, use the delete button provided in the table.

Plan Section	Support/Oppose	I seek the following decision from the Council <i>If seeking to make changes to a specific site or sites, please provide the address or identify the area</i>	My submission is that

Remove any yellow sites identified by Council as "neutral" (yellow) on the location map appendix 9.3.7.8.6 Lyttelton residential Heritage area.

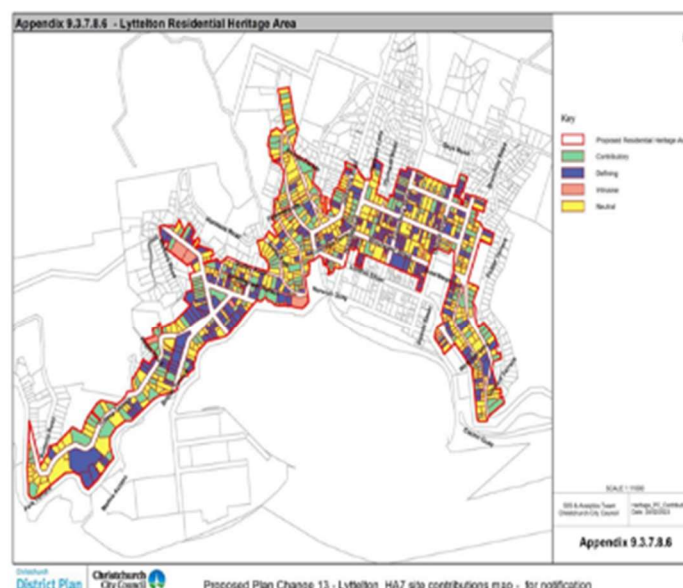
Remove entirely Lyttelton from the Heritage zoning.

I would like to advocate for people living in Lyttelton. Lyttelton is a village with more than 400 types of architecture according to Wikipedia it is a working port, and was at the epicentre of the 2011 earthquake. Lyttelton's fabric is constantly evolving, for the better and for the worse and that's why Lyttelton is well-known for: eclectic architecture. The new zoning called "heritage area", is a mistake, and Lyttelton will be locked in a cast iron "historical" image of the past, where every single move will be overseeing and over restricted by the Council. No, I don't understand the need for a heritage area, that's why we have the character overlay area already in place. Well, even lately, it has been hugely controversial with 2 resource consents granted for the same in less than 2 years, the 2 approved by Council, and hugely rejected by the people of Lyttelton: 1 design is stuck in the past, the other one is modern. link here:

(<https://www.stuff.co.nz/national/126903301/planned-lyttelton-apartment-building-designed-by-firm-behind-landmark-building-in-wellington>)

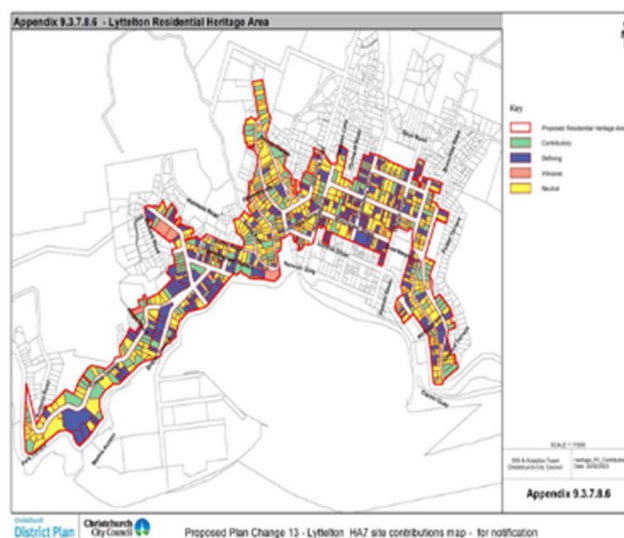
The Heritage zoning is once again too large and should be limited to sites directly identified as defining (blue) and contributory (green) the location map appendix 9.3.7.8.6 Lyttelton residential Heritage area

Location



Heritage
zoning.

Location



Not more than that. As you can see on the map half of the sites of the proposed Lyttelton residential Heritage area are in yellow, meaning "neutral" they do not have any architectural significance or historical values.

It is insane to me, to ask all these sites to be included in this new zoning. These sites do not deserve to be punished, or their current value reduced. One more thing: More RC for everyone is ridiculous, beautiful hatches from randomness, and Lyttelton is very much that.

1. Submitter Details

2. Submissions on Plan Change

3. Review my Submission Points

4. Supporting Documents

5. Submit

If you have any questions, please contact the Engagement Advisor.

1. Submitter Details

2. Submissions on Plan Change

3. Review my Submission Points

4. Supporting Documents

5. Submit

Please click the submit button to finalise your submission. Once you click submit, you will be sent a confirmation email from the Council.

*

☒ I could

☐ I could not

Gain an advantage in trade competition through this submission

☒ I am

☐ I am not

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

a. adversely affects the environment, and

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

Note to person making submission:

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

- 1991

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

☒ Yes

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

Additional requirements for hearing:

The following questions are not part of your submission on the District Plan - you do not have to answer them. However, we would very much appreciate you telling us a little about yourself, as it helps us improve our engagement methods to reach people if we understand who we are hearing from.

Age:

- ☐ Under 18 years
- ☐ 18-24 years
- ☐ 25-34 years
- ☒ 35-49 years
- ☐ 50-64 years
- ☐ 65-79 years
- ☐ Over 80 years

Gender:

- ☐ Male
- ☒ Female
- ☐ Non-binary / another gender

Ethnicity:

- ☒ New Zealand European
- ☐ Maori
- ☐ Pacific Peoples
- ☐ Asian
- ☐ Middle Eastern/Latin American/African
- ☐ Other European
- ☐ Other

Submit

1. Submitter Details

2. Submissions on Plan Change

3. Review my Submission Points

4. Supporting Documents

5. Submit

Our proposed Heritage Plan Change (PC13)


Submitter Details

Submission Date: 12/05/2023

First name: Dr. Bruce

Last name: Harding

Attached Documents

Name	
Dr Ann PC13	

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 12/05/2023

First name: Dr. Bruce

Last name: Harding

Consultation Document Submissions

Provision: Chapter 14 Residential

Seek Amendment

I seek the following decision from the Council

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

Clarity on the RHA 8 (Macmillan Avenue) boundary, as it was all covered in the Special Amenity Area (SaM 17 & 17A) provisions in the late 1990s City Plan. Why is one end of the street singled out and the home of John Macmillan Brown (35 Macmillan Ave) excluded? Do the former SaM17/17a character overlays still in place and continue to have effect? If not, why not? I would seek policy clarity in the finalized PC13 documentation by way of footnote or policy box for the better informing of citizens and ratepayers. The underlying heritage kaupapa/philosophy and criteria for character retention needs to be clearly affixed to planning documents/schemata.


My submission is that:

I am speaking to Residential Heritage Area 8 (eastern Macmillan Avenue) and the need for the clear highlighting of historic properties in the CCC's digital & online files. I find it puzzling that collective character recognition (p.24) is not maintained throughout the whole of Macmillan Avenue but is focused rather clunkily on John Macmillan Brown's Lot DP sale of 1908. I would also wish to see an update on the delisting (if any) of Protected Trees in the Cashmere area within (or beyond) the RHA 8 zone, however it is defined.

My submission is that:

I would seek confirmation that homes/properties of iconic citizens (in all city RHAs) are clearly delineated in the revised City Plan—so for Cashmere, for example, "Rise Cottage" (Westenra Terrace), the Ngaio Marsh House (37 Valley Road), etc. My PDF re the Cashmere area outlines the names and addresses of a number of key cultural heritage sites/private properties (e.g. Cashmere Village Green, the Cashmere Presbyterian Church and 'Corrie', the Mackay family home in Macmillan Avenue) and urges that these are very clearly signalized. The same logic would pertain to all RHAs in Otautahi/Christchurch.

Attached Documents

Name
Bruce Harding 

Submission upon Dr Ann McEwen's PC 13 Report for Macmillan Avenue, Cashmere (1 February 2022).

As a long-standing resident and submitter to the 1995 City Plan revision hearings, and former Committee member of the now defunct Cashmere Residents' Association and SCAP Committee of the former Spreydon-Heathcote Community Board, I wish to make some constructive suggestions and also offer to appear *in personam* before a panel at a later stage of this consultation cycle. I hold various documents and files which I would be happy to supply and donate to the CCC Heritage stock (perhaps at Turanga), much of which relates to the Cashmere Village Green controversy of 1995-2000 which led to the happy outcome of the Cashmere Village Green Management Plan.

I am puzzled as to why CCC have removed the whole of Macmillan Avenue from the former Special Amenity Area 17 & 17A¹ in this new RHA, and why this document does not also identify a number of important cultural-architectural heritage properties (some outside the specific area of RH8 but sited in the wider Cashmere historic precinct) in something like a focus box.

