Our proposed Housing and Business Choice Plan Change (14)



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SIII	hmitter	Details

Submission Date: 01/05/2023

First name: Ross Last name: Pheloung

Prefered method of contact Email

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:

This is not clear on how to submit to me and which chapter to pick Chapter 10 I chose sounds like the closest to what I am Opposing

I will just say what I think and hope it gets listened to or put into the right area for consideration

We live in Cashmere View st Somerfield and don't agree with the zone you have put us in Medium Density Residential Zone ... we need to be in Suburban/Residential Character like other areas you show in green on the zone map which I presume would protect us from Medium Density

Our street and other streets need to be protected from this Medium density zone that is proposed and protect our character housing along with other Areas/Streets with similar housing around us

Having the proposed housing would be horrible for these areas ... Developers don't care look at some areas already ... They look Horrible So don't let that happen in the good Character areas like our street and others

Also I can't believe the council planners or whoever did this plan have put these nice areas in this Medium Density Zone and see what can be built and not have a lot more of the green Suburban/Residential Character zone ... we lost enough of this character housing after the earthquakes so let's not let us lose more homes to be put into land fill like back then

There is plenty of areas already where you can have this type of Med/High Density zoning without ruining our character areas

My submission is that:

This is not clear on how to submit to me and which chapter to pick Chapter 10 I chose sounds like the closest to what I am Opposing

I will just say what I think and hope it gets listened to or put into the right area for consideration

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Also I can't believe the council planners or whoever did this plan have put these nice areas in this Medium Density Zone and see what can be built and not have a lot more of the green Suburban/Residential Character zone ... we lost enough of this character housing after the earthquakes so let's not let us lose more homes to be put into land fill like back then

There is plenty of areas already where you can have this type of Med/High Density zoning without ruining our character areas

Christchurch City Council

Our proposed Housing and Business Choice Plan Change (14)

Adding medium-density and high-density housing to an already established neighborhood is not an ideal solution for the following reasons:

I The old urban infrastructure, including power systems, domestic water and sewerage, will not be able to withstand the massive imminent population growth (next 30 years), so infrastructure improvements will be costly.

more excavations and road closures, It would be a huge investment and the money would come from the property Rates of Christchurch residents, so there was no choice but to increase the property Rates.

2 Addition to existing neighborhoods — medium and high density residential areas will mean increased concrete and asphalt footprints and reduced garden areas. This will affect the natural infiltration of rainwater or flood, and increase the burden on the drainage pipes. May cause urban flooding. There are many examples in the world, such as Beijing and Shengshou in China.

3 Over the past 100 years, the people of Christchurch, together with urban management and planners, have created a world-renowned brand - Garden City, which is now worth at least 1 billion dollars and attracts tourists from all over the world. Tourists will be disappointed if they come to 'see high-rise buildings, which is no different from Tokyo in Japan or New York in the United States. Building a brand takes decades or even a century of hard work, and destroying it can be a simple wrong decision.

Solution: Develop the urban-rural fringe around Christchurch

I. Develop the urban-rural fringe area around Christchurch, build new medium-density residential areas, and drive to the city center in 20-30 minutes. This is the ideal living and working environment.

2 The infrastructure can be planned and constructed according to the needs of the next 30 years, and the construction will not affect the traffic in the city. More importantly, these infrastructure funds will come from private investors and developers, which can reduce the financial pressure on the city council and maintain the stability of Rates. And the council can also get Rates from future new houses.

The above are some of my personal thoughts and suggestions. thanks.

gnsW.i.s

Christchurch City Council

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details					
Submission Date: First name:	01/05/2023 Damian	Last name:	Blogg		
Prefered method of contact Email					
Attached Documents					
		Name			
I object to plan change 14					

I object to plan change 14 in its entirety for the following reasons:

- The process by which the community has been consulted with has caused a general lack of understanding within the community. The documentation provided to the general public has contained numerous misleading and incorrect statements, which have resulted in a vast proportion of the community not able to understand the implications of the changes proposed.
- The proposal to increase density in certain parts of the city reflects a misguided and incorrect assumption that there is a need for the level of density proposed, when in fact there is sufficient land zoned for density increase already given the changes already made post earthquake.
- Furthermore, increases in density should be focused on the central city and around key hubs such as Riccarton or Northlands
- The proposed change has failed to take account of the nature of the existing residential environments. The complete failure of the plan change to assess effects on the residents of Christchurch is incomprehensible.
- The poorly conceived application of recession plane concepts has the potential to result in shockingly bad outcomes, and will result in (in many cases), complete loss of sunlight into dwellings and gardens. This will have hugely detrimental impacts on mental health in Christchurch, and will result in the complete loss of the ability of many inhabitants to grow vegetable and fruit gardens in Christchurch's climate.
- The complete lack of proper provision to mitigate against privacy effects is disgraceful.
- The proposal will result in significant loss of tree and garden cover throughout the city
- The proposal reflects a failure to understand how density should be correctly increased across a city
- The exemptions proposed, particularly the high accessibility exemption, is based on unsupported conclusions and presumptions. Furthermore, some of the models used contain presumptions that are inconsistent with conditions that actually exist.
- Much of the plan change documentation appears to be conceived on the incorrect premise that the change is a surety.
- There appears to be a failure to fully understand the implications of the change on the current zoning, and a lack of an assessment of how the proposal will affect existing housing stock
- The incomplete assessment carried out by the Council has resulted in proposed changes that will destroy the very character of Christchurch.
- The changes proposed do not reflect the wishes of the community and the lack of meaningful consultation is entirely undemocratic.
- The proposed changes must be rejected, as they do not reflect the community's need, nor do they properly balance the environmental, economic and social factors as required within the statutory framework.



Our proposed Housing and Business Choice Plan Change (14)

Submitter Details					
Submission Date: First name:	01/05/2023 Ann	Last name:	Clay		
Prefered method of contact Email					
Attached Documents					
Name I object to plan change 14					

I object to plan change 14 in its entirety for the following reasons:

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- The proposal to increase density in certain parts of the city reflects a misguided and incorrect assumption that there is a need for the level of density proposed, when in fact there is sufficient land zoned for density increase already given the changes already made post earthquake.
- Furthermore, increases in density should be focused on the central city and around key hubs such as Riccarton or Northlands
- The proposed change has failed to take account of the nature of the existing residential environments. The complete failure of the plan change to assess effects on the residents of Christchurch is incomprehensible.
- The poorly conceived application of recession plane concepts has the potential to result in shockingly bad outcomes, and will result in (in many cases), complete loss of sunlight into dwellings and gardens. This will have hugely detrimental impacts on mental health in Christchurch, and will result in the complete loss of the ability of many inhabitants to grow vegetable and fruit gardens in Christchurch's climate.
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- The proposal reflects a failure to understand how density should be correctly increased across a city
- The exemptions proposed, particularly the high accessibility exemption, is based on unsupported conclusions and presumptions. Furthermore, some of the models used contain presumptions that are inconsistent with conditions that actually exist.
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- The proposed changes must be rejected, as they do not reflect the community's need, nor do they properly balance the environmental, economic and social factors as required within the statutory framework.

Christchurch City Council

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details					
	01/05/2023 Jenny	Last name:	Smith		
Organisation:	Te Whare Roimata				
Prefered method of contact Email					

Attached Documents

Name

TWR Housing Bus Choice Plan 14 Appendix I

Appendix I

Te Whare Roimata HAVE YOUR SAY – HOUSING AND BUSINESS CHOICE PLAN 14

Submission 3 May 2023

Continuation Sheet

- 1) The Specific Provisions of the Plan Change that our submission relates to are as follows:
 - a. High-Density Residential Zone
 - b. Financial Contributions
 - c. Inclusionary Zoning refer Section 32 Evaluation Report Part 3:2.10 3.2.12

Continuation of Our Submission is that.....

Subsequent research by the Christchurch Methodist Mission in April 2023 on the social impact of intensification on low income people seeking affordable rental housing identified the following themes:

- intensification does not favour the poor,
- rental housing per se is not affordable across the city,
- the Inner City East is an important location where affordable housing should be available given its accessibility to services,
- an increasing trend of people over 65 struggling to afford rental housing if they reach retirement without any assets. This will be compounded by those retirees with some Kiwisaver savings being disqualified from accommodation supplement given Kiwisaver is viewed as an asset. This will mean retirees seeking rental housing will be forced to use up their Kiwisaver savings on rent,
- there are no incentives for developers to build affordable rental housing accessible to low income earners.

Left to market forces, and a hands off approach to planning intervention as favoured by the "Compact City" model which underpins Plan Change 14, the above research highlights the paradox of intensification in neighbourhoods such as the ICE/Linwood West Community who have played a pivotal role in the affordable housing chain of the city and where many essential social services and supports have been strategically located.

Intensification in these neighbourhoods comes at the expense of the existing affordable housing stock to benefit a new group of people who have a level of housing choice. This comes at the expense of a very vulnerable group. Without planning intervention the reality is the displaced group has very limited housing options and invariably risks homelessness or insecure housing.

Although housing supply has increased through intensification it has ironically limited housing choice for low income earners, insidiously eating away at the important supply of low cost rental housing in the ICE area, contributing to the unmet need of the affordable private rental housing market. Put simply intensification in the ICE area has resulted in apples being replaced by oranges – not apples. The benefits of intensification are clearly not equally shared, raising concerns about equity, fairness and a lack of choice, most keenly felt by the city's least advantaged citizens – the antithesis of what Plan Change 14 is designed to achieve.

While it is clear from numerous Council reports, Otautahi Christchurch does not have a housing capacity issue, being well positioned to meet the projected increase in demand for housing in the next 30 years, but the issue the City is facing, and will continue to face, is the declining level of housing affordability.

The growing intensification of the Inner City East / Linwood West highlights the inability of a market-led planning approach to significantly improve housing affordability for entry level homeowners and the City's least advantaged residents. Without an Inclusionary Housing Plan such as the Queenstown example, intensification exacerbates the housing poverty experienced by low income dwellers forcing them to compete against each other for whatever affordable housing there is within their existing neighbourhood or forces them out away from their friends, supports and networks. Such a process currently evident in the Inner City East/Linwood West neighbourhood undermines the strength of community and community connectedness — long been a hallmark of this area, pitting the have's against the have-not's leading to a shift in neighbourhood power dynamics with the potential for tension and conflict around different lifestyles and perspectives.

In light of the learnings from the Inner City East / Linwood West's experience of intensification we would like to see

a greater understanding of the patterns and causes of urban disadvantage so that an inclusionary approach is embraced in the City's planning process which would entwine both planning measures with interventions to support affordable housing. It would also enable planning exceptions to be made to the current uniformed approach to high density residential areas of the Inner City. This would enable communities such as the Inner City East community to be protected from further intensification for now and in the medium-term so that replacement low-cost rental housing could be built supported by a financial contribution made by developers. It would also give recognition to the vital role this community plays in supplying the city with much needed affordable housing for the City's vulnerable poor.

If we can protect residential character, heritage and our trees then it is equally essential we protect pockets of existing affordable housing for the most vulnerable. This is particularly so given housing is a fundamental human right and is the basis of stability and security for an individual or family and for a community.

- the present market-led, compact city model favoured in Plan Change 14 being replaced by the notion of the "Just City" now advanced in the literature as the means of addressing the distributive inequalities of urban growth which sees equity and urban justice put at the centre of planning decisions.
- the adoption of the American approach to urban development which requires a percentage of new developments being set aside to house low income dwellers, or the development of an Inclusionary Housing Plan into the District Plan which requires new residential developments to pay an "affordable housing financial contribution" similar to that adopted by the Queenstown Council. The money collected from this financial contribution would then be given to Community Housing providers to help fund replacement affordable housing ideally in neighbourhoods such as the Inner City East.