I shall now send a running response commentary to various pages in Dr McEwan's excellent document:

- It seems odd/rather creaky or random to create Heritage Area 8 simply out of John Macmillan Brown's July 1908 subdivision zone east of Whisby Rd, when after his death in January 1935 at 35 Macmillan Avenue, 'his' end of 'his' street is excluded from the HA8 zone. Indeed, his 1915 Hurst Seager home ('Holmebank II') lies right outside that HA8 zone in a street named after him as an early land-owner and developer. Macmillan Avenue (often mis-spelt MacMillan on CCC documents) was first Macmillan Road at the east end to Whisby and the undeveloped western zone (i.e. west of Whisby Rd demarcation) was called Macmillan Track probably until after JMB's death. The reason for this cannot be a higher level of heritage intactness as Dr McEwan concedes that the 21 residential properties denote "a range of styles." There is a new Cymon Allfrey home at 18 (Clausius) and a completely modern replacement also at 16 Macmillan Ave on the site of the Mackay sisters' 'Corrie'. Homes designed by Hurst Seager and his pupil Cecil Wood (and other architects) can be found at the western end of the avenue, which escapes categorization.

¹ See Special Amenity Area 17 & 17A: Hackthorne/MacMillan[sic]/Dyers Pass: Is your property in this Special Amenity Area?' Urban Design Team, City Solutions, CCC April 2001 (leaflet). Some of the properties highlighted in that document were demolished after the 2010-11 earthquake sequence.

- I would respectfully suggest that the www.kahurumanu.co.nz/atlas site of TRONT secures the view that the site of Pukeatua is not precisely delineated as a regional marker for Cashmere.
- A typo cites Heritage NZ as “Pouhere Toanga”--TAQNGA.
- When discussing biota, the consultant (p.3) elides 2 Whisby Road and 35 Macmillan Avenue in citing the late Thelma Strongman’s 1984 book to describe Professor Macmillan Brown’s garden varietals. Mrs Leggat (as she later became) intended to describe the ‘Holmebank’ garden which is now outside Heritage Area 8. There was little noted vegetation on Sue Kennett O’Brien’s family property at 2 Whisby (now owned by Oscar Alpers).
- I would suggest that the Bibliography also includes *The Memoirs of John Macmillan Brown* (edited by Mrs Viola Notariello). (Christchurch: University of Canterbury/Whitcombe & Tombs, 1974). [UC Publication # 19: General Editor A.N. Brooks. ISBN 900302 19 3]
- On page 3 there is a failure to credit the architect Robert J. Seward (Manson, Stanton & Seward) for designing both the extension and the tower for the Cashmere Hills Presbyterian Church in 1960-61.
- On page 5 reference is made to John Dyer. The land deeds for the zone across to Governor’s Bay called the Cashmere portion “Latters Spur Road”. This should be referenced for historical accuracy.
- On page 7 it would be useful to re-check Gordon Ogilvie’s 1977 book *The Port Hills of Christchurch* and name the Rev Isitt and Mayor Tommy Taylor, whose home at 63 Dyers Pass Road (‘Whareora’) sits opposite The Green. It may not be heritage-listed but should go in my info-box in this document.
- On page 8 vague reference is made to a “bus-stop” at the Dyers Pass-Macmillan junction. This community shelter was installed as bus services ceased. It is the positive outgrowth of a large community conflict with CCC and I paid for and installed a metal plaque inside it to record this. It was intended to be a small replica of the Sign of the Bellbird exterior but Stephen Grey and a CCC design team reconfigured it most sensitively to align visually with the design values of the Presbyterian Church Hall (and church).

- I think a Heritage Building summary-box graphic, supplemental to the HA8 report, should note the existence of older 'character' properties within or outside the HA zone, including JMB's Hurst Seager home (35 Macmillan); 'Corrie' (now demolished) for the Mackay sisters (16 Macmillan); the Ngaio Marsh House at 37 Valley Road (with Sherwood Lane access); Ursula Bethell's 'Rise Cottage' in Westenra Terrace, Dean Harper's home 'Cloudsley' at 39 Macmillan, along with Norman and Enid Hardie's A-frame at 15A and doubtless others not identified by me. The Ngaio Marsh House (1906) is subject to a CCC Covenant (1999) and was originally designed by Samuel Hurst Seager and amended by the architectural practices of Guy Cotterill and Don Donnithorne. Properties at 14, 25 (Miles Warren & Maurice Mahoney), 29, 34 (Cecil Wood and later Collins, Hunt, Loveridge), 40, 43, 44 and 46 (Alan Brassington's) also seem to possess SaM-like heritage values and character 'intactness'. (I have doubtless missed some others.)
- I am not arguing for any particular outcome—merely raising a flag for the commissioner/s to cross-check why these properties were actually removed from coverage—i.e. why eastern Macmillan Avenue has been so strictly delimited in zoning Heritage Area 8 for PC13. Does any of the old SaM coverage still apply, at a lower level of protection, for properties which are sited west of the Whisby Road subdivision line of 1908? Is the logic for this new delimitation, under Plan Change 13, a policy view that character retention eastwards of the Whisby boundary line is essential as properties sited there represent the oldest Macmillan Avenue building stock? That makes sense but, if so, it needs to be better emphasized in any final document, for the better understanding of Macmillan Avenue residents.
- I notify the Council that I hereby reserve the right to appear briefly on any substantive issues arising out of the PC13 when 'in person' hearings ensue. I would send in advance and also bring with me any actual change or modification submission at that point.

Yours faithfully

(Dr) Bruce Harding
'Harwood'
34 Macmillan Avenue
Cashmere
Christchurch 8022

03/942-6832 or beharding83@gmail.com

Save time and do it online

ccc.govt.nz/haveyoursay

Have your say

Housing and Business Choice Plan Change 14 and Heritage Plan Change 13

Clause 6 of Schedule 1 Resource Management Act 1991

Before we get started we'd like to ask a few questions about you. This helps us better understand who we are hearing from.

Gender: ☒ Male ☐ Female ☐ Non-binary/another gender

Age: ☐ Under 18 years ☐ 18-24 years ☐ 25-34 years ☐ 35-49 years ☐ 50-64 years
☒ 65-79 years ☐ over 80 years

Ethnicity: ☒ New Zealand European ☐ Māori ☐ Pacific Peoples ☐ Asian
☐ Middle Eastern/Latin American/African ☐ Other European ☐ Other

* Required information

Name* BRUCE HARDING
Address* 34 Macmillan Avenue Postcode* 8022
Email beharding83@gmail.com Phone no. 03/9426832

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

Organisation's name NAT.
Your role

Trade competition and adverse effects* (select appropriate)

☐ I could / ☒ could not gain an advantage in trade competition through this submission.

If you are a person who could gain an advantage in trade competition through this submission, are you directly affected by an effect of the proposed plan change/part of the plan change that –

(a) adversely affects the environment, and

(b) does not relate to the trade competition or the effects of trade competition?

☐ Yes ☐ No

* A person who could gain an advantage in trade competition through the submission may make a submission only if you answered Yes to the above, as per clause 6(4) of Schedule 1 of the Resource Management Act 1991.

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

- ☒ I wish to speak in support of my submission on Plan Change 13
☐ I wish to speak in support of my submission on Plan Change 14
☐ I do not wish to speak.

Joint submissions (Please tick this box if you agree)

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

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

☒ Yes, I have attached extra sheets. ☐ No, I have not attached extra sheets.

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

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

Signature [Signature] Date 11 May 2023

I have emailed
in PDF to Jane
West

Have your say
Heritage Plan Change 13

cf. My PDF Submission,
Sent to Jane
West as it
would not upload onto your site.

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

(Please continue on separate sheet(s) if necessary.)

Residential Heritage Area 8 (eastern Macmillan Avenue) and the clear highlighting of historic properties in the CC's digital & online files. It is puzzling that collective character recognition (p. 24) is not maintained throughout the whole of Macmillan Avenue.

My submission is that:*

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

I would seek confirmation that ~~sets~~ homes/properties of iconic citizens are clearly delineated in the City Plan. My PDF re the Cashmere area outlines the names and addresses of key Cashmere cultural heritage sites/properties (e.g. the Ngāio Marsh House and the Cashmere Village Green) are clearly signaled).

I seek the following decision from the Council:*

(Please give precise details stating what amendments you wish to see made to the proposed Plan Change.

Please continue on separate sheet(s) if necessary.)