Our proposed Housing and Business Choice Plan Change (14)



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Su	рm	itter	D	etai	IS

Submission Date: 01/05/2023

First name: Karyn Last name: Butler

Prefered method of contact Email

Consultation Document Submissions

Provision: Chapter 1 Introduction

Seek Amendment

I seek the following decision from the Council

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

The council amend the Housing and Business Choice Plan Change 14 (PC14) from the proposed High Density Residential Zone (HRZ) in a continuous strip parallel to Papanui Road through Strowan (stretching from Papanui Road to Watford Street) to a Medium Density Residential Zone (MRZ).

The area between Watford Street and Papanui Road, Strowan, Christchurch.

My submission is that:

The council amend the Housing and Business Choice Plan Change 14 (PC14) from the proposed High Density Residential Zone (HRZ) in a continuous strip parallel to Papanui Road through Strowan (stretching from Papanui Road to Watford Street) to a Medium Density Residential Zone (MRZ).

Provision: Chapter 2 Abbreviations and Definitions

Seek Amendment

I seek the following decision from the Council

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The area between Watford Street and Papanui Road, Strowan, Christchurch.

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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 amend the Housing and Business Choice Plan Change 14 (PC14) from the proposed High Density Residential Zone (HRZ) in a continuous strip parallel to Papanui Road through Strowan (stretching from Papanui Road to Watford Street) to a Medium Density Residential Zone (MRZ).

My submission is that:

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Provision: Chapter 5 Natural Hazards

Seek Amendment

I seek the following decision from the Council

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

The council amend the Housing and Business Choice Plan Change 14 (PC14) from the proposed High Density Residential Zone (HRZ) in a continuous strip parallel to Papanui Road through Strowan (stretching from Papanui Road to Watford Street) to a Medium Density Residential Zone (MRZ).

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Provision: Chapter 6 General Rules and Procedures

Seek Amendment

I seek the following decision from the Council

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Provision: Chapter 7 Transport

Seek Amendment

I seek the following decision from the Council

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The area between Watford Street and Papanui Road - in particular the residential area of Watford Street, Christchurch.

My submission is that:

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Provision: Chapter 9 Natural and Cultural Heritage

Seek Amendment

I seek the following decision from the Council

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My submission is that:

The council amend the Housing and Business Choice Plan Change 14 (PC14) from the proposed High Density Residential Zone (HRZ) in a continuous strip parallel to Papanui Road through Strowan (stretching from Papanui Road to Watford Street) to a Medium Density Residential Zone (MRZ).

Provision: Chapter 10 Designations and Heritage Orders

Seek Amendment

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Provision: Chapter 12 Hazardous Substances and Contaminated Land

Seek Amendment

I seek the following decision from the Council

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Provision: Chapter 13 Central City

Seek Amendment

I seek the following decision from the Council

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Provision: Chapter 14 Residential

Seek Amendment

I seek the following decision from the Council

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The area between Watford Street and Papanui Road - in particular the residential area of Watford Street, Christchurch.

My submission is that:

The council amend the Housing and Business Choice Plan Change 14 (PC14) from the proposed High Density Residential Zone (HRZ) in a continuous strip parallel to Papanui Road through Strowan (stretching from Papanui Road to Watford Street) to a Medium Density Residential Zone (MRZ).

Provision: Chapter 15 Commercial

Seek Amendment

I seek the following decision from the Council

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Provision: Planning Maps

Seek Amendment

I seek the following decision from the Council

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AMENITY/CHARACTER

Relevant PC14 clause references and extracts are given in itallics:

Section 14.2.4.2 Policy – High quality, medium density residential development a Encourage innovative approaches to comprehensively designed, high quality, medium density residential development, which is attractive to residents, responsive to housing demands and reflects the planned urban built character of an area.

The proposed HRZ which is shown to be almost continuous down Papanui Road and for at least one block either side of Papanui Road is not consistent with the stated intent of this Section/Policy above and it certainly does not support '...medium density residential development, which is attractive to residents, responsive to housing demands and reflects the planned urban built character of an area'.

My specific concerns in relation to the impact of the proposed changes on the amenity/character in particular in my community of Strowan are as follows:

- the Strowan neighbourhood has an amenity character and fabric and a sense of community which is very attractive to residents, which is highly valued and worthy of retention. This is comprised of a number of elements including:
- there is still a significant proportion of older, quality homes;
- the homes are typically on larger than average sections so a sense of open space is still present;
- there are a number of prominent trees and landscaping on properties which reinforces both the perception and reality of quality open space 'around' buildings (and which clearly supports the Council's Urban Forest Plan 2023 initiative);
- new homes which have been built are typically two storey, with the scale, density and quality largely in keeping with the existing character and built form elsewhere in the Strowan community.

I urge Council to identify the area of Strowan, particularly those blocks in the vicinity of St Andrews College, as worthy of definition as an area which warrants zoning as MRZ not HRZ as proposed in PC14, as the impact on infrastructure demand and amenity values under HRZ is significantly greater than under MRZ.

- the sense of community which is present would be undermined by the scale of intensification which is proposed under HRZ;
- there are a number of prominent trees remaining in the neighbourhood which reinforces the quality of open space amenity and character of our community, and which clearly supports the Council's Urban Forest Plan 2023 initiative; but which would inevitably be threatened with the high level of intensification under HRZ as

proposed in Plan Change 14.

CHANGE FROM HRZ TO MRZ IN STROWAN – SO AS TO BE CONSISTENT WITH STATED INTENTION

Relevant PC14 clause references and extracts are:

Section 14.2.7 Objective – High Density Residential Zone

a. High density residential development near larger commercial centres, commensurate with the expected demand for housing in these areas and the nature and scale of commercial activities, community facilities, and multimodal transport networks planned or provided in the commercial centres.

Section 14.2.7.2 Policy – High density location

- a. Enable high density residential development within walking catchments of the:
- i. City centre zone;
- ii. Town Centre zones of Riccarton, Papanui, and Hornby; and
- iii. Other larger commercial centres zoned as Town Centres and Local Centres; to a degree that responds to the planned scale and nature of each centre group and the range of activities planned or provided there.

Clearly the part of Strowan proposed as HRZ does not meet these criteria as it is not located near or adjacent to a commercial centre.

I am keen to support others in my community who I know are highlighting similar concerns in their submissions.

Conclusion

I urge Council to identify the area of Strowan, particularly those blocks in the vicinity of St Andrews College, as worthy of definition as an area which warrants zoning as MRZ not HRZ as proposed in PC14, as the impact on infrastructure demand and amenity values under HRZ is significantly greater than under MRZ.

- the sense of community which is present would be undermined by the scale of intensification which is proposed under HRZ;
- there are a number of prominent trees remaining in the neighbourhood which reinforces the quality of open space amenity and character of our community, and which clearly supports the Council's Urban Forest Plan 2023 initiative; but which would inevitably be threatened with the high level of intensification under HRZ as proposed in Plan Change 14.

I am keen to support others in my community who I know are highlighting similar concerns in their submissions.

TRANSPORT

The proposed change for High Density Residential Zone (HRZ) in a continuous strip parallel to Papanui Road through Strowan (stretching from Papanui Road to Watford Street), without any requirement for new developments to provide any on-site parking, will place significant additional pressure on basic transport infrastructure such as on-street carparking and traffic congestion all of which are not coping currently.

1. INFRASTRUCTURE

Relevant PC14 clause references and extracts are given in itallics: Section 14.2.8.5 Policy – Infrastructure servicing for developments

a. Ensure that developments are serviced with all required infrastructure in an effective and efficient manner

Section 14.2.8.6 Policy – Integration and connectivity

c. Avoid significant adverse effects and remedy or mitigate other adverse effects on existing businesses, rural activities or infrastructure.

Adequate 'infrastructure' includes adequate carparking and a safe and effective transport network which does not contribute to traffic congestion.

My specific concerns in relation to the impact of the proposed changes on this

My specific concerns in relation to the impact of the proposed changes on this infrastructure in particular in my community of Strowan are as follows:

- the supply of on-street carparking spaces currently cannot keep-up with the demand for carparking, resulting in time-based (two hour maximum) parking restrictions on most surrounding streets. A major contributor to the on-street carparking issue is St Andrews' College, which defines the southeast limit of Strowan in this area. The school has a total population of around 2000 and is growing with a large waiting list for entry. The proposed change to HRZ in the Strowan community will magnify this existing, significant on-street carparking problem;
- the existing traffic management issues associated with St Andrews' College also pose a significant health and safety issue from morning and afternoon congestion in Normans Road and surrounding streets at school drop-off and pick-up times, causing delays and congestion at intersections linking with surrounding primary roads including Papanui Road and Strowan Road. All of these issues will be exacerbated by the proposed intensification of residential development in the community but especially by the proposed HRZ over many blocks.

2. LACK OF CARPARKING PROVISION FOR VULNERABLE MEMBERS OF OUR COMMUNITY

Relevant PC14 clause references and extracts are:

Section 7.2.1.2 Policy – High trip generating activities ix provide for the transport needs of people whose mobility is restricted Section 7.2.1.5 Policy – Design of Carparking areas and loading areas iii be accessible for people whose mobility is restricted At a general level, the removal of the requirements for new residential housing developments to provide for any on-site parking, will have a significant and disproportionate impact on a number of vulnerable groups in our community. These groups include

- people with disabilities;
- elderly residents; and
- families with children.

This impact will be significant on both

- existing residents and
- residents living in new developments

as increasingly they and their visitors will not be able to expect and/or rely on their ability to park close to their place of residence. This will be exacerbated significantly in the Strowan area where the current on-street carparking supply does not meet demand and this is a further reason why the proposed HRZ must not be implemented.

Our proposed Housing and Business Choice Plan Change (14)



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Submission Date: 01/05/2023

First name: Heather Last name: Woods

Prefered method of contact Email

Consultation Document Submissions

Provision: Chapter 3 Strategic Directions

Seek Amendment

I seek the following decision from the Council

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

My submission is that:

See submission attached.

Attached Documents

Name

Heather Woods submission attachment

Our proposed Housing and Business Choice Plan Change (14)



Submitter Details

Submission Date: 01/05/2023

First name: Heather Last name: Woods

Prefered method of contact Email

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:

Permit Building in ALL zones other than the Medium Density Residential zone and High Density Residential zone means as the context requires:

- a. any structure or part of a structure, whether permanent, moveable or immoveable; and/or
- b. any erection, reconstruction, placement, alteration or demolition of any structure or part of any

structure within, on, under or over the land; and

c. any vehicle, trailer, tent, marquee, shipping container, caravan or boat, whether fixed or moveable,

used on-site as a residential unit or place of business or storage.

To include Tiny Homes in the vocabulary used, because they are an extremely popular, durable, and affordable type of housing. When developed in a Hub, where they can be purchased or rented, they provide excellent community resources that elderly and disabled people especially find very comfortable, affordable, and accessible.

My submission is that:

Gives effect to Chapter 3 Strategic Directions Objectives:

Christchurch Central Recovery Plan

Medium Density Zone becomes high density

Need the availability in all areas in order to deliver on the objective of VARIETY of choice, location, type

Land Use Recovery Plan = LURP

Residential Suburban Zone

NOT ONLY Residential Suburban Density Transition Zone

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:

For the inclusion of Transportable Homes to be included in all discussions regarding housing.

This type of 2 BR housing has been proven to be durable, built within 2 weeks, priced under \$180,00,

It is easily located onto a site, and suitable for a wide range of uses. Use of this type of housing will help the objectives above to be met more quickly and easily.

My submission is that:

3.1.b.C.v. Facilitate an increase in the supply of housing, and provide for a wide range of housing types and locations, to give effect to the provisions enabling development within the National Policy Statement on Urban Development 2020 and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021;

B. ensuring that the District Plan has capacity to accommodate a minimum of 55,950 additional dwellings by 2048; and

E. providing for a wide range of housing types and locations;

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:

To permit and promote the development of Transportable Housing Community Hubs to address the statements above.

NZ has been critically short of affordable housing for many years, and traditional methods used to address this issue have been woefully inadequate.

My submission is that:

3.2.2 A city in transition

e. There is an unprecedented opportunity for this District Plan to expedite the efficient recovery and future for Christchurch as a dynamic and internationally competitive city, which meets the community's immediate and longer-term needs.

3.2.4 Longer-term population change. a. Whilst there is uncertainty about the rate of recovery and growth, on current projections Christchurch will need to accommodate and provide services for a population that is still expected to grow by approximately

130,000 people by 2041. The demographic composition of the district is also projected to change significantly during the next 30 years. Like the rest of New Zealand, the district's population is ageing. The proportion of those aged 65 years and over will increase, nearly doubling in number by 2031. b. Population growth, ageing and increasing cultural diversity will result in demands for additional housing (with a range of housing types and locations), commercial facilities and services, and infrastructure (such as transport), as well as changing the demand for community services

3.3.4 Objective - Housing bottom lines and choice a. For the period 2021-2051, at least sufficient development capacity for housing is enabled for the Ōtautahi Christchurch urban environment in accordance with the following housing bottom lines: i. short-medium term: 18,300 dwellings between 2021 and2031; and ii. long term: 23,000 dwellings between 2031 and 2051; and iii. 30 year total: 41,300 dwellings between 2021 and 2051; and b. There is a range of housing opportunities available to meet the diverse and changing population and housing needs of Christchurch residents, including: i. a choice in housing, types, densities and locations.

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:

That the CCC will accept the importance of Transportable Housing Community Hubs, which are very suited to vacant and low amenity areas, and contribute positively to local character, and sense of place and identity.

My submission is that:

6.1A Qualifying matters

6.2 Temporary Activities, Buildings and Events

iii. reinforce or promote a positive sense of place and community.

6.2.4.1.3 Restricted discretionary activities

6.2.5 Rules - Matters of discretion a. When considering applications for restricted discretionary activities, the Council's discretion to grant or decline consent, or impose conditions, is restricted to the matters over which discretion is restricted in the table in Rule 6.2.4.1.3, and as set out for that matter below.

6.2.5.1 Amenity

a. The extent to which the proposed activity will: i. contribute positively to local character, amenity values or sense of place and identity; or ii. activate otherwise vacant or low-amenity spaces.

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:

These activities should be permitted in Residential Suburban Zone to meet criteria previously stated. Also I wish for these activities to include Transportable Homes as of right in any location, and in whichever way is going to contribute to the CCC objectives of intensifying housing in greater Christchurch.

My submission is that:

14.4.1.1 Permitted activities

a. The activities listed below are permitted activities in the Residential Suburban Zone and Residential Suburban Density Transition Zone if they meet the activity specific standards set out in this table, the built form standards in Rule 14.4.2, and the area specific rules in Rule 14.4.3.

P1 Residential activity except for residential units containing more than six bedrooms, and boarding houses.

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:

To consider and accept that the use of single storey **Transportable Homes** is very important because they occupy a similar footprint to taller traditional buildings, and are therefore often more popular and suitable than the taller buildings because they do not impact on neighbours in the same way. They also offer the CHOICE that CCC espouses, and can enhance wellbeing by occupants not feeling crowded, and being unable to navigate stairs, especially due to age or disability.

My submission is that:

14.4.2.3 Building height

- a. The maximum height of any building shall be:
- i. All buildings unless specified below: 8 metres

Provision: Chapter 14 Residential

Support

I seek the following decision from the Council

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

I accept these criteria PROVIDING:

a) social housing complexes, and groups of older person's housing units where all the buildings are single storey may be developed by Community Minded Private Companies. Not just not for profit agencies and government agencies. Private Companies can provide this type of housing using transportable houses in a much more timely and cost efficient manner than

the agencies currently preferred by CCC. Community Facilities such as a Communal Hall, plus storage, yard space, clotheslines, parking would still all be provided.

My submission is that:

14.4.2.4 Site coverage

- a. The maximum percentage of the net site area covered by buildings shall be as follows:
- ii. Multi-unit residential complexes, social housing complexes, and groups of older person's housing units where all the buildings are single storey: 40%

14.4.2.5 Outdoor living space

iii. Multi-unit residential complexes, social housing complexes and older person's housing units minimum area b30m, minimum dimensions 4 metres.

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:

For CCC to permit Qualifying Sites to be located in ANY Residential Suburban zone, (not just the transitional residential suburban zone, to meet CCC criteria of a choice in housing, types, densities and locations, and so that people may stay in their preferred and familiar community areas, where they have established support networks, and ways of remaining independent based on familiarity of surroundings.

My submission is that:

14.13 Rules — Enhanced Development Mechanism

14.13.1.1 Zoning qualifying standards a. Qualifying sites shall be located in the Residential Suburban Density Transition Zone

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:

Permit this development in all Residential Suburban and Medium Density Zones.

My submission is that:

14.13.1.2 Site size qualifying standards a. Qualifying sites shall be: i. of a size greater than 1500m² and less than 10,000m²; and ii. in one continuous block of land. 14.13.1.3 Housing yield qualifying standards a. Comprehensive development of a site shall deliver a minimum density of 30 households per hectare (one unit per 330m²), and a maximum density of 65 households per hectare (one unit per 150m²).

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:

CCC TO AMEND TO READ:

A. 800 metres EDM walking distance of:

- I. A Commercial Business City Centre Zone, or Commercial Mixed use Zone.
- II. A supermarket of not less than 1000m² gross floor area except that B does not apply to EDM in the Residential Banks Peninsula Zone;
- B. 800 metres EDM walking distance of either a primary or intermediate school;
- C. 400 metres EDM walking distance of an Open Space 2 Zone or an Open Space 1 Zone that has an area greater than 4000m²;

My submission is that:

14.13.1.4 Location qualifying standards a. Accessibility criteria i. Qualifying sites shall lie fully within all of the following four criteria:

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:

WHAT I WANT CCC TO DO:

Delete this section because the zoning qualifying standards in Rule 14.13.1.1 are too restrictive.

My submission is that:

14.13.2.5 Non-complying activities

a. The activities listed below are non-complying activities. Activity NC1 Residential activities utilising the Enhanced development mechanism that do not meet zoning qualifying standards in Rule 14.13.1.1

Provision: Chapter 14 Residential

Support

I seek the following decision from the Council

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

I support this section, providing CCC is to include Transportable Homes Hubs within this criteria.

My submission is that:

14.13.3.5 Minimum unit size, and mix of units

a. The minimum net floor area (including toilets and bathrooms, but excluding parking areas, garages, or balconies) for any residential unit shall be:

Number of Bedrooms Standard i. Studio 35m2 ii. 1 bedroom 45m2 iii. 2 bedrooms 60m2

14.13.3.7 Outdoor living space

- a. For residential units with 2 or more bedrooms a minimum of 30m² of outdoor living space shall be provided on site for each residential unit, and shall not be occupied by parking areas or access. The required outdoor living space can be in a mix of private and communal areas, at the ground level.
- i. each unit shall have private outdoor living space of at least 16m² in total. The balance of the outdoor living space required for each residential unit may be provided as communal space.

Provision: Chapter 14 Residential

Support

I seek the following decision from the Council

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

I support this section, providing CCC is to include Transportable Homes Hubs within this criteria.

My submission is that:

- b. For one bedroom residential units on the ground floor a minimum of 16m² private outdoor living space with a minimum dimension of 4 metres shall be provided on site for each residential unit, and shall not be occupied by parking areas or access.
- 14.13.3.8 Service, storage and waste management spaces a. For multi-unit residential complexes and social housing complexes only: i. each residential unit shall be provided with at least 2.25m² with a minimum dimension of 1.5 metres of outdoor or indoor space at ground floor level for the dedicated storage of waste and recycling bins;
- ii. each residential unit shall be provided with at least 3m² with a minimum dimension of 1.5 metres of outdoor space at ground floor level for washing lines; and iii. the required spaces in a. and/or b. for each residential unit shall be provided either individually, or within a dedicated shared communal space.

14.13.3.12 Maximum building coverage within Enhanced development mechanism areas a. The maximum percentage of the gross area covered by buildings within developments using the Enhanced development mechanism shall be 40%.

Provision: Chapter 14 Residential

Seek Amendment

I seek the following decision from the Council

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

I want CCC to reinstate this subject. The development of this type of accommodation is vital at a time when affordable, accessible, housing is urgently needed, and there is an ageing population. This type of housing must be able to be developed by private companies who have an interest in Community Wellbeing. Not just local bodies, government, or not for profit organisations. Transportable Homes companies can provide comfortable, durable, attractive housing, in a Community Environment, for a very affordable price, and must be permitted to develop such projects in any zone. This fits with the intention of this plan change to enable a variety of locations, density, and types of housing. It also enables people to stay in their own communities, strengthening social cohesion and personal wellbeing.

My submission is that:

14.14 Community Housing Development Mechanism

Has been entirely deleted.

Our proposed Housing and Business Choice Plan Change (14)



	Detai	

Submission Date: 01/05/2023

First name: Heather Last name: Woods

Prefered method of contact Email

Consultation Document Submissions

Provision: Planning Maps

Seek Amendment

I seek the following decision from the Council

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

please see attached

My submission is that:

please see attached

Attached Documents

Name

Sub Plan Change 14 CCC 2023-05-11 Heather

SUBMISSION PLAN CHANGE 14 CHRISTCHURCH CITY COUNCIL

Heather Woods

P O Box 5201 Papanui, Christchurch 8542

phone 021 288 9618

Prefer you contact me by email: hjwoods@gmail.com.

Chapter

two definitions

Gives

effect to Chapter 3 Strategic Directions Objectives:

Christchurch

Central Recovery Plan

Medium

Density Zone becomes high density

Need

the availability in all areas in order to deliver on the objective of VARIETY of choice, location, type

Land

Use Recovery Plan = LURP

Residential

Suburban Zone

NOT

ONLY Residential Suburban Density Transition Zone

WHAT

I WANT CCC TO DO

Permit

Building in ALL zones other than the Medium Density Residential zone and High Density Residential zone means as the context requires:

a.

any structure or part of a structure, whether permanent, moveable or immoveable; and/or b.

any erection, reconstruction, placement, alteration or demolition of any structure or part of any

structure

within, on, under or over the land; and

c.

any vehicle, trailer, tent, marquee, shipping container, caravan or boat, whether fixed or moveable,

used

on-site as a residential unit or place of business or storage.

То

include Tiny Homes in the vocabulary used, because they are an extremely popular, durable, and affordable type of housing. When developed in a Hub, where they can be purchased or rented, they provide excellent community resources that elderly and disabled

people especially find very comfortable, affordable, and accessible.

Chapter

3 Strategic Directions Objectives.

3.1.b.C.v.

Facilitate an increase in the supply of housing, and provide for a wide range of housing types and locations, to give effect to the provisions enabling development within the National Policy Statement on Urban Development 2020 and the Resource Management (Enabling

Housing Supply and Other Matters) Amendment Act 2021;

B.

ensuring that the District Plan has capacity to accommodate a minimum of 55,950 additional dwellings by 2048; and

E.

providing for a wide range of housing types and locations;

WHAT

I WANT CCC TO DO

For the

inclusion of Transportable Homes to be included in all discussions regarding housing. This type

of 2 BR housing has been proven to be durable, built within 2 weeks, priced under \$180,00.

It is

easily located onto a site, and suitable for a wide range of uses. Use of this type of housing will help the objectives above to be met more quickly and easily.

3.2.2

A city in transition

e.

There is an unprecedented opportunity for this District Plan to expedite the efficient recovery and future for Christchurch as a dynamic and internationally competitive city, which meets the community's immediate and longer-term needs.