Clarity on the RMA 8 (Macmillan Avenue) — why is one end of the street singled out? Do the old SAM 17 & 17a Character Area overlays continue to have effect? (i.e., as per the 1996 at-seq. City Plan overlays)

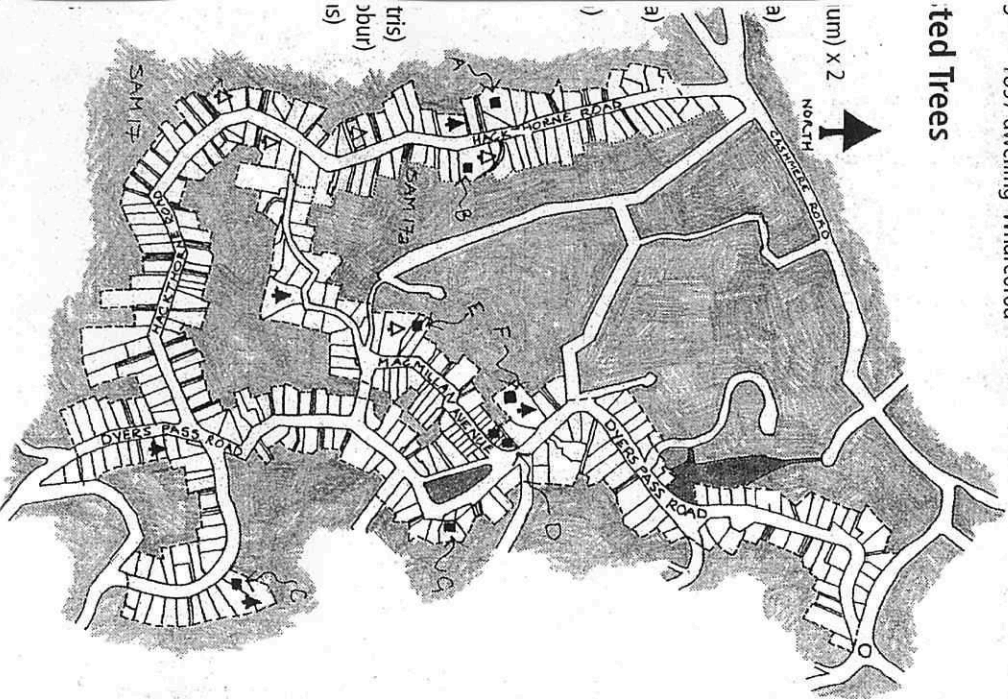
I would plan to speak to the Submission forwarded electronically to Mr West.

6 Hackthorne/MacMillan/Dyers Pass

Buildings

- 1910 two storey dwelling
- 1915 English Domestic Revival style dwelling
- 1928 two storey wooden residence
- 1929 Cashmere Hills Presbyterian Church
- 1918 wooden dwelling
- 1896 two storeyed English Domestic Revival residence
- 1897 dwelling 'Whareora'

Planted Trees

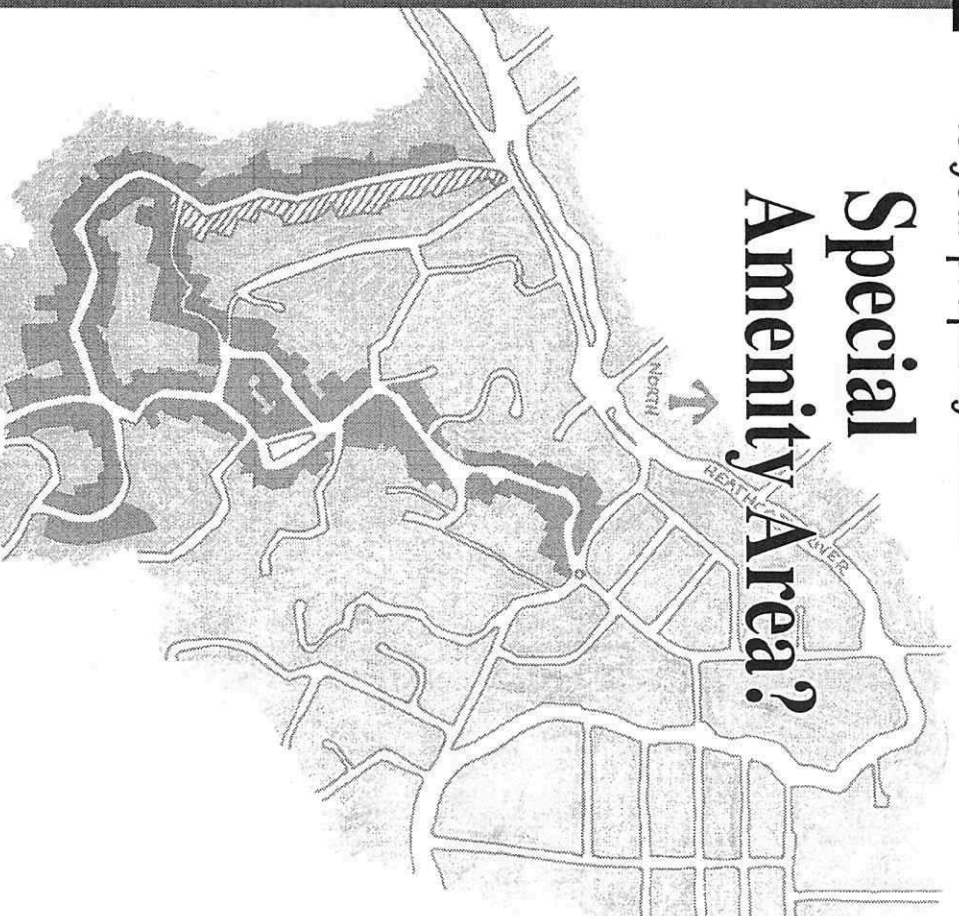


17

special amenity area

Is your property in this

Special Amenity Area?



SAM 17 & 17a

Hackthorne/MacMillan/Dyers Pass

Urban Design Team, City Solutions



CHRISTCHURCH

What is a SAM?

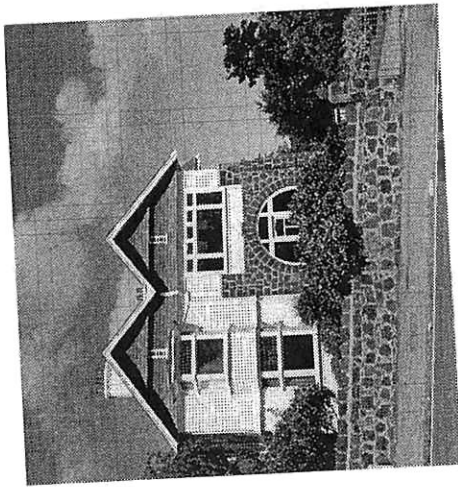
A SAM is a Special Amenity Area. These are areas within the living zones of Christchurch City that are in some way distinctive from the surrounding neighbourhoods and are considered to have a character worth retaining. Neighbours and communities need to rely on each other to help maintain this character effectively, in combination with Council initiatives.

The Character of SAM 17 & SAM 17a

SAM 17 is located in Cashmere and includes the lower reaches of some of the better known roads on Cashmere hill such as Dyers Pass Road and Hackthorne Road. SAM 17a follows the eastern side of Hackthorne Road from MacMillan Avenue to Cashmere Road.

The SAMs have a mix of housing, the majority of which was built prior to 1920. The most predominant style of housing is the English Domestic Revivalist style, characterised by the steep pitch gable main roofs, with small dormers or secondary roofs, all of which tend to be tiled. They also have weatherboard exteriors with large windows, and porches facing the street. These features are more predominant in SAM 17a than SAM 17, resulting in stronger City Plan controls in the latter SAM.

The area is also notable for the rock and stone walls and well vegetated sites, incorporating both large trees and shrub planting. Fences and hedges tend to be of a medium height, and are common. The special quality of this area is that all these elements result in an interesting landscape and streetscape with glimpses into properties and planting spilling into the street, drawn together by the common architectural elements.



Designing within this Character

New buildings in SAM 17 and SAM 17a should be designed to work with the existing character, rather than imitate it. When designing new buildings consider the position of adjoining buildings, and the way that they are placed in the landscape. Care should be taken to relate the building to the topography rather than just adjusting the site to suit the building.

Combining forms that are similar in scale and height to the existing buildings, for the overall building shape, will help maintain the area's character. A similar amount of surface texture and ornamentation should be used, but need not necessarily be weatherboards, shingled gable ends or other features from the existing buildings. Instead attention should be paid to how these add to the character of the area, and how a current method might be used to achieve this same effect.

Also consider the way that the existing buildings, and their windows and doors face the street. The use of appropriate vegetation and landscaping can emphasise these elements and increase the visual connection with the street, while still maintaining privacy. The quality and style of fencing is important as it can have a large impact on the neighbourhood. If fencing is necessary,

choose the materials and height of the fence carefully in combination with boundary planting, so that it is in keeping with the existing qualities of the street. Stone retaining walls are very much a part of the character of these older hillside suburbs and may be considered a first choice if a fence or wall is needed. Also consider alternatives to fencing and walls such as hedges, as a way to link planting with the street. 'Thinking about Fencing' – a guide to fencing alternatives, is available free from the Christchurch City Council.

Additionally, the placement of garages in the front yard can be visually detrimental and is best avoided.

City Plan Rules

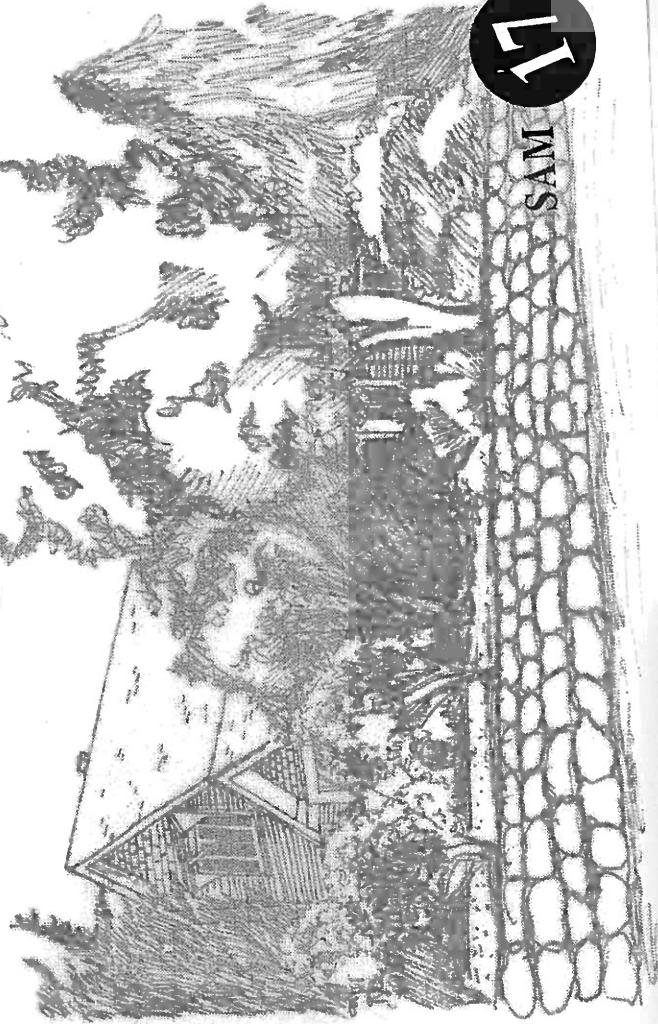
SAM 17 and SAM 17a are in the Living Hills zone in the Christchurch City Plan. The Plan contains a set of rules that regulate the way sites can be developed. There is an additional rule to the standard Living Hills rules that applies to SAM 17 and SAM 17a, which acknowledges the areas as having special qualities that should be retained. The rule below applies to both SAM 17 and SAM 17a. It is:

- **Road Setback (Streetscene)**
Road setback is the distance that a building must be set back from the front boundary. Buildings are required to be set back at least 4.5m because of the visual impact that the relationship between the buildings and their proximity to the street has on the overall character of the street.

A further rule applies to 17a only. It is:

- **External Appearance**
Resource Consent is required when an alteration to the external appearance of an existing building, or a new building, is proposed in SAM 17a, that can be seen from a public place such as the street.

If you are considering altering the external appearance of a building in SAM 17 or 17a, or building anew, and you need a Resource Consent it is recommended that you seek advice from the Urban Design Team in City Solutions of the Christchurch City Council, before submitting your application.



Our proposed Heritage Plan Change (PC13)

Submitter Details


Submission Date: 12/05/2023

First name: Jo

Last name: Appleyard

On behalf of: Lyttelton Port Company Limited

Attached Documents

Name	
LPC submission on PC13 (002)	

Form 5

**SUBMISSION ON PUBLICLY NOTIFIED PROPOSAL FOR POLICY STATEMENT OR
PLAN, CHANGE OR VARIATION***Clause 6 of Schedule 1, Resource Management Act 1991***To** Christchurch City CouncilName of submitter: Lyttelton Port Company Limited (*LPC*)

- 1 This is a submission on the proposed Heritage Plan Change to the Christchurch District Plan (*PC13*).
- 2 LPC could not gain an advantage in trade competition through this submission.
- 3 The specific provisions of PC13 that LPC's submission relates to and the general and specific reasons for LPC's submission are set out in **Appendix 1**.
- 4 LPC seeks the following decisions from the Hearings Panel on behalf of Christchurch City Council:
 - 4.1 Grant the relief as set out in **Appendix 1**; and
 - 4.2 Grant any other similar or consequential relief that would address LPC's concerns set out in this submission.
- 5 LPC wishes to be heard in support of the submission.
- 6 If others make a similar submission, LPC will consider presenting a joint case with them at a hearing.

Signed for and on behalf of Lyttelton Port Company Limited by its solicitors and authorised agents Chapman Tripp

Jo Appleyard
Partner
12 May 2023

Address for service of submitter:

Lyttelton Port Company Limited
c/- Annabelle Lee
Chapman Tripp
Level 5, PwC Centre

60 Cashel Street
PO Box 2510
Christchurch 8140
Email address: annabelle.lee@chapmantripp.com

APPENDIX 1: LPC SUBMISSION ON PC13


- 1 Lyttelton Port Company Limited (*LPC*) welcomes the opportunity to submit on the proposed Heritage Plan Change to the Christchurch District Plan (*PC13*).
- 2 LPC also notes and appreciates the consultation undertaken by Christchurch City Council (*CCC*) in its preparation of PC13.
- 3 Lyttelton Port of Christchurch (*Lyttelton Port*) is the South Island's major deep-water Port and is New Zealand's third largest container terminal by volume, after Port of Tauranga and Ports of Auckland.
- 4 Lyttelton Port is the primary international gateway for the South Island, with Christchurch being the major distribution centre for inbound goods. Export customers include a wide variety of dairy, meat, forestry, horticultural, and manufacturing businesses, as well as coal which is an important export for the west coast region.
- 5 Of relevance to PC13, the whole of Lyttelton township is identified as containing heritage values through the Lyttelton Residential Heritage Area (*LRHA*).¹ LPC supports the spatial extent of the LRHA as notified.
- 6 It is noted that the LRHA explicitly excludes Lyttelton Port and non-residential land. LPC supports this exclusion given existing Port infrastructure is largely modern in nature. Furthermore, there is a functional and operational need for certain structures in certain locations and LPC must be able to operate, maintain and upgrade Port infrastructure, as nationally significant infrastructure. It would be inappropriate for such infrastructure to be subject to the planning framework applicable to heritage items.

¹ As identified in the proposed Appendices 9.3.7.7.6, 9.3.7.8.6 and 9.3.7.9.6.

Our proposed Heritage Plan Change (PC13)

[Submitter Details](#)**Submission Date:** 12/05/2023**First name:** Mike**Last name:** Percasky**On behalf of:** Duncans Lane Limited

Attached Documents

Name
PC13 submission Duncans Lane Limited 

Form 5

SUBMISSION ON PUBLICLY NOTIFIED PROPOSAL FOR POLICY STATEMENT OR PLAN, CHANGE OR VARIATION*Clause 6 of Schedule 1, Resource Management Act 1991***To** Christchurch City Council**Name of submitter:** Duncans Lane Limited (**DLL**)

- 1 This is a submission on Plan Change 13 (**PC13**) to the Christchurch District Plan (the **Plan**).
- 2 DLL could not gain an advantage in trade competition through this submission.
- 3 DLL's submission relates to PC13 in its entirety.
- 4 DLL seeks the following decision from the local authority:
 - 4.1 The relief as set out in **Annexure A**.
 - 4.2 Any other similar relief that would address the relief sought by DLL.
 - 4.3 All necessary consequential amendments.
- 5 DLL **wishes to be heard** in support of the submission.
- 6 If others make a similar submission, DLL will consider presenting a joint case with them at a hearing.

Signed for and on behalf of Duncans Lane Limited


pp. M Percasky
12 May 2023

Address for service of submitter:

Duncans Lane Limited
c/- Novo Group Limited
Attention: J Phillips
PO Box 365
Christchurch 8013
Email: jeremy@novogroup.co.nz

ANNEXURE A

The drafting suggested in this annexure reflects the key changes the submitter seeks. Consequential amendment may also be necessary to other parts of the proposed provisions.

The submitter proposes drafting below and seeks that this drafting, or drafting with materially similar effect, be adopted by the Council.

Suggested amendments and alternative drafting is shown in track change –requested deletions are shown using ~~red strike through~~ and requested insertions are shown using red underline.


No.	Provision	Position	Submission	Relief Sought
1.	Heritage items and settings aerial map (Aerial map reference 693, Heritage item number 1432, heritage setting number 604)	Oppose	The submitter opposes the increased spatial extent of the heritage item and setting proposed (for the Duncan’s Buildings) on Aerial map reference 693 for heritage item number 1432 and heritage setting number 604. Among other reasons, the submitter is concerned at the increased costs and regulation imposed by the change relative to the benefits of the change.	Retain the existing spatial extent of the heritage item and setting for the Duncan’s Buildings as shown on Aerial map reference 693, Heritage item number 1432, heritage setting number 604.
2.	Revisions to historic heritage rules generally	Oppose	<p>The submitter is opposed to PC13 to the extent that it proposes to amend the historic heritage rules in the Plan in such a way that will be less enabling and/or will result in greater regulation or resource consent requirements for development requirements.</p> <p>The submitter is particularly concerned with proposed amendments to definitions, policies, rules, and assessment matters where such amendments will be inconsistent with:</p> <ul style="list-style-type: none"> • strategic objective 3.3.1 to ‘foster investment certainty’; and, 	Delete/reject proposed amendments to definitions, policies, rules and assessment matters in PC13 and retain the status quo in respect of these provisions.