3.2.4

Longer-term population change. a. Whilst there is uncertainty about the rate of recovery and growth, on current projections Christchurch will need to accommodate and provide services for a population that is still expected to grow by approximately 130.000

people by 2041. The demographic composition of the district is also projected to change significantly during the next 30 years. Like the rest of New Zealand, the district's population is ageing. The proportion of those aged 65 years and over will increase,

nearly doubling in number by 2031. b. Population growth, ageing and increasing cultural diversity will result in demands for additional housing (with a range of housing types and locations), commercial facilities and services, and infrastructure (such as transport),

as well as changing the demand for community services

3.3.4

Objective - Housing bottom lines and choice a. For the period 2021-2051, at least sufficient development capacity for housing is enabled for the Ōtautahi Christchurch urban environment in accordance with the following housing bottom lines: i. short-medium

term: 18,300 dwellings between 2021 and2031; and ii. long term: 23,000 dwellings between 2031 and 2051; and iii. 30 year total: 41,300 dwellings between 2021 and 2051; and b. There is a range of housing opportunities available to meet the diverse and changing

population and housing needs of Christchurch residents, including: i. a choice in housing, types, densities and locations.

WHAT

I WANT CCC TO DO:

 T_{C}

permit and promote the development of Transportable Housing Community Hubs to address the statements above.

NΖ

has been critically short of affordable housing for many years, and traditional methods used to address this issue have been woefully inadequate.

6.1A

Qualifying matters

6.2

Temporary Activities, Buildings and Events

iii.

reinforce or promote a positive sense of place and community.

6.2.4.1.3

Restricted discretionary activities

6.2.5

Rules - Matters of discretion a. When considering applications for restricted discretionary activities, the Council's discretion to grant or decline consent, or impose conditions, is restricted to the matters over which discretion is restricted in the table

in Rule 6.2.4.1.3, and as set out for that matter below.

6.2.5.1

Amenity

a.

The extent to which the proposed activity will: i. contribute positively to local character, amenity values or sense of place and identity; or ii. activate otherwise vacant or low-amenity spaces.

WHAT

I WANT CCC TO DO:

That

the CCC will accept the importance of Transportable Housing Community Hubs, which are very suited to vacant and low amenity areas, and contribute positively to local character, and sense of place and identity.

6.10A

Tree Canopy Cover and Financial Contributions

6.10A.4.1Activity status tables

14.4.1.1

Permitted activities

a.

The activities listed below are permitted activities in the Residential Suburban Zone and Residential Suburban Density Transition Zone if they meet the activity specific standards set out in this table, the built form standards in Rule 14.4.2, and the area specific rules in Rule 14.4.3.

P1

Residential activity except for residential units containing more than six bedrooms, and boarding houses.

WHAT

I WANT CCC TO DO:

These

activities should be permitted in Residential Suburban Zone to meet criteria previously stated. Also I wish for these activities

to include

Transportable Homes as of right in any location, and in whichever way is going to contribute to the CCC objectives of intensifying housing in greater Christchurch.

14.4.2.3

Building height

a.

The maximum height of any building shall be:

i.

All buildings unless specified below: 8 metres

WHAT

I WANT CCC TO DO:

To

consider and accept that the use of single storey **Transportable**

Homes is very important because they occupy a similar footprint to taller traditional buildings, and are therefore often more popular and suitable than the taller buildings because they do not impact on neighbours in the same way. They also offer the CHOICE that

CCC espouses, and can enhance wellbeing by occupants not feeling crowded, and being unable to navigate stairs, especially due to age or disability.

14.4.2.4

Site coverage

a.

The maximum percentage of the net site area covered by buildings shall be as follows:

ii.

Multi-unit residential complexes, social housing complexes, and groups of older person's housing units where all the buildings are single storey: 40%

14.4.2.5

Outdoor living space

iii.

Multi-unit residential complexes, social housing complexes and older person's housing units minimum area b30m, minimum dimensions 4 metres.

WHAT

I WANT CCC TO DO:

1

accept these criteria PROVIDING:

a)

social housing complexes, and groups of older person's housing units where all the buildings are single storey may be developed by Community Minded Private Companies. Not just not for profit agencies and government agencies. Private Companies can provide this

type of housing using transportable houses in a much more timely and cost efficient manner than the agencies currently preferred by CCC. Community Facilities such as a Communal Hall, plus storage, yard space, clotheslines, parking would still all be provided

.

14.13

Rules — Enhanced Development Mechanism

14.13.1.1

Zoning qualifying standards a. Qualifying sites shall be located in the Residential Suburban Density Transition Zone

WHAT

I WANT CCC TO DO:

For

CCC to permit Qualifying Sites to be located in ANY Residential Suburban zone, (not just the transitional residential suburban zone, to meet CCC criteria of a choice in housing, types, densities and locations, and so that people may stay in their preferred and familiar community areas, where they have established support networks, and ways of remaining independent based on familiarity of surroundings.

14.13.1.2

Site size qualifying standards a. Qualifying sites shall be: i. of a size greater than 1500m² and less than 10,000m²; and ii. in one continuous block of land. 14.13.1.3 Housing yield qualifying standards a. Comprehensive development of a site shall deliver

a minimum density of 30 households per hectare (one unit per 330m²), and a maximum density of 65 households per hectare (one unit per 150m²).

WHAT

I WANT CCC TO DO:

Permit

this development in all Residential Suburban and Medium Density Zones.

14.13.1.4

Location qualifying standards a. Accessibility criteria i. Qualifying sites shall lie fully within all of the following four criteria:

CCC

TO AMEND TO READ:

Δ

800 metres EDM walking distance of:

1.

A Commercial Business City Centre Zone , or Commercial Mixed use Zone. II.

A supermarket of not less than 1000m² gross floor area - except that B does not apply to EDM in the Residential Banks Peninsula Zone;

B.

800 metres EDM walking distance of either a primary or intermediate school;

400 metres EDM walking distance of an Open Space 2 Zone or an Open Space 1 Zone that has an area greater than 4000m²;

14.13.2.5

Non-complying activities

a.

The activities listed below are non-complying activities. Activity NC1 Residential activities utilising the Enhanced development mechanism that do not meet zoning qualifying standards in Rule 14.13.1.1

WHAT

I WANT CCC TO DO:

Delete

this section because the zoning qualifying standards in Rule 14.13.1.1 are too restrictive.

14.13.3.5

Minimum unit size, and mix of units

a.

The minimum net floor area (including toilets and bathrooms, but excluding parking areas, garages, or balconies) for any residential unit shall be:

Number

of Bedrooms Standard i. Studio 35m² ii. 1 bedroom 45m² iii. 2 bedrooms 60m²

14.13.3.7

Outdoor living space

a.

For residential units with 2 or more bedrooms a minimum of 30m² of outdoor living space shall be provided on site for each residential unit, and shall not be occupied by parking areas or access. The required outdoor living space can be in a mix of private and communal areas, at the ground level.

i.

each unit shall have private outdoor living space of at least 16m² in total. The balance of the outdoor living space required for each residential unit may be provided as communal space.

WHAT I WANT CCC TO DO:

1

support this section, providing CCC is to include Transportable Homes Hubs within this criteria.

b.

For one bedroom residential units on the ground floor a minimum of 16m² private outdoor living space with a minimum dimension of 4 metres shall be provided on site for each residential unit, and shall not be occupied by parking areas or access.

14.13.3.8

Service, storage and waste management spaces a. For multi-unit residential complexes and social housing complexes only: i. each residential unit shall be provided with at least 2.25m² with a minimum dimension of 1.5 metres of outdoor or indoor space at ground

floor level for the dedicated storage of waste and recycling bins;

ii.

each residential unit shall be provided with at least 3m² with a minimum dimension of 1.5 metres of outdoor space at ground floor level for washing lines; and iii. the required spaces in a. and/or b. for each residential unit shall be provided either individually,

or within a dedicated shared communal space.

14.13.3.10

Acoustic insulation

b.

shall achieve a minimum internal to external noise reduction of 30dBA (Dtr, 2m, nT)

14.13.3.12

Maximum building coverage within Enhanced development mechanism areas a. The maximum percentage of the gross area covered by buildings within developments using the Enhanced development mechanism shall be 40%.

WHAT

I WANT CCC TO DO:

1

support this section, providing CCC is to include Transportable Homes Hubs within this criteria.

14.14

Community Housing Development Mechanism Has

been entirely deleted.

want CCC to reinstate this subject. The development of this type of accommodation is vital at a time when affordable, accessible, housing is urgently needed, and there is an ageing population. This type of housing must be able to be developed by private companies

who have an interest in Community Wellbeing. Not just local bodies, government, or not for profit organisations. Transportable Homes companies can provide

comfortable, durable, attractive housing, in a Community Environment, for a very affordable price, and

must be permitted to develop such projects in any zone. This fits with the intention of this plan change to enable a

variety of locations, density, and types of housing. It also enables people to stay in their own communities, strengthening social cohesion and personal wellbeing.

Submissions:

Chapter 14 Residential: 14.4.1.1 Permitted activities

Seek Amendment

My submission is that

Regarding 14.4.1.1 Permitted activities (Residential Suburban Zone and Residential Suburban Density Transition Zone):

I WANT CCC TO 1) To decrease the net floor area requirements of these homes such as minor dwellings (e.g. by 33%).

The current net floor area requirements are not aligned with the MDRS which has no such restrictions. The current CCC modifications to their District Plan are not sufficient.

The current net floor area requirements are not aligned with the District Plan's Objectives, i.e. there are no District Plan Objectives that justify the need for such large current net floor area requirements.

A well designed home does not need to be this large. Tiny Homes and many Transportable Homes are smaller than the current net floor area requirements, however they are fully functional spaces and are in demand by many people for their affordability and flexibility.

Therefore, the current net floor area requirements also do not meet the District Plan's Objectives, e.g. "3.3.4 Objective - Housing bottom lines and choice: b. There is a <u>range of housing opportunities</u> <u>available to meet the diverse and changing population and housing needs of Christchurch residents</u>, including: i. a <u>choice in housing</u>, <u>types</u>, <u>densities</u> and locations.".

There has indeed been a change in housing needs - house affordability has become a critical failure, and Tiny Homes and Transportable Homes have become extremely popular, however, due to antiquated restrictions like this, there is a critical shortage of land where they can be placed.

To give some examples:

A 8x3m studio unit (24sqm) is more than sufficient, still has all the amenities of a bathroom, kitchen, bedroom area and living area, and can cost under \$90,000 to build including a building consent. A 12x4m unit (48sqm) can have 2 large (3x4m) bedrooms, a full bathroom (including washing machine and dryer), and a generous kitchen (over 5 lineal meters of kitchen cabinetry), and cost under \$140,000 including a building consent.

A 14x4m unit (56sqm) can have 3 bedrooms including 2 large (3x4m) ones, a full bathroom (including washing machine and dryer), and a generous kitchen (over 5 lineal meters of kitchen cabinetry), and cost under \$160,000 including a building consent.

This becomes more clearly relevant to the MDRS as the MDRS requests smaller net floor areas, and there is no relevant justification to not allow it, the CCC District Plan Objectives call for this diversity too, so this aspect of the MDRS (smaller net floor areas) should be incorporated into PC14.

I seek the following decision from the Council

I WANT CCC TO 1) To decrease the net floor area requirements of these homes such as minor dwellings (e.g. by 33%).

Chapter 14 Residential: 14.4.1.1 Permitted activities

Seek Amendment

My submission is that

Regarding 14.4.1.1 Permitted activities (Residential Suburban Zone and Residential Suburban Density Transition Zone):

I WANT CCC TO 2) To enable the option for outdoor living spaces to be shared or partially shared with neighbouring dwellings. Or at least a portion of outdoor living spaces should be able to be satisfied by shared greenspaces.

Many younger people are not interested in the work required to maintain their own outdoor living space. They also do not see the benefit in a smaller area of exclusive use, when they could have a much larger area that is shared. Some "pocket neighbourhoods" or "co-housing" developments even have a shared entertainment area, so that this facility is still available on the more rare occasions that it is required. Therefore, there has indeed been a change in housing needs - many people are interested in the convenience and cheaper cost in having a larger shared greenspace, that might even include community gardens.

Therefore, the District Plan needs to be updated to fulfil its Objectives, e.g. "3.3.4 Objective - Housing bottom lines and choice: b. There is a <u>range of housing opportunities available to meet the diverse and changing population and housing needs of Christchurch residents</u>, including: i. a <u>choice in housing</u>. <u>types, densities</u> and locations."

It is appreciated that not all people will want this, but that is fine - enough people want it that there should be option available for it, and the market will find its own balance of how many are build to meet demand.

This becomes more clearly relevant to the MDRS in point 3) below, but in summary, the MDRS only requires outdoor living space of "Ground floor: 20 m2, 3 m dimension", and CCC has no relevant justification to not allow it, the CCC District Plan Objectives call for this diversity too, so PC14 should allow for at least a portion of outdoor living spaces should be able to be satisfied by shared greenspaces.

For example, the 20sqm outdoor living (required in theMDRS) could be required to be separate outdoor living per dwelling, but then any larger outdoor living area requirement should be allowed to be made up from shared outdoor living areas.

I seek the following decision from the Council

I WANT CCC TO 2) To enable the option for outdoor living spaces to be shared or partially shared with neighbouring dwellings. Or at least a portion of outdoor living spaces should be able to be satisfied by shared greenspaces.

Chapter 14 Residential: 14.4.1.1 Permitted activities

Seek Amendment

My submission is that

Regarding 14.4.1.1 Permitted activities (Residential Suburban Zone and Residential Suburban Density Transition Zone):

I WANT CCC TO 3) To increase the number of dwellings per 450sqm site from 2 (1x residential unit and 1x minor dwelling) to 3 as a permitted activity, as long as they are only 1 storey (or limited to 4-5m high). The current CCC modifications to their District Plan are not sufficient.

The MDRS calls for 3 dwellings per site of up to 3 storeys each. While I appreciate more than 1 storey has considerably more sunlight shading issues, 1 storey does not have these issues. Therefore, there is far less risk of introducing higher density of 1 storey dwellings into this zone.

Limiting to 1 storey would also limit the extent of intensification, so would not require such careful consideration of public transport, etc.

Combined with decreasing the net floor area requirements of these homes (e.g. by 33%), there would be enough space for 3 smaller single storey dwellings per site.

Combined with the option for shared green spaces, there would be plenty of space for 3 smaller single storey dwellings per site.

I seek the following decision from the Council

I WANT CCC TO 3) To increase the number of dwellings per 450sqm site from 2 (1x residential unit and 1x minor dwelling) to 3 as a permitted activity, as long as they are only 1 storey (or limited to 4-5m high).

Chapter 14 Residential: 14.4.2.3 Building height

Seek Amendment

My submission is that

Regarding 14.4.2.3 Building height (Residential Suburban Zone and Residential Suburban Density Transition Zone):

I WANT CCC TO 4) reduce building height to a max of 5m IF there are 3 dwellings per 450sqm site (which should also be introduced in combination with this).

The MDRS calls for 3 dwellings per site of up to 3 storeys each. While I appreciate more than 1 storey has considerably more sunlight shading issues, 1 storey does not have these issues. Therefore, there is far less risk to introducing higher density of 1 storey dwellings into this zone.

So I support the CCC approach of being far more careful about sunlight shading issues for higher density (3 dwellings per site), but these sunlight shading issues are not a concern for smaller, separate, 1 storey homes (or 5m max height).

Therefore, it seems unreasonable for CCC to reject the MRDS in its entirety in Residential Suburban Zone and Residential Suburban Density Transition Zones, when some of it (density) could be effectively incorporated as long as it did not impact on sunlight shading issues (caused by height).

Limiting to 1 storey would also limit the extent of intensification, so would not require such careful consideration of public transport, etc.

I seek the following decision from the Council

I WANT CCC TO 4) reduce building height to a max of 5m IF there are 3 dwellings per 450sqm site.

Chapter 14 Residential: 14.4.2.5 Outdoor living space

Seek Amendment

My submission is that

Regarding 14.4.2.5 Outdoor living space (Residential Suburban Zone and Residential Suburban Density Transition Zone):

I WANT CCC TO 2) To enable the option for outdoor living spaces to be shared or partially shared with neighbouring dwellings. Or at least a portion of outdoor living spaces should be able to be satisfied by shared greenspaces.

Many younger people are not interested in the work required to maintain their own outdoor living space. They also do not see the benefit in a smaller area of exclusive use, when they could have a much larger area that is shared. Some "pocket neighbourhoods" or "co-housing" developments even have a shared entertainment area, so that this facility is still available on the more rare occasions that it is required. Therefore, there has indeed been a change in housing needs - many people are interested in the convenience and cheaper cost in having a larger shared greenspace, that might even include community gardens.

Therefore, the District Plan needs to be updated to fulfil its Objectives, e.g. "3.3.4 Objective - Housing bottom lines and choice: b. There is a <u>range of housing opportunities available to meet the diverse and changing population and housing needs of Christchurch residents</u>, including: i. a <u>choice in housing</u>, <u>types</u>, <u>densities</u> and locations."

It is appreciated that not all people will want this, but that is fine - enough people want it that there should be option available for it, and the market will find its own balance of how many are build to meet demand.

This becomes more clearly relevant to the MDRS in point 3) below, but in summary, the MDRS only requires outdoor living space of "Ground floor: 20 m2, 3 m dimension", and CCC has no relevant justification to not allow it, the CCC District Plan Objectives call for this diversity too, so PC14 should allow for at least a portion of outdoor living spaces should be able to be satisfied by shared greenspaces.

For example, the 20sqm outdoor living (required in theMDRS) could be required to be separate outdoor living per dwelling, but then any larger outdoor living area requirement should be allowed to be made up from shared outdoor living areas.

I seek the following decision from the Council

I WANT CCC TO 2) To enable the option for outdoor living spaces to be shared or partially shared with neighbouring dwellings. Or at least a portion of outdoor living spaces should be able to be satisfied by shared greenspaces.

Chapter 14 Residential: 14.4.2.9 Road boundary building setback

Seek Amendment

My submission is that

Regarding 14.4.2.9 Road boundary building setback (Residential Suburban Zone and Residential Suburban Density Transition Zone):

I WANT CCC TO 6) reduce the minimum road boundary building setback from typically 4.5m to the MDRS Front yard minimum of 1.5m (height at that point is governed by the recession plane). The current CCC modifications to their District Plan are not sufficient.

As I understand it, CCC can only reject MDRS requirements if there is a valid matter of concern. There is no valid matter of concern to reject the MDRS Front yard minimum of 1.5m. Front yard setback does not affect sunlight shading as height at that point is governed by the recession plane. Front yard setback does not affect Qualifying Matters such as "Low Public Transport Accessibility Area" or "Tsunami Management Area", etc.

I seek the following decision from the Council

I WANT CCC TO 6) reduce the minimum road boundary building setback from typically 4.5m to the MDRS Front yard minimum of 1.5m (height at that point is governed by the recession plane).

Chapter 14 Residential: 14.13 Rules — Enhanced Development Mechanism

Seek Amendment

My submission is that

Regarding 14.13.1.1 Zoning qualifying standards (Enhanced Development Mechanism):

I WANT CCC TO 1) permit Qualifying Sites to be located in ANY Residential Suburban zone, (not just the Residential Suburban Density Transition Zone).

EDMs are already restricted by location in 14.13.1.4 to be close to functional services (shopping malls, Open Space Zones, Core Public Transport Routes, etc), which are far more relevant as they ensure higher functionality is available.

Therefore, there is no need to have EDMs further restricted to be in the RSDT Zone as that has no impact on the functional services available to residents.

Due to the new requirements of the MRDS to increase density, I think the EDMs needs to be modified to incorporate as much of the MRDS needs as possible without compromising the CCCs Qualifying matters.

The change requested above does not compromise the CCCs Qualifying matters, as it still ensures it is close to Core Public Transport Routes, etc.

I seek the following decision from the Council

I WANT CCC TO 1) permit Qualifying Sites to be located in ANY Residential Suburban zone, (not just the Residential Suburban Density Transition Zone).

Chapter 14 Residential: 14.13 Rules — Enhanced Development Mechanism

Seek Amendment

My submission is that

Regarding 14.13.3.5 Minimum unit size, and mix of units (Enhanced Development Mechanism):

I WANT CCC TO 2) decrease the net floor area requirements of these homes (e.g. by 33%). The current net floor area requirements are not aligned with the MDRS which has no such restrictions. The current CCC modifications to their District Plan are not sufficient.

The current net floor area requirements are not aligned with the District Plan's Objectives, i.e. there are no District Plan Objectives that justify the need for such large current net floor area requirements.

A well designed home does not need to be this large. Tiny Homes and many Transportable Homes are smaller than the current net floor area requirements, however they are fully functional spaces and are in demand by many people for their affordability and flexibility.

Therefore, the current net floor area requirements do not meet the District Plan's Objectives, e.g. "3.3.4 Objective - Housing bottom lines and choice: b. There is a <u>range of housing opportunities available to meet the diverse and changing population and housing needs of Christchurch residents</u>, including: i. a <u>choice in housing, types, densities</u> and locations."

There has indeed been a change in housing needs - house affordability has become a critical failure, and Tiny Homes and Transportable Homes have become extremely popular, however, due to antiquated restrictions like this, there is a critical shortage of land where they can be placed.

To give some examples:

A 8x3m studio unit (24sqm) is more than sufficient, still has all the amenities of a bathroom, kitchen, bedroom area and living area, and can cost under \$90,000 to build including a building consent. A 12x4m unit (48sqm) can have 2 large (3x4m) bedrooms, a full bathroom (including washing machine and dryer), and a generous kitchen (over 5 lineal meters of kitchen cabinetry), and cost under \$140,000 including a building consent.

A 14x4m unit (56sqm) can have 3 bedrooms including 2 large (3x4m) ones, a full bathroom (including washing machine and dryer), and a generous kitchen (over 5 lineal meters of kitchen cabinetry), and cost under \$160,000 including a building consent.

This becomes more clearly relevant to the MDRS as the MDRS requests smaller net floor areas, and there is no relevant justification to not allow it, the CCC District Plan Objectives call for this diversity too, so this aspect of the MDRS (smaller net floor areas) should be incorporated into PC14.

I seek the following decision from the Council

I WANT CCC TO 2) decrease the net floor area requirements of these homes (e.g. by 33%).

The current net floor area requirements are not aligned with the MDRS which has no such restrictions. The current CCC modifications to their District Plan are not sufficient.

The current net floor area requirements are not aligned with the District Plan's Objectives, i.e. there are no District Plan Objectives that justify the need for such large current net floor area requirements. A well designed home does not need to be this large. Tiny Homes and many Transportable Homes are smaller than the current net floor area requirements, however they are fully functional spaces and are in demand by many people for their affordability and flexibility.

Chapter 14 Residential: 14.13 Rules — Enhanced Development Mechanism

Seek Amendment

My submission is that

Regarding 14.13.3.7 Outdoor living space (Enhanced Development Mechanism):

I WANT CCC TO 2) To enable the option for outdoor living spaces to be shared or partially shared with neighbouring dwellings. Or at least a portion of outdoor living spaces should be able to be satisfied by shared greenspaces.

Many younger people are not interested in the work required to maintain their own outdoor living space. They also do not see the benefit in a smaller area of exclusive use, when they could have a much larger area that is shared. Some "pocket neighbourhoods" or "co-housing" developments even have a shared entertainment area, so that this facility is still available on the more rare occasions that it is required. Therefore, there has indeed been a change in housing needs - many people are interested in the convenience and cheaper cost in having a larger shared greenspace, that might even include community gardens.

Therefore, the District Plan needs to be updated to fulfil its Objectives, e.g. "3.3.4 Objective - Housing bottom lines and choice: b. There is a <u>range of housing opportunities available to meet the diverse and changing population and housing needs of Christchurch residents</u>, including: i. a <u>choice in housing</u>, <u>types</u>, <u>densities</u> and locations."

It is appreciated that not all people will want this, but that is fine - enough people want it that there should be option available for it, and the market will find its own balance of how many are build to meet demand.