No.	Provision	Position	Submission	Relief Sought
			<ul style="list-style-type: none"> • strategic objective 3.3.2 to '<i>minimise</i>: A. transaction costs and reliance on resource consent processes; and B. the number, extent, and prescriptiveness of development controls and design standards in the rules, in order to encourage innovation and choice; and C. the requirements for notification and written approval...'; and • heritage objective 9.3.2.1.1 to <i>enable and support</i>: 'A. the ongoing retention, use and adaptive re-use; and B. the maintenance, repair, upgrade, restoration and reconstruction; of historic heritage' 	

Our proposed Heritage Plan Change (PC13)

[Submitter Details](#)**Submission Date:** 12/05/2023**First name:** Christian**Last name:** Jordan

Attached Documents

Name	
submission to council (003)	

PC13 Submission CCC

Historic Heritage:

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

Heritage Areas:

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

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

Rationale:

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

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

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

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

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

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

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


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

Christian Jordan May 2023

Our proposed Heritage Plan Change (PC13)

[Submitter Details](#)**Submission Date:** 09/05/2023**First name:** Claire**Last name:** Coveney

Attached Documents

Name	
Claire Coveney PC13	

Have your say

Housing and Business Choice Plan Change 14 and Heritage Plan Change 13

Clause 6 of Schedule 1 Resource Management Act 1991

Before we get started we'd like to ask a few questions about you. This helps us better understand who we are hearing from.

Gender: ☐ Male ☒ Female ☐ Non-binary/another gender

Age: ☐ Under 18 years ☐ 18-24 years ☐ 25-34 years ☐ 35-49 years ☐ 50-64 years
☒ 65-79 years ☐ over 80 years

Ethnicity: ☒ New Zealand European ☐ Māori ☐ Pacific Peoples ☐ Asian
☐ Middle Eastern/Latin American/African ☐ Other European ☐ Other

* Required information

Name* Claire Coveney
Address* 13 Earl Street Opawa Postcode* 8022
Email clairecoveney@gmail.com Phone no. 0274901234

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

Organisation's name _____

Your role _____

Trade competition and adverse effects* (select appropriate)

☐ I could / ☒ could not gain an advantage in trade competition through this submission.

If you are a person who could gain an advantage in trade competition through this submission, are you directly affected by an effect of the proposed plan change/part of the plan change that –

(a) adversely affects the environment, and

(b) does not relate to the trade competition or the effects of trade competition?

☐ Yes ☒ No

* A person who could gain an advantage in trade competition through the submission may make a submission only if you answered Yes to the above, as per clause 6(4) of Schedule 1 of the Resource Management Act 1991.

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

- ☐ I wish to speak in support of my submission on Plan Change 13
☐ I wish to speak in support of my submission on Plan Change 14
☒ I do not wish to speak.

Joint submissions (Please tick this box if you agree)

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

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

☒ Yes, I have attached extra sheets. ☐ No, I have not attached extra sheets.

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

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

Signature Claire Coveney Date 9.5.23
5.9.23

Have your say

Housing and Business Choice Plan Change 14

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

(Please continue on separate sheet(s) if necessary.)

Trees.

You can't mitigate loss of large canopy trees with money.
Tree felling loses an carbon sink!
Increases heating, flooding
↓ Reduces biodiversity

My submission is that:*

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

There is a lack of commitment to protect well established older trees in our suburban areas, the older areas, especially.

There is a lack of commitment to protect our future food supply by having community gardens established & supported in every community.

I do not agree with 20% contribution fund in lieu of removing all trees. Poorer areas will suffer more heating & flooding. There is no guarantee trees can be planted from funds. Ecosystems & wildlife will disappear.

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.)

Older established trees, that are healthy and not blocking a housing area to be protected. Especially native trees. / shrubs.

Trees, especially native trees, shade trees are to be planted and maintained by Council (developers are renowned for forgetting) on every development.

no pay outs! no mitigation \$.

Developers are wealthy enough

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.)

Trees

My submission is that:*

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

We have run out of time to wait for trees to grow. Well established trees provide a great carbon sink. The council lets wealthy developers to remove trees by 20% financial contribution fund. How will the council be held accountable for each contribution, that it will go to plant trees, where they have been removed.

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.)

no financial contribution fund.
Onus on developers to retain bush & trees on the parameters of properties.
Roadside tree plantings are not viable in some of the areas undergoing medium to high density housing.

Kōrero mai

Have your say on the District Plan changes:

Housing and Business Choice

(Plan Change 14)

Heritage

(Plan Change 13)

Consultation document


Consultation closes 3 May 2023

ccc.govt.nz/haveyoursay

Our proposed Heritage Plan Change (PC13)

[Submitter Details](#)**Submission Date:** 03/05/2023**First name:** Anton**Last name:** Casutt

Attached Documents

Name
Anton Casutt submission PC13 Redaction please 

Have your say

Housing and Business Choice Plan Change 14 and Heritage Plan Change 13

Clause 6 of Schedule 1 Resource Management Act 1991

Before we get started we'd like to ask a few questions about you. This helps us better understand who we are

* Required information

Name* Anton Casutt
 Address* 9 Johnson St, Sydenham Postcode* 8023
 Email _____ Phone no. _____

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

Organisation's name _____

Your role _____

Trade competition and adverse effects* (select appropriate)

☐ I could / ☒ could not gain an advantage in trade competition through this submission.

If you are a person who could gain an advantage in trade competition through this submission, are you directly affected by an effect of the proposed plan change/part of the plan change that –

(a) adversely affects the environment, and

(b) does not relate to the trade competition or the effects of trade competition? ☐ Yes ☐ No

* A person who could gain an advantage in trade competition through the submission may make a submission only if you answered Yes to the above, as per clause 6(4) of Schedule 1 of the Resource Management Act 1991.

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

- ☒ I wish to speak in support of my submission on Plan Change 13 – don't want to speak on this
☐ I wish to speak in support of my submission on Plan Change 14
☐ I do not wish to speak.

Joint submissions (Please tick this box if you agree)

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

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

☐ Yes, I have attached extra sheets. ☒ No, I have not attached extra sheets.

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

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

Signature _____

Date _____

03/05/2023

Have your say Heritage Plan Change 13

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

(Please continue on separate sheet(s) if necessary.)

Adding Scott St Sydenham
to a Heritage or character
area

~~not a heritage area~~

My submission is that:*

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

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

Keep some of our history and building design.

I seek the following decision from the Council:*

(Please give precise details stating what amendments you wish to see made to the proposed Plan Change.

Please continue on separate sheet(s) if necessary.)

Adding Scott St Sydenham
as a Heritage or Character area.

Kōrero mai

Have your say on the **District Plan changes:**

Housing and Business Choice

(Plan Change 14)

Heritage

(Plan Change 13)

Consultation document

Consultation closes 3 May 2023

ccc.govt.nz/haveyoursay

Our proposed Heritage Plan Change (PC13)



Submitter Details

Submission Date: 12/05/2023

First name: Anne **Last name:** Dingwall

On behalf of: Christchurch Civic Trust

Attached Documents

Name	
Christchurch Civic Trust - Email	
Christchurch Civic Trust submission on PC 13 May 12 2023	
Extract from 1 March 2023 CCT Deputation to CCC on PC 13 Heritage	
Extract from 1 March 2023 CCT Deputation to CCC on PC 13 Heritage	

Mulder, Andrea

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

Dear Engagement Officer,

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

Name **Ross Gray**

Address **52A Jeffreys Rd Christchurch** Postcode **8052**

Email rosslogray@xtra.co.nz Phone no. **021 206 3620**

Responding for Christchurch Civic Trust

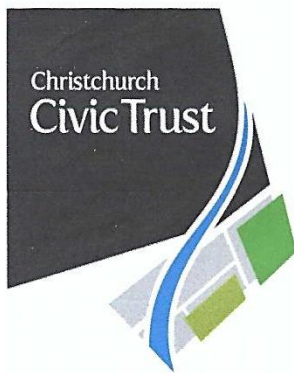
Role **Chair**

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

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

Please see PDF attachment

Ross Gray 12 May 2023



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

CHRISTCHURCH CIVIC TRUST SUBMISSION ON CCC PLAN CHANGE 13

May 12th 2023

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

INTRODUCTION

Christchurch Civic Trust (founded in 1965) Mission Statement:

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

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

1. Our Heritage Our Taonga

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

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

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

www.canterburyearthquakedemolist.weebly.com

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

3. Specific Heritage Items /Sites of concern to CCT

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

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

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

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

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

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

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

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

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

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

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

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

5. Appendices

Appendix A Hagley Park

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

The Hagley Park Management Plan 2007 clearly states:
From P3

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

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

From P22

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

(ii) Open Space

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

PART II POLICIES

From P78

2.0 OPEN SPACE COMPONENT

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

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

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

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

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

Appendix B Princess Margaret Hospital

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

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

- Second only to transport, construction and demolition (C&D) is the nation's largest producer of CO₂: manufacture of materials: concrete, steel, glass – heavy energy consumption and CO₂ emissions; heavy freight transportation (non-renewable energy consumption, CO₂ emissions). This stage is often preceded by demolition of existing structures (a part of the cycle which is also heavy in energy consumption, high CO₂ production). These structures have already been in part responsible for creating first-stage emissions as already outlined. Note that the CO₂ produced during the building of a structure 50 years ago and even up to 100 years ago is still present in the atmosphere.
- As well as the above, C&D accounts for approximately 40% of hard fill waste disposal in New Zealand refuse stations.
- What is needed in the rush to intensify housing is careful research and analysis into the environmental costs of precipitate demolition of existing buildings – dwellings, multi-block structures and public, commercial and Industrial buildings – which, with suitable remediation, are capable of meeting housing needs. Clear financial benefits can also occur with such existing buildings, which are often situated in or near the centre of the city. With suitable seismic strengthening and adaptive design work, there exists considerable capacity for the housing of individuals, families, communities. In comparison with a new build this can result in: significant reduction in emissions / energy use / landfill discharge; the achieving of a clear nett cost saving in dollar terms – not to mention retention of community and cultural capital.
- The Princess Margaret Hospital has a total floor space of 40,000m², ie 4 hectares (10 acres). This historic (if not yet heritage) structure, although earthquake damaged, would be capable of remediation and re-purposing for the housing of a significantly-sized community, while fulfilling a 'centre of local community' need. It is a long-established icon of the lower Cashmere environs and could continue in a mixed-use residential, commercial, health, cultural and social role with perfect access to Cashmere High School, Pioneer Stadium and numerous easily accessible outdoor recreation and pursuits opportunities.
- CCT offers the suggestion that Ngāi Tahu, as tangata whenua, be invited to explore the idea of establishing a new marae on this site, possibly even within the building. This could also greatly enrich the community itself.
- Efficient existing public transport servicing and plentiful on-site parking are also attractive components of this adaptive reuse proposition.

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

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

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

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



By FELICITY PRICE

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

In July 1973, "The Press" printed a picture of fourth- form pupils of Avonside Girls' High School standing in front of Englefield, with a caption saying that the girls had "saved the old house from being demolished to make way for a motorway."

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

When first spoken to yesterday about the 1973 undertaking the Mayor (Mr H. G. Hay), said he had never heard of it. He was not the only one. Although the original story about the schoolgirls' petition and the council's consequent promise was originally recorded in "The Press", it was a Cash- mere reader, Mr A. D. Thomson, who brought it to our attention this week.

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

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

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

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

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

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

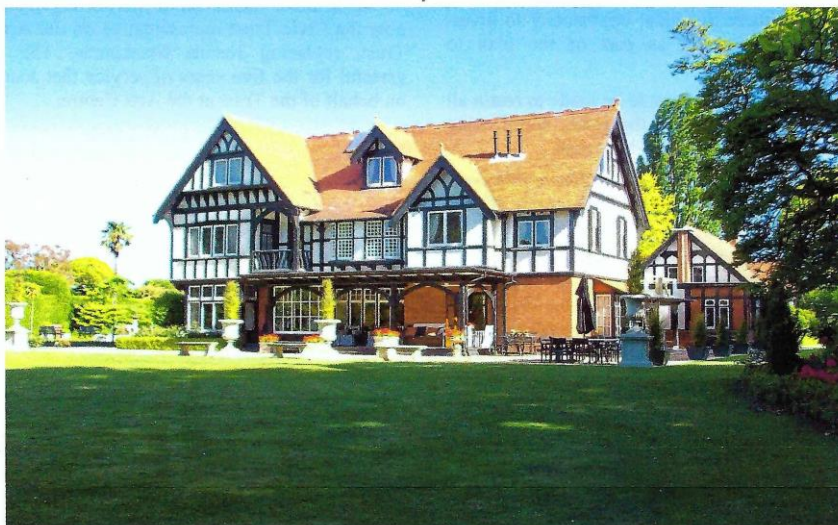
The petitioners from Avonside Girls' High School outside Englefield in 1973.



Newsletter

NOVEMBER 2010

CIVIC TRUST AWARDS



Daresbury, 67 Fendalton Rd - Awarded a Supreme Award

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



Newsletter

NOVEMBER 2010

CIVIC TRUST AWARDS



Daresbury, 67 Fendalton Rd - Awarded a Supreme Award

Our proposed Heritage Plan Change (PC13)

Submitter Details

Submission Date: 12/05/2023



First name: Faye

Last name: Collins

On behalf of:

Waipuna Halswell-Hornby-Riccarton Community Board

Attached Documents

Name	
Waipuna Halswell-Hornby Riccarton Community Board PC13- email	
Final - Draft Heritage Plan Change 13 Submission	

Mulder, Andrea

From: Collins, Faye
Sent: Friday, 12 May 2023 4:17 pm
To: Engagement
Cc: Broughton, Helen
Subject: WAIPUNA HALSWELL HORNBY RICcarton SUBMISSION ON PLAN CHANGE 13
Attachments: Final - Draft Heritage Plan Change 13 Submission.pdf

Good afternoon,

Please find attached the community Board's submission on Plan Change 13 -Heritage.

Faye Collins**Community Board Adviser**

Comm. Governance Team (Hal-Hor-Ric)



03 941 5108



faye.collins@ccc.govt.nz



Rārākau: Riccarton Centre, 199 Clarence Street



PO Box 73022, Christchurch 8154



ccc.govt.nz



Proposed Heritage Plan Change (PC13)

Waipuna Halswell Hornby Riccarton Community Board

1 Introduction

- 1.1. The Board recognises that the proposed Heritage Plan Change (PC13) (“the Plan”) is notified alongside the Housing and Business Choice Plan Change (PC14) that aims to address population growth, housing issues, including affordability, and climate change and to bring the District Plan in line with government direction given via the National Policy Statement-Urban Development and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (“the Act”) to enable more development in the city’s existing urban footprint by allowing higher height limits within and around the city centre and suburban commercial centres.
- 1.2. The Board notes that Plan Change 13 Heritage identifies eleven proposed Residential Heritage Areas with buildings and features that are collectively significant to the city’s heritage and identity and also introduces a buffer for Residential Heritage Areas that have a high-density border, to better protect their edges. It is also proposed to add around 60 heritage buildings or items and building interiors to the Schedule of Significant Historic Heritage protected under the District Plan. As with existing scheduled buildings and items, these will require a resource consent for significant changes such as building alterations, relocation, or demolition. Both Residential Heritage Areas and additional buildings and items being added to the schedule for protection are proposed to be Qualifying Matters.

2 Submission

The Submission covers the following four aspects regarding Plan Change 13:

1. The Board is supportive of the proposal to protect residential character and heritage areas identified in the Plan, but considers there are other examples of areas with similar character to the areas proposed that should be identified in the Plan including areas of Hornby, South Hornby, Sockburn, Hei Hei, Islington, and Broomfield.
2. Support the proposed buffer between Residential Heritage Areas, bordering high density areas, but argues that a buffer is equally needed between the individual heritage buildings and items that are to be permitted in either high or medium density residential zones. The Board considers that developments of this scale could well detract from the value of these individual heritage buildings. The Board advocates for a buffer between individual heritage properties and higher or medium density developments.
3. Heritage settings need to be defined as meeting the significance threshold. The Council’s policy on heritage does not regard significant heritage settings as meeting the threshold. The Board understands other Councils do include heritage settings as being worthy of protection. (The Board will provide policies from other Councils at the hearing).

The Board considers that one example of a significant heritage setting is the foundation borough of Christchurch, Riccarton:

- The original cottage on the site is the first cottage of European settlement in Canterbury.
- Ngai Tuahiwi had a pa in the area before the Europeans arrived.
- Riccarton Bush is of National importance, as it is the only remaining example left of the indigenous forests of the plains- it is over 600 years old.
- Riccarton House is highly significant and retains its heritage interior.
- The original farm buildings.
- The historic Kahu Road bridge.
- Christchurch Boys' High School and war memorial.

In the Board's opinion a larger area could be included from Mona Vale, to the Britten stables (possible heritage) to the war memorial at Jane Deans Close (see below). In the attached Residential Heritage Area template this area meets 11 of the possible 13 criteria for a Residential Heritage area. The Board fails to understand why critical heritage settings are not seen as significant.

4. It is important to acknowledge that if this is not done the above collection of historic items and other historic settings may be engulfed by inappropriate development. WSP, (the consultancy engaged by Council) provided a drawing of three story and six story development (to be provided at a later date).

The Board recommends that significant heritage settings should be defined as meeting the significance threshold. The only suggestion the Board makes regarding preserving a heritage setting is that the zoning for housing around the setting remain at current levels, either residential suburban or residential suburban transitional density.