This becomes more clearly relevant to the MDRS in point 3) below, but in summary, the MDRS only requires outdoor living space of "Ground floor: 20 m2, 3 m dimension", and CCC has no relevant justification to not allow it, the CCC District Plan Objectives call for this diversity too, so PC14 should allow for at least a portion of outdoor living spaces should be able to be satisfied by shared greenspaces.

For example, the 20sqm outdoor living (required in theMDRS) could be required to be separate outdoor living per dwelling, but then any larger outdoor living area requirement should be allowed to be made up from shared outdoor living areas.

I seek the following decision from the Council

I WANT CCC TO 2) To enable the option for outdoor living spaces to be shared or partially shared with neighbouring dwellings. Or at least a portion of outdoor living spaces should be able to be satisfied by shared greenspaces.

Planning Maps: Wainoni Road: Inappropriate Qualifying Matter of "Low Public Transport Accessibility Area"

Seek Amendment

My submission is that

Regarding Planning Map for Properties from 100 to 193 Wainoni Road (and further afield):

I WANT CCC TO 1) remove the Qualifying Matter of "Low Public Transport Accessibility Area" in this area from 100 to 193 Wainoni Road (and further afield), or on all roads on regular bus stops to the central city.

Bus 80 goes down Wainoni Road (all in Residential Suburban Zone), with regular bus stops on both sides of the road. Bus 80 comes every 15 minutes (e.g. 8:18am to 8:33am weekdays), from Waimari Beach to the Central City and back (https://www.metroinfo.co.nz/timetables/80-lincoln-parklands/). This seems to satisfy the need to be close to public transport that links to the central city.

For Comparison, Pages Road (running parallel to Wainoni Road), is Medium Density Residential Zone, and is also serviced by a single Bus - Bus 5, with regular bus stops on both sides of the road. Bus 5 also comes every 13 minutes (e.g. 8:32am to 8:45am weekdays), from New Brighton to the Central City and back (https://www.metroinfo.co.nz/timetables/5-rolleston-newbrighton/).

Bus 80 has the Qualifying Matter of "Low Public Transport Accessibility Area", whereas Bus 5 does not have this issue, even though it is very similar to Bus 80.

Or for another comparison:

- 38 Lyndhurst Crescent, Wainoni (Medium Density Residential Zone) to Cathedral Square at 6pm would take 31mins on Bus 5, with 12min walk. No Qualifying Matter for Public Transport.
- 183 Wainoni Road, Avondale (Residential Suburban Zone) to Cathedral Square at 6pm would take 25mins on Bus 80, with 1min walk. Or worst case, would take 32mins on Bus 5, with 14min walk.

So it makes no sense to have a Qualifying Matter of "Low Public Transport Accessibility Area" on roads that have regular bus stops to the central city. E.g. Wainoni and Keyes Road. It makes no sense with relation to the District Plan Objectives or stated purpose of Qualifying Matters, and it is not fair when compared to nearby streets with similar or worse bus routes but have no Qualifying Matter of "Low Public Transport Accessibility Area".

I seek the following decision from the Council

I WANT CCC TO 1) remove the Qualifying Matter of "Low Public Transport Accessibility Area" in this area from 100 to 193 Wainoni Road (and further afield), or on all roads on regular bus stops to the central city.

Planning Maps: Wainoni Road: "Tsunami Management Area"

Seek Amendment

My submission is that

Regarding Planning Map for Properties from 157 to 193 Wainoni Road (and further afield):

I WANT CCC TO 2) rezone this area from 157 to 193 Wainoni Road (and further afield), to "Medium Density Residential Zone" because the Qualifying Matter of "Tsunami Management Area" only applies to a small part of the properties, and is less of a risk than places like Marine Parade that are "Medium Density Residential Zone" with the Qualifying Matter of "Tsunami Management Area" applying to the whole property.

157 to 193 Wainoni Road (Residential Suburban Zone) have the Northern boundary back on to Chisnalwood School and a very minor network stream, with a small portion of the Northern boundary being lower lying. It is ONLY that small northern portion of these properties that have the Qualifying Matter of "Tsunami Management Area".

This can be proven by looking at 189 Wainoni Road that is cut in half:

- 2/189 Wainoni Road, Wainoni this is the Northern half, and is marked with the Qualifying Matter of "Tsunami Management Area".
- 1/189 Wainoni Road, Wainoni this is the Southern half, and is NOT marked with the Qualifying Matter of "Tsunami Management Area".

Compare this to areas like Marine Parade and others that are Medium Density Residential Zone, yet they have a Qualifying Matter of "Tsunami Management Area" across the entire property, and in addition, some of them have "Coastal Hazard Medium Risk Management Area".

So there are at least 2 problems with this:

- 1. Entire properties like 157 to 193 Wainoni Road should not be limited to Residential Suburban Zone based on Qualifying Matters that only apply to a small portion of their properties.
- 2. 157 to 193 Wainoni Road should be Medium Density Residential Zone, as they have less risks than existing Medium Density Residential Zones like Marine Parade and others, that not only have the risk across their whole property, but also have additional risks that 157 to 193 Wainoni Road does not have. NOTE: Public Transport is not a valid reason to limit 157 to 193 Wainoni Road as addressed earlier, this area is as good or better Public Transport than existing Medium Density Residential Zones.

I seek the following decision from the Council

I WANT CCC TO 2) rezone this area from 157 to 193 Wainoni Road (and further afield), to "Medium Density Residential Zone" because the Qualifying Matter of "Tsunami Management Area" only applies to a small part of the properties, and is less of a risk than places like Marine Parade that are "Medium Density Residential Zone" with the Qualifying Matter of "Tsunami Management Area" applying to the whole property.

Planning Maps: Wainoni Road: "Water body Setback"

Seek Amendment

My submission is that

Regarding Planning Map for Properties from 135 to 185 Wainoni Road (and further afield):

I WANT CCC TO 3) rezone this area from 135 to 185 Wainoni Road (and further afield), to "Medium Density Residential Zone" because the Qualifying Matter of "Water body Setback" only applies to a very small (5m wide) part of the properties, and is less of a risk than places like Marine Parade that are "Medium Density Residential Zone" with the Qualifying Matter of "Coastal Hazard Medium Risk Management Area" applying to the whole property.

135 to 185 Wainoni Road (Residential Suburban Zone) have the Northern boundary back on to a very small Network Stream, that the District Plan states should have a setback of 5m. The rest of the property unaffected by this setback is typically about 65m long.

Therefore, it does not seem fair to restrict all of these entire properties to Residential Suburban Zone when only 5m out of 65m is affected.

The Water body Setback is already protected by the 5m setback from the District Plan, and with good design, could be maximised and appreciated as an outdoor living greenspace, even in, or particularly in Medium Density Residential use.

The Water body Setback does not pose much of a flooding risk, as it is intended to actually mitigate flooding risk by draining flood waters away. If there is any flood risk, it is limited to the low area beside the Network Stream, otherwise it would be marked as "Floodplain Hazard Management Area", which it is not.

NOTE: Public Transport is not a valid reason to limit 157 to 193 Wainoni Road - as addressed earlier, this area is as good or better Public Transport than existing Medium Density Residential Zones.

I seek the following decision from the Council

I WANT CCC TO 3) rezone this area from 135 to 185 Wainoni Road (and further afield), to "Medium Density Residential Zone" because the Qualifying Matter of "Water body Setback" only applies to a very small (5m wide) part of the properties, and is less of a risk than places like Marine Parade that are "Medium Density Residential Zone" with the Qualifying Matter of "Coastal Hazard Medium Risk Management Area" applying to the whole property.

Planning Maps: Wainoni Road: Should be MDRZ based on Enhanced Development Mechanism criteria

Seek Amendment

My submission is that

Regarding Planning Map for Properties from ~100 to ~300 Wainoni Road (and further afield):

I WANT CCC TO 4) rezone this area from ~100 to ~300 Wainoni Road (and further afield), to "Medium Density Residential Zone" because it is close to all required amenities - closer than many other areas that are already "Medium Density Residential Zone".

It should be recognised that ~100 to ~300 Wainoni Road is close to all required amenities. The MDRS does not have such a good amenities list as the CCC District Plan 14.13 Enhanced Development Mechanism (EDM), which we will use as a comparison that passes on all 4 tests:

- 800 metres EDM walking distance of a supermarket: Yes, using Pak n Save Wainoni.
- 800 metres EDM walking distance of either a primary or intermediate school: Yes, using Chisnallwood Intermediate.
- 400 metres EDM walking distance of an Open Space Zone that has an area greater than 4000m²: Yes, using either Shortland Playground (6200sqm), or Wainoni Park (54,000sqm)
- 600 metres EDM walking distance of an EDM core public transport route: Yes, Bus route 80 travels down the full length of Wainoni Road
 (https://www.metroinfo.co.nz/timetables/80-lincoln-parklands/).

This can be compared to areas like around Niagara Street, Wainoni, which are "Medium Density Residential Zone", but pass only 1 of the 4 EDM tests above: No close supermarket, No close school, No close Open Space Zone, has a close Bus Route.

Combined with previous issues discussed about Qualifying Matters being less than or equal to proposed "Medium Density Residential Zones", there is a strong case that Properties from ~100 to ~300 Wainoni Road (and further afield) should also be "Medium Density Residential Zone".

I seek the following decision from the Council

I WANT CCC TO 4) rezone this area from ~100 to ~300 Wainoni Road (and further afield), to "Medium Density Residential Zone" because it is close to all required amenities - closer than many other areas that are already "Medium Density Residential Zone".

Planning Maps: Keyes Road: Inappropriate Qualifying Matter of "Low Public Transport Accessibility Area"

Seek Amendment

My submission is that

Regarding Planning Map for Properties for all of Keyes Road (and further afield):

I WANT CCC TO 5) remove the Qualifying Matter of "Low Public Transport Accessibility Area" on all of Keyes Road (and further afield), or on all roads on regular bus stops to the central city. Bus 60 goes down Keyes Road (most of which is in Residential Suburban Zone), with regular bus stops on both sides of the road. Bus 60 comes every 15minutes, from New Brighton to the Central City and back (https://www.metroinfo.co.nz/timetables/60-hillmorton-southshore/). This seems to satisfy the need to be close to public transport that links to the central city.

For Comparison, Marine Parade (even North of Rawhiti Domain), is Medium Density Residential Zone, and is also serviced by a single Bus - Bus 135, with regular bus stops on both sides of the road. Bus 135 also comes much less frequently - every 60 minutes (e.g. 7:45am to 8:45am weekdays), from New Brighton to the Palms - it does NOT go to the central city (https://www.metroinfo.co.nz/timetables/135-new-brighton-the-palms/).

Bus 60 has the Qualifying Matter of "Low Public Transport Accessibility Area", whereas Bus 135 does not have this issue, even though it has far lower "Public Transport Accessibility" than Bus 80. Or for another comparison:

- <u>17 Tonks Street, New Brighton (Medium Density Residential Zone) to Cathedral Square</u> at 6pm would take 41mins on Bus 60, with 12min walk. No Qualifying Matter for Public Transport.
- 270 Keyes Road, New Brighton (Residential Suburban Zone) to Cathedral Square at 6pm would take 31mins on Bus 60, with 1min walk. Or worst case, would take 35mins on Bus 5, with 12min walk. Both options are better than 17 Tonks Street.

So it makes no sense to have a Qualifying Matter of "Low Public Transport Accessibility Area" on roads that have regular bus stops to the central city. E.g. Wainoni and Keyes Road. It makes no sense with relation to the District Plan Objectives or stated purpose of Qualifying Matters, and it is not fair when compared to nearby streets with similar or worse bus routes but have no Qualifying Matter of "Low Public Transport Accessibility Area".

I seek the following decision from the Council

I WANT CCC TO 5) remove the Qualifying Matter of "Low Public Transport Accessibility Area" on all of Keyes Road (and further afield), or on all roads on regular bus routes to the central city.

Planning Maps: Keyes Road: "Tsunami Management Area"

Seek Amendment

My submission is that

Regarding Planning Map for Properties for the Residential Suburban portion of Keyes Road (and further afield):

I WANT CCC TO 6) rezone the Residential Suburban portion of Keyes Road, to "Medium Density Residential Zone" because the Qualifying Matter of "Tsunami Management Area" is not sufficient risk by itself as it is less of a risk than places like Marine Parade and 286 to 388 Keyes Road that are "Medium Density Residential Zone" with the Qualifying Matter of "Tsunami Management Area" and also "Coastal Hazard Medium Risk Management Area" applying to the whole property.

NOTE: Public Transport is not a valid reason to limit Keyes Road - as addressed earlier, this area is as good or better Public Transport than existing Medium Density Residential Zones.

I seek the following decision from the Council

I WANT CCC TO 6) rezone the Residential Suburban portion of Keyes Road, to "Medium Density Residential Zone" because the Qualifying Matter of "Tsunami Management Area" is not sufficient risk by itself as it is less of a risk than places like Marine Parade and 286 to 388 Keyes Road that are "Medium

Density Residential Zone" with the Qualifying Matter of "Tsunami Management Area" and also "Coastal Hazard Medium Risk Management Area" applying to the whole property.

Christchurch City Council

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 01/05/2023

First name: Charles Last name: Etherington

Prefered method of contact Email

Attached Documents

Name

City Plan Change 14 for Housing Intensification 2023 Submission Opposing

Our proposed Housing and Business Choice Plan Change (14)



Submitter Details

Submission Date: 01/05/2023

First name: Kaye Last name: Thomson

Prefered method of contact Postal

Consultation Document Submissions

Provision: Chapter 14 Residential

Oppose

I seek the following decision from the Council

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

My submission is that:

I oppose the HIGH DENSITY proposals for Paparoa st because,

1/Paparoa St is beyound quick walking distance from Northlands mall, impactable to carry a weekly grocery supply that far. Decision sought Propose the demarcation of High Density Residential Zone to be redrawn much closer to Northlands Mall, so walking to shops is practical and achievable.

2/Submission: Apartment dwellers are attracted to a lively urban environment with a lively cafe and entertainment precinct nearby. I do not think Paparoa St would meet the ideal site that would attract people to buy an apartment here. This is likely to lead to empty apartments. Decision Sought: Maintain Paparoa St as a family friendly street with space and gardens that specifically attracted me to purchase here in 2015.

3/Re zoning Paparoa street is unnecessary, because there are large tracts of land in CHCH already zoned High density residential land that are sitting undeveloped in sites close to or in the city centre, or close to busy hubs with cafe/restaurants, quick park access plus amenities that should be developed and populated. Submission: Already High Density zoned land available in more appropriate locations likely to attract apartment dwellers.

4/From what I understand of the proposal, High Density Residential Zoning could severely restrict my ability to enjoy my property and for it to hold its value. I bought and invested a substantial amount of money to upgrade my property post quake damage. High Density Zone does not qualify for sunlight restriction effects to my property to be taken into consideration for any proposed build on my boundary. Having a multilevel apartment block(s) on my boundary would severely restrict the sunlight reaching my home and thus severely restrict my ability to enjoy my home and for it to hold its value. Submission: Re move the High density re zoning to allow residents to enjoy the peaceful environment that attracted us to purchase & live here and maintain our property value.

Thankyou for considering my objections.

Regards.

Kaye Thomson

Our proposed Housing and Business Choice Plan Change (14)



Submitter Details

Submission Date: 01/05/2023

First name: Marie Last name: Mullins

Prefered method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Support

I seek the following decision from the Council

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

Mebo Family Trust is the part equitable owner of a property situated at 18 Kauri Street, Riccarton, Christchurch. The Trusts supports the zoning of the property as medium density. The property has to qualifying matters which it does not support. The first is that a small part of the property is said to be within the 50 DBA Airport noise contour, and that is a qualifying matter which apparently would not enable any increase in development beyond the existing zone, which is not medium density. The Trust does not support the use of an airport noise contour line that goes through a small part of a property. Given the small portion of line on the property, it should be redrawn so as to exclude the property in its entirety, or otherwise the use of the line needs to be challenged. The second qualifying matter is said to be the Riccarton Bush qualifying matter which restricts building height on the land to 8 m. The Trust intends to build a retirement home on the site and although it will comply with the 8 m height restriction, it would wish to be heard if there was a different position taken by other submitters. In other words, it would not want (as a minimum) any further restrictions imposed on the property than are currently proposed by PC 14.

My submission is that:

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Our proposed Housing and Business Choice Plan Change (14)



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Submission Date: 01/05/2023

First name: Andrew Last name: Butler

Prefered method of contact Email

Consultation Document Submissions

Provision: Chapter 1 Introduction

Seek Amendment

I seek the following decision from the Council

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

The council amend the Housing and Business Choice Plan Change 14 (PC14) from the proposed High Density Residential Zone (HRZ) in a continuous strip parallel to Papanui Road through Strowan (stretching from Papanui Road to Watford Street) to a Medium Density Residential Zone (MRZ).

The area between Watford Street and Papanui Road - in particular the residential area of Watford Street, Christchurch.

My submission is that:

The council amend the Housing and Business Choice Plan Change 14 (PC14) from the proposed High Density Residential Zone (HRZ) in a continuous strip parallel to Papanui Road through Strowan (stretching from Papanui Road to Watford Street) to a Medium Density Residential Zone (MRZ).

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 amend the Housing and Business Choice Plan Change 14 (PC14) from the proposed High Density Residential Zone (HRZ) in a continuous strip parallel to Papanui Road through Strowan (stretching from Papanui Road to Watford Street) to a Medium Density Residential Zone (MRZ).

My submission is that:

The council amend the Housing and Business Choice Plan Change 14 (PC14) from the proposed High Density Residential Zone (HRZ) in a continuous strip parallel to Papanui Road through Strowan (stretching from Papanui Road to Watford Street) to a

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:

The council amend the Housing and Business Choice Plan Change 14 (PC14) from the proposed High Density Residential Zone (HRZ) in a continuous strip parallel to Papanui Road through Strowan (stretching from Papanui Road to Watford Street) to a Medium Density Residential Zone (MRZ).

My submission is that:

The council amend the Housing and Business Choice Plan Change 14 (PC14) from the proposed High Density Residential Zone (HRZ) in a continuous strip parallel to Papanui Road through Strowan (stretching from Papanui Road to Watford Street) to a Medium Density Residential Zone (MRZ).

Provision: Chapter 7 Transport

Seek Amendment

I seek the following decision from the Council

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

The council amend the Housing and Business Choice Plan Change 14 (PC14) from the proposed High Density Residential Zone (HRZ) in a continuous strip parallel to Papanui Road through Strowan (stretching from Papanui Road to Watford Street) to a Medium Density Residential Zone (MRZ).

My submission is that:

The council amend the Housing and Business Choice Plan Change 14 (PC14) from the proposed High Density Residential Zone (HRZ) in a continuous strip parallel to Papanui Road through Strowan (stretching from Papanui Road to Watford Street) to a Medium Density Residential Zone (MRZ).

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:

The council amend the Housing and Business Choice Plan Change 14 (PC14) from the proposed High Density

Residential Zone (HRZ) in a continuous strip parallel to Papanui Road through Strowan (stretching from Papanui Road to Watford Street) to a Medium Density Residential Zone (MRZ).

My submission is that:

The council amend the Housing and Business Choice Plan Change 14 (PC14) from the proposed High Density Residential Zone (HRZ) in a continuous strip parallel to Papanui Road through Strowan (stretching from Papanui Road to Watford Street) to a Medium Density Residential Zone (MRZ).

Provision: Chapter 12 Hazardous Substances and Contaminated Land

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 amend the Housing and Business Choice Plan Change 14 (PC14) from the proposed High Density Residential Zone (HRZ) in a continuous strip parallel to Papanui Road through Strowan (stretching from Papanui Road to Watford Street) to a Medium Density Residential Zone (MRZ).

My submission is that:

The council amend the Housing and Business Choice Plan Change 14 (PC14) from the proposed High Density Residential Zone (HRZ) in a continuous strip parallel to Papanui Road through Strowan (stretching from Papanui Road to Watford Street) to a Medium Density Residential Zone (MRZ).

Provision: Chapter 14 Residential

Seek Amendment

I seek the following decision from the Council

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

The council amend the Housing and Business Choice Plan Change 14 (PC14) from the proposed High Density Residential Zone (HRZ) in a continuous strip parallel to Papanui Road through Strowan (stretching from Papanui Road to Watford Street) to a Medium Density Residential Zone (MRZ).

The area between Watford Street and Papanui Road - in particular the residential area of Watford Street, Christchurch.

My submission is that:

The council amend the Housing and Business Choice Plan Change 14 (PC14) from the proposed High Density Residential Zone (HRZ) in a continuous strip parallel to Papanui Road through Strowan (stretching from Papanui Road to Watford Street) to a Medium Density Residential Zone (MRZ).

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:

The council amend the Housing and Business Choice Plan Change 14 (PC14) from the proposed High Density Residential Zone (HRZ) in a continuous strip parallel to Papanui Road through Strowan (stretching from Papanui Road to Watford Street) to a Medium Density Residential Zone (MRZ).

The area between Watford Street and Papanui Road - in particular the residential area of Watford Street, Christchurch.

My submission is that:

The council amend the Housing and Business Choice Plan Change 14 (PC14) from the proposed High Density Residential Zone (HRZ) in a continuous strip parallel to Papanui Road through Strowan (stretching from Papanui Road to Watford Street) to a Medium Density Residential Zone (MRZ).

Attached Documents Name Transport Amenity and Character Conclusion

TRANSPORT

The proposed change for High Density Residential Zone (HRZ) in a continuous strip parallel to Papanui Road through Strowan (stretching from Papanui Road to Watford Street), without any requirement for new developments to provide any on-site parking, will place significant additional pressure on basic transport infrastructure such as on-street carparking and traffic congestion all of which are not coping currently.

1. INFRASTRUCTURE

Relevant PC14 clause references and extracts are given in italics:

Section 14.2.8.5 Policy – Infrastructure servicing for developments

a. Ensure that developments are serviced with all required infrastructure in an effective and efficient manner

Section 14.2.8.6 Policy – Integration and connectivity

c. Avoid significant adverse effects and remedy or mitigate other adverse effects on existing businesses, rural activities or infrastructure.

Adequate 'infrastructure' includes adequate carparking and a safe and effective transport network which does not contribute to traffic congestion.

My specific concerns in relation to the impact of the proposed changes on this infrastructure in particular in my community of Strowan are as follows:

- the supply of on-street carparking spaces currently cannot keep-up with the demand for carparking, resulting in time-based (two hour maximum) parking restrictions on most surrounding streets. A major contributor to the on-street carparking issue is St Andrews' College, which defines the southeast limit of Strowan in this area. The school has a total population of around 2000 and is growing with a large waiting list for entry. The proposed change to HRZ in the Strowan community will magnify this existing, significant on-street carparking problem;
- the existing traffic management issues associated with St Andrews' College also pose a significant health and safety issue from morning and afternoon congestion in Normans Road and surrounding streets at school drop-off and pick-up times, causing delays and congestion at intersections linking with surrounding primary roads including Papanui Road and Strowan Road. All of these issues will be exacerbated by the proposed intensification of residential development in the community but especially by the proposed HRZ over many blocks.

2. LACK OF CARPARKING PROVISION FOR VULNERABLE MEMBERS OF OUR COMMUNITY

Relevant PC14 clause references and extracts are:

Section 7.2.1.2 Policy – High trip generating activities ix provide for the transport needs of people whose mobility is restricted

Section 7.2.1.5 Policy – Design of Carparking areas and loading areas iii be accessible for people whose mobility is restricted

At a general level, the removal of the requirements for new residential housing developments to provide for any on-site parking, will have a significant and disproportionate impact on a number of vulnerable groups in our community. These groups include

- people with disabilities;
- elderly residents; and
- families with children.