3 Request for an additional heritage item to be added to the list

- 3.1 The Board recommends inclusion of a war memorial, sited in Jane Deans Close, in honour of those who died in the 20th Battalion in World War 2. The 20th Battalion left from this area and served in Greece, Crete and North Africa from 1940 to 1945. A well-attended Anzac service is held at the memorial every year.
- 3.2 Jane Deans Close is named after the early Riccarton settlor and community leader, Jane Deans, who lived in Riccarton Cottage and Riccarton House with her son after the untimely death of her husband. The war memorial was erected soon after the street was formed around 1997 replacing the original 1948 memorial.
- 3.3 The Board notes that there is proposed to be a buffer between the Residential Heritage Areas bordering high-density areas. The Board agrees that a buffer for Residential Heritage Areas is needed, but argues that a buffer is equally needed between the individual heritage buildings or items and any bordering developments that are to be permitted in either high or medium residential zones. The Board considers that developments of this scale on neighbouring properties could well detrimentally impact and detract from the value of these individual heritage buildings. Therefore the Board considers that a buffer is also required between these properties and neighbouring higher or medium density developments.

4 Conclusion

4.1 The Board requests that the matters set out above in relation to Plan change 13 be taken into consideration.

The Board would like to speak to its submission.



Helen Broughton

CHAIRPERSON Waipuna Halswell-Hornby-Riccarton Community Board

Dated 12 May 2023.

Potential RHA Review Template


Area Name -

Potential RHA's review criteria	Y/N	Notes
Moderate to high degree of authenticity and integrity		
Group of inter-related historic heritage places, buildings, structures and/or sites within a geographical area with clear boundaries that together address the interconnectedness of people, place and activities.	✓	
A comprehensive, collective and integrated place with coherent heritage fabric (not fragmented).		
Contains a majority of sites/building that are of defining or contributory importance to the RHA	✓	
Predominantly developed more than 30 years ago	✓	
Associated primarily but not necessarily exclusively with residential use		
Meets the minimum size for areas (one street block, one side of street/ minimum of approx. 15 properties)	✓	
Represents and embodies at least one of the heritage values in Appendix 9.3.7.1 at a significant or highly significant level: <ul style="list-style-type: none"> • Historical and Social Significance • Cultural and Spiritual Significance • Aesthetic and Architectural Significance • Technological and Craftsmanship Significance • Contextual Significance • Archaeological and Scientific Significance 	✓	
Conveys/represents important aspects of the Christchurch District's cultural and historical themes and activities	✓	
Makes a significant contribution to the Christchurch District's sense of place and identity, and an understanding of its history and cultures.	✓	
Of heritage significance to the Christchurch District (and may also be of significance nationally or internationally)	✓	

Our proposed Heritage Plan Change (PC13)

[Submitter Details](#)**Submission Date:** 12/05/2023**First name:** Rosie**Last name:** Linterman

Attached Documents

Name	
Rosie Linterman	

From: Rosie Linterman rosie.linterman@gmail.com
Date: 12/05/2023 at 11:43:18 AM
To: rosielinterman@gmail.com

Sent from my iPad

We have lived in Beverley Street for over 40 years having purchased a very rundown property at number 36. We have continually renovated and maintained the buildings and gardens (including appearing before the urban design panel to ensure we have maintained a sympathetic style in keeping with the council intentions)

Beverley Street, owners and residents have all very proudly maintained the character of the street in their renovations and repairs as they appreciate the special characteristics of the street.

There are outstanding examples of Christchurch's best early 20th century architecture, and most houses are constructed in the same materials and style, creating a distinctive character.

The properties have garages and off street parking which is a major asset in a very narrow street.

It would be a backward step to lose the opportunity to retain a collection of houses of character, and very established gardens of an era by allowing the character overlay to be lifted and possible multi storey developments to occur. Despite its location in St Albans the street does not flood, assisted no doubt by the high foundations and considerable planting. Flooding could become a concern with multi story building and effectively no gardens.

Christchurch is concerned to retain its image as a garden city and stop the loss of greenery for health and aesthetic reasons. The retention of the character overlay would ensure that the established trees and extensive planting in Beverley Street would continue to contribute to this aim.

We request that Beverley Street be designated as a residential heritage area to protect its special characteristics, as has been the purpose under its designation as a characteristic character over the area. (previously known as a SAM)

Our proposed Heritage Plan Change (PC13)

Submitter Details



Submission Date: 22/05/2023

First name: Wynn **Last name:** Williams

Organisation: Cambridge 137 Limited

On behalf of: Lee Pee Limited

Attached Documents

Name	
Lee Pee Limited 1	
Lee Pee limited 2	

22 May 2023

Mark Stevenson
Christchurch City Council
C/- Engagement Team
Email: engagement@ccc.govt.nz
Cc: mark.stevenson@ccc.govt.nz;
megan.pearce@ccc.govt.nz

Dear Mark,

Submission on Plan Change 13 to the Christchurch District Plan

1. We act for Lee Pee Limited (**Lee Pee**). Please find **attached** to this letter a submission on Plan Change 13 to the Christchurch District Plan made by Lee Pee.
2. Our client contact is overseas based and regrettably this submission is being made late due to only having instructions to prepare and file this submission confirmed late last week.
3. Lee Pee respectfully requests that the Council exercise its powers under section 37 of the Resource Management Act 1991 to accept the submission outside of the statutory time period for filing the submission.
4. Given that the summary of decisions requested has not yet been notified (and according to the Council's website this will only occur "around June-July 2023") there is no prejudice to any party in accepting this late submission as the submission will be able to be summarised and notified with the summary of submissions in the usual manner.
5. Please contact me if you have any questions in relation to the above.

Yours faithfully
Wynn Williams



Lucy de Latour

Partner

+64 3 379 7622

lucy.delatour@wynnwilliams.co.nz

**SUBMISSION ON A NOTIFIED PROPOSAL FOR A POLICY STATEMENT OR PLAN,
CHANGE OR VARIATION CLAUSE 6 OF SCHEDULE 1 OF THE RESOURCE
MANAGEMENT ACT 1991**

SUBMISSION ON HERITAGE PLAN CHANGE 13

Name of Submitter: Lee Pee Limited (**LPL**)

Introduction and Summary

1. This is a submission on the Christchurch District Council (the Council's) Proposed Heritage Plan Change 13 (**PC13** or the **Plan Change**) to the Christchurch District Plan.
2. LPL could not gain an advantage in trade competition through this submission.
3. LPL **opposes** the listing of 137 Cambridge Terrace (Harley Chambers) in **Appendix 9.3.7.2** 'Schedule of Significant Historic Heritage' and seeks **deletion** of 137 Cambridge Terrace (Harley Chambers) from the Appendix.
4. The basis for opposition is that the respective Statement of Significance for Harley Chambers bears no reality to:
 - a. the condition of the building,
 - b. its seismic risk, and that
 - c. any endeavours to provide any purpose or function would be both financially unsupportable and result in the removal of residual heritage fabric to the extent that the building would not warrant scheduling.
5. Accordingly, the retention of 137 Cambridge Terrace within **Appendix 9.3.7.2** is not the most appropriate way to achieve **Objective 9.3.2.1.1** and **Policy 9.3.2.2.1**, and in particular **Policy 9.3.2.2.1(c)(i)** and **(ii)** as these relate to significance, integrity, engineering and financial reasonableness.

Relief Sought

6. LPL seeks to:
 - a. **Delete** within **Appendix 9.3.7.2** 'Schedule of Significant Historic Heritage' reference to the Heritage Listing (Building and Setting) for 137 Cambridge Terrace 'Commercial Building and Setting, Harley Chambers' Item No 78 and Setting No 309.
 - b. **Delete** changes to Rule 9.3.4.1.1 (P9) and proposed deletion of P11 and P12 and Matter of Discretion 9.3.6.1 proposed by PC13.
 - c. **Consequential amendments** to the planning maps to delete the notation for Heritage Listing and Setting as above from 137 Cambridge Terrace.
7. The specific relief is provided in **Attachment A**.

8. The reasons for the submission are that unless the relief sought in this submission is granted, then PC13, with respect to the Building and Setting at 137 Cambridge Terrace, will:
 - a. Not comply with the Council's obligations under the Resource Management Act 1991 (**RMA**);
 - b. Not promote the sustainable management of natural and physical resources;
 - c. Not be the most appropriate provision in terms of the protection of historic heritage from inappropriate subdivision, use and development in accordance with section 6(f) and section 5 of the RMA;
 - d. Not amount to the and promote the efficient use and development of resources;
 - e. Be inappropriate in terms of section 32 RMA.