This impact will be significant on both

- existing residents and
- residents living in new developments

as increasingly they and their visitors will not be able to expect and/or rely on their ability to park close to their place of residence. This will be exacerbated significantly in the Strowan area where the current on-street carparking supply does not meet demand and this is a further reason why the proposed HRZ must not be implemented.

AMENITY/CHARACTER

Relevant PC14 clause references and extracts are given in itallics:

Section 14.2.4.2 Policy – High quality, medium density residential development a Encourage innovative approaches to comprehensively designed, high quality, medium density residential development, which is attractive to residents, responsive to housing demands and reflects the planned urban built character of an area.

The proposed HRZ which is shown to be almost continuous down Papanui Road and for at least one block either side of Papanui Road is not consistent with the stated intent of this Section/Policy above and it certainly does not support '...medium density residential development, which is attractive to residents, responsive to housing demands and reflects the planned urban built character of an area'.

My specific concerns in relation to the impact of the proposed changes on the amenity/character in particular in my community of Strowan are as follows:

- the Strowan neighbourhood has an amenity character and fabric and a sense of community which is very attractive to residents, which is highly valued and worthy of retention. This is comprised of a number of elements including:
- there is still a significant proportion of older, quality homes;
- the homes are typically on larger than average sections so a sense of open space is still present;
- there are a number of prominent trees and landscaping on properties which reinforces both the perception and reality of quality open space 'around' buildings (and which clearly supports the Council's Urban Forest Plan 2023 initiative);
- new homes which have been built are typically two storey, with the scale, density and quality largely in keeping with the existing character and built form elsewhere in the Strowan community.

I urge Council to identify the area of Strowan, particularly those blocks in the vicinity of St Andrews College, as worthy of definition as an area which warrants zoning as MRZ not HRZ as proposed in PC14, as the impact on infrastructure demand and amenity values under HRZ is significantly greater than under MRZ.

- the sense of community which is present would be undermined by the scale of intensification which is proposed under HRZ;
- there are a number of prominent trees remaining in the neighbourhood which reinforces the quality of open space amenity and character of our community, and which clearly supports the Council's Urban Forest Plan 2023 initiative; but which would inevitably be threatened with the high level of intensification under HRZ as

proposed in Plan Change 14.

CHANGE FROM HRZ TO MRZ IN STROWAN – SO AS TO BE CONSISTENT WITH STATED INTENTION

Relevant PC14 clause references and extracts are:

Section 14.2.7 Objective – High Density Residential Zone

a. High density residential development near larger commercial centres, commensurate with the expected demand for housing in these areas and the nature and scale of commercial activities, community facilities, and multimodal transport networks planned or provided in the commercial centres.

Section 14.2.7.2 Policy – High density location

- a. Enable high density residential development within walking catchments of the:
- i. City centre zone;
- ii. Town Centre zones of Riccarton, Papanui, and Hornby; and
- iii. Other larger commercial centres zoned as Town Centres and Local Centres; to a degree that responds to the planned scale and nature of each centre group and the range of activities planned or provided there.

Clearly the part of Strowan proposed as HRZ does not meet these criteria as it is not located near or adjacent to a commercial centre.

I am keen to support others in my community who I know are highlighting similar concerns in their submissions.

Conclusion

I urge Council to identify the area of Strowan, particularly those blocks in the vicinity of St Andrews College, as worthy of definition as an area which warrants zoning as MRZ not HRZ as proposed in PC14, as the impact on infrastructure demand and amenity values under HRZ is significantly greater than under MRZ.

- the sense of community which is present would be undermined by the scale of intensification which is proposed under HRZ;
- there are a number of prominent trees remaining in the neighbourhood which reinforces the quality of open space amenity and character of our community, and which clearly supports the Council's Urban Forest Plan 2023 initiative; but which would inevitably be threatened with the high level of intensification under HRZ as proposed in Plan Change 14.

I am keen to support others in my community who I know are highlighting similar concerns in their submissions.

Christchurch City Council

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 01/05/2023

First name: Nikki Last name: Smetham

Prefered method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Seek Amendment

I seek the following decision from the Council

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

Notwithstanding this, we have the following queries, concerns, and suggestions and seek amendments to the District Plan to resolve these matters:

- · Reduced internal privacy, ie avoid window to window views,
- · Compatible scale with surrounding residential suburb
- Provision for common electric car charging stations on development sites
- The monitoring process
- · Increased stormwater generally
- Suitability of residential hill zones increased stormwater runoff, erosion of views with adverse effects on amenity and investment
- The potential oversupply of one typology that may adversely impact on good urban design, diversity and character
- We note a key aim of the CCC Tree Policy is to plant "the right tree in the right place", however we have reservations about basing this on mature canopy size as per CCC's tree classification guide on their website. For example, under this tree classification, lancewoods are considered a large tree, and kowhais a very large tree! This maybe the case if these trees are growing in optimum conditions for hundreds of years, but these trees will be planted in an urban environment restricting their growth. It is noted that buildings are typically designed for a minimum of 50 years.
- We note that the tree planting guide supports the use of structural soil for enabling root growth under paved areas, but obviously trees planted in structural soil are unlikely to develop a mature canopy akin to that tree species.
- Perhaps CCC should seek a reduced tree canopy coverage, based on 10 years growth (a common measure for tree size), which is more likely to be achieved and maintained at this scale.
- We are concerned tree canopy and outdoor living space will overlap, and consequently, impact solar aspect for outdoor living spaces.
- We have reservations about how tree canopy cover will be measured. Often trees are planting along site boundaries, and so where the mature canopy projects beyond the boundary is this included/ excluded in the minimum canopy requirements?
- At what stage of CCC approval process would the tree canopy size, and necessary soil volume requirements to support
 the projected canopy size be assessed/ approved by CCC? Will the tree species need to be confirmed at resource
 consent stage?
- What happens if the tree species approved (or similar backup tree species) are not available during implementation, particularly as there is a preference to plant within the "planting season" between 1 April and 30 September.
- Will CCC periodically check that the trees planted to achieve minimum canopy coverage have been retained and are
 growing well. Again, if the tree size was based on 10 years instead of maturity, it would be easier to monitor and
 achieve the desired outcome.
- The most common berm width for planting street trees is approx. 1.5m wide. The list of trees suitable for planting in 1.5m wide berms is very limited, and many of these a shrub-like and unlikely to make good street trees. It's highly likely the very few species that do make good tree species will be specified on mass, and then eventually these will be considered over-represented by CCC arborists. Perhaps a wider minimum berm size is required in road reserves.

Are there any guarantees that the financial contributions collected by CCC will indeed be used for offsite replacement tree planting, and not for general revenue gathering (i.e. reallocated for maintenance or roading infrastructure).

We have further concerns regarding monitoring of trees required as part of a development where they are relied on for mitigation of higher density development allowed by the Medium Density Zone rules.

My submission is that:

In general we are in full support for the proposed Qualifying Standards to Chapter 14 Residential including specifically:

- Sunlight recession planes
- Transport qualifying standards
- Compliance with CPTED issues
- A minimum storage allowance that provides for secure storage for bikes, lawnmowers and other recreational equipment
- A minimum 20% tree canopy at maturity for residential subdivision and/ or development in residential zones
- A 15% tree canopy at maturity for roads reserves vested with CCC
- Payment of financial contributions to CCC where the above (either in full or part) are not met.

Our proposed Housing and Business Choice Plan Change (14)



Submitter Details

Submission Date: 01/05/2023

First name: Sally Last name: Wihone

Prefered method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Seek Amendment

I seek the following decision from the Council

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

Oriana Crescent, Hornby Suburbs, main south road

My submission is that:

Hello

I'm in a wheelchair and is difficult enough trying to cross the road, manoeuvre my wheelchair along the footpath or trying to find a park (my vehicle is adapted) sometimes I have to park adjacent to the footpath as I have a ramp coming out of the passenger side so with houses having no garages and some houses are going to be six stories high were are people going to park you guess yes on the road or like Wellington Half on the Footpath so please consider when making these massive decisions think of the elderly and the disable. Hornby is a growing population and a big part of the population is people with disabilities as Hornby is flat.

Regards

Sally Wihone

Our proposed Housing and Business Choice Plan Change (14)



Submitter Details

Submission Date: 01/05/2023

First name: Connor Last name: McIver

Prefered method of contact Email

Consultation Document Submissions

Provision: Chapter 6 General Rules and Procedures

Oppose

I seek the following decision from the Council

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

My submission is that:

Low public transport accessibility is a weak qualifying matter. This issue can be remedied by communicating with ECan to add service as and when required. All other qualifying matters seem sensible but I submit that this one is not. Perhaps development contributions could be sought to cover any capital outlay required to increase service in these areas.

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:

Please look at the way Auckland Council has consulted on their equivalent plan changes. That was significantly easier to engage with than this.

My submission is that:

Provision: Chapter 14 Residential

Seek Amendment

I seek the following decision from the Council

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

My submission is that:

I believe that 1.2 km for the central city and less for other centres is a very short distance for a walkable catchment. I submit that it should be 1.8 for the central city and 1.2 for other centres.

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:

My submission is that:

I wonder if it would be prudent to require houses to be built to two storeys in the zone at risk of tsunami damage. This would give occupants somewhere to go if they cannot evacuate to higher ground in time. Perhaps unnecessary, but I think it is worth consideration.



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Submission Date: 01/05/2023

First name: Baden Last name: McArdle

Prefered method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Support

I seek the following decision from the Council

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

My submission is that:

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:

John Paterson Drive borders Knightstream & Longhurst subdivisions borders us already & motorway no longer makes it really fit for breeding horses.



Submitter Details

Submission Date: 01/05/2023

First name: Russell Last name: Fish

Prefered method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Oppose

I seek the following decision from the Council

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

Review the 'Industrial Interface' Qualifying Matter, with a view to remove the designation where it is not already an historically established principle.

My submission is that:

This submission concerns Chapter 14 Qualifying Matter 'Industrial Interface', on existing residential property.

I offer no opinion on property that may at some time in the future be rezoned to residential, nor do I speak to more general established principles such as zoning for airport flight paths, main arterials etc.

'Industrial Interface: This Qualifying Matter restricts building height to 7m (two storeys) to protect residential areas next to industrial sites.'

I believe it is incorrect for council to establish a class of residential property which is inferior by virtue of council zoning it to carry the burden of protecting others from industrial nuisance. This zone may be seen as council tacitly signalling to industry that it is no longer its responsibility to ensure that adverse effects are contained within an industrial site, because the burden appears to now be placed, to an as yet unknown extent, on adjacent residential property.

The effect of this designation is likely to lead to reduced compliance by industrial sites in containing and mitigating their adverse effects on adjacent residential areas.

The effect of this designation, and the resulting restrictions on development, is likely to lead to an inferior class of low density residential property, surrounded by industry and high rise development.

The effect of this designation is likely to also lead to a gradual decay of responsibility by industrial operators, and a shift in public opinion about where their responsibility lies.

Planners appear to have unintentionally sidelined the principle that all adverse effects should be contained and mitigated within the industrial site.

I believe that if council ensures industry operates correctly next to a residential area, zoning for this qualifying matter would be unnecessary.

I do not support the creation of the Industrial Interface "buffer zone" within the residential zone, and believe mitigation / buffering



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Submission Date: 01/05/2023

First name: lan Last name: Tinkler

Prefered method of contact Email

Consultation Document Submissions

Provision: Chapter 3 Strategic Directions

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 Christchurch be developed in a sustainable way. It does appear that the population of greater Christchurch will continue to increase for the foreseeable future. The area covered by the plan is large. While the population will continue, there will not be a time when the residential property will be converted to having the full entitlement multistorey units as permitted in the plan. If that were the case, the population of Christchurch would be far larger than expected. It is far better that land currently used for housing provides more places to live, rather than increasing Christchurch into productive food-producing areas within the city and neighbouring district councils.

There are some concerns with the general plan:

- There are areas