Background and reasons

9. Harley Chambers, 137 Cambridge Terrace is a three-level character building, with the northern portion originally dating from 1929, and the southern from 1934.
10. Until the 2011 earthquakes, the building was used for numerous small to medium size offices, primarily for medical and dental practice rooms.
11. The Canterbury earthquake sequence rendered the seismic compliance rating of the building at around 15% NBS.
12. The building has been unoccupied since February 2011, apart from a high level of vagrant and antisocial behaviour despite ongoing security efforts by the owner.
13. The building is notated as Significant in the Christchurch District Plan (Heritage notation 78 and setting 309) in the Christchurch District Plan.
14. LPL have owned Harley Chambers since 2001. LPL did not submit against the listing of Harley Chambers within the Christchurch District Plan as included as within the Stage 3 Proposal to the Christchurch District Plan.
15. LPL lodged a comprehensive resource consent to the Christchurch City Council in 2017 seeking to demolish Harley Chambers (and in connection with a partial retention of the adjoining Worcester Chambers) to facilitate a five-star Hotel complex. The application was withdrawn in 2018 given challenging world economic conditions, and the (then) staggered pace of Christchurch's recovery efforts.
16. The site location is shown on **Figure 1**. The southern elevation as taken from Worcester Boulevard is shown on **Figure 2**.

Figure 1: 137 Cambridge Terrace



Figure 2: Harley Chambers, Southern elevation. Photo facing north – Worcester Boulevard



17. Detailed assessments provided to the Council, associated with the 2017 Resource Consent application, identify the following:
Structural integrity
18. The building has been assessed to have a seismic strength of 15% NBS, and is accordingly considered to be earthquake prone having a seismic strength of less than 34% NBS.
19. Critical structural weaknesses include:
 - Unreinforced brick parapets;
 - Unreinforced brick lift shaft above second floor level (partially deconstructed)
 - Unreinforced brick and bell block exterior walls.

- Severely damaged column at the north-eastern corner.

Historic Heritage

20. Whilst there is no dispute of the pre-2011 heritage recognition of the building, overall, Harley Chambers is now only of “Some” and limited significance, given the combination of considerable alterations undertaken within the fabric of the building since its construction, the damage caused by Canterbury earthquake sequence, and also subsequent damage caused by squatters despite the considerable efforts by the building owners to exclude access.

Engineering

21. Works to ensure a robust seismic rating of 66% NBS or above are feasible in terms of engineering solutions. However, these solutions as identified are extremely invasive upon existing residual heritage fabric.

MBIE - Earthquake Prone Register

22. In December 2017 MBIE added Harley Chambers to the register of Earthquake Prone Buildings (**EPB Register**) with a recorded earthquake rating of 0% to less than 20%. The deadline for completing seismic work on the notice is 14 June 2025.

Costs of Repair (2017)

23. The costs of the structural repair of Harley Chambers to increase its seismic rating are estimated as follows: to 34% of the required New Building Standard (NBS) \$12.8 million; to 67% of NBS, \$17.070 million; and to 100% of NBS \$18.790 million.
24. In this context it is important to note that the Independent Hearings Panel on the Christchurch District Plan raised concerns with the Council’s approach to the Statements of Significance and associated listings in **Appendix 9.3.7.2**.
25. In Decision 45 which resolved the Heritage Provisions of the Christchurch District Plan, the Independent Hearings Panel (**IHP**) raised issues as to the Council’s notified provisions associated with protection of Historic Heritage¹. In particular, concern was raised as to the manner in which the notified objectives and policies did not take proper regard of the *“the impacts of the Canterbury earthquake sequence, the financial costs of repair and reconstruction of heritage items, and related to that, the engineering complexity of repair, reconstruction and seismic strengthening.”*
26. The IHP also released a Minute leading up to Decision 45². The relevant consideration to this issue is:

[17] In addition, the Council’s s32 evaluation did not involve any structured or formal evaluation, in consultation with landowners, or engineering feasibility and / or financial or economic viability issues. As we shortly address, the evidence we have heard on those matters for various submitters has informed our view that several listings should be deleted or modified. However, we have only had insight into a small sample of listings brought to our attention by submitters. Given the various considerations we have noted, this significant weakness in the listings in the Notified Proposal needs to be addressed in both policies and rules so as to ensure all landowners (whether or not submitters) will have a fair capacity for relief. We return to this matter shortly.

¹ IHP Decision 45 – Paragraph 32.

² Hearing Panel Minute Regarding Topics 9.1 – 9.5, 22 February 2016.

[18] Those problems have their consequences for the Notified Proposal. One consequence concerns the reliability or otherwise of the heritage list in the Notified Proposal, given the quality control matters we have identified...

27. Decision 45 then states:

[63] We have also included express acknowledgement that in some situations demolition of heritage items is appropriate. This is now expressly recognised in the provisions through recognition of financial and engineering factors and is consistent with our findings to s6(f), discussed at [10] – [15] above.

[99] We find that there is no statutory presumption that 'demolition' will be inappropriate, or that it requires avoidance in an absolute sense. In the Christchurch recovery context, there is a need for overall flexibility in the appropriate management of historic heritage. Policy 9.3.2.9 does not sit alone. It is one of the matters that sits under Policy 9.3.2.4. We find that the list of matters in Policy 9.3.2.9, are relevant considerations for ensuring whether demolition is appropriate. On the evidence we find the listing of these matters is particularly important for the proper consideration of applications for complex restoration or rebuilding projects involving historic heritage. As we discuss below in the context of Christchurch Cathedral, demolition can take a number of forms. It does not always mean the loss of an entire building to make way for a new and modern building. There are a range of factors that affect how much demolition is required. All of those matters are recognised in the Final Revised Version. However, we find that the policy still inappropriately framed these factors as 'exceptions', notwithstanding the Council's movement away from the phrase 'exceptional circumstances'. In the Christchurch context, we find that there should be no presumption that 'demolition' is inappropriate or that it must be avoided, or only allowed in limited circumstances.

28. The relevance of these matters to this submission is that whilst LPL did not 'test' the listings during the Proposed District Plan process by lodging a submission then, LPL with the analysis gained through its 2017 resource consent application considers that the Statement of Significance for 137 Cambridge Terrace is fundamentally flawed and cannot be justified. The inclusion of the Building on the MBIE EPB Register with seismic works or demolition to be completed by June 2025 would result in the further loss of residual heritage fabric of significance, and require an extensive and costly resource consent application. Accordingly, retaining Harley Chambers within **Appendix 9.3.7.2** cannot be considered as the more appropriate provision in terms of achieving the purpose of the RMA.

29. Accordingly, Plan Change 13 which is broadly set in terms of Historic Heritage, including the listing and delisting of a number of buildings from **Appendix 9.3.7.2** provides an appropriate mechanism whereby the Christchurch City Council, as informed by the 2017 assessment should have reconsidered and updated the technical inputs into the Schedule of Significance for 137 Cambridge Terrace, with the resultant delisting of the building and setting.

30. The purpose of this submission is to engage in the formal process to seek that delisting.

31. LPL also wishes to reserve its position to make further representations either by way of Further Submissions or should the provisions of PC13 alter or evolve through the course of the plan change process.

32. LPL wishes to be heard in support of this submission.

33. If others make a similar submission, LPL would consider presenting a joint case with them at the hearing.

DATED at Christchurch this 22nd day of May 2023



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Signature of person authorised to sign on behalf of Lee Pee Limited

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Attachment A

ID	Section of Plan	Support/ Support in Part/Oppo se	Reasons	Relief Sought																							
Chapter 9 - Appendix 9.3.7.2.																											
1.	Appendix 9.3.7.2. Schedule of Significant Historic Heritage	Oppose	As set out above. The Statement of Significance is fatally flawed and does not allow for damage and loss of function as a consequence of the Canterbury Earthquake sequence.	<table><tr><td>137</td><td>Cambridge Terrace</td><td>Central City</td><td>Commercial Building and Setting, Harley Chambers</td><td>78</td><td>309</td><td>Significant</td><td>3111</td></tr><tr><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td>Category 2</td></tr></table>								137	Cambridge Terrace	Central City	Commercial Building and Setting, Harley Chambers	78	309	Significant	3111								Category 2
137	Cambridge Terrace	Central City	Commercial Building and Setting, Harley Chambers	78	309	Significant	3111																				
							Category 2																				
2.	Proposed changes to Rule 9.3.4.1.1 (P9) and proposed deletion of P11 and P12 and Matter of Discretion 9.3.6.1	Oppose	There are several heritage buildings within Christchurch which remain significantly damaged and vacant because of the various Canterbury earthquakes. The Operative Christchurch District Plan (“Operative Plan”) specifically provided Rules and Matters of Discretion relating to the upgrade, replacement, reconstruction, restoration, alteration, and relocation of a heritage item.	Delete the PC13 proposed changes to Rule 9.3.4.1.1 (P9) and proposed deletion of P11 and P12 and Matter of Discretion 9.3.6.1.																							

ID	Section of Plan	Support/ Support in Part/Oppo se	Reasons	Relief Sought
			However, resultant of PC13, these Rules and Matters of Discretion are proposed to be deleted, or significantly altered so that the resultant effect is entirely different to that of the Operative Plan. This approach seems premature while there continue to be several significantly damaged heritage buildings within Christchurch.	
3.	Plan Maps	Oppose	Consequential amendments to Heritage notations removing the listing from Appendix 9.3.7.2.	Delete the notation of a Heritage Listing and Setting from the Planning Maps for 137 Cambridge Terrace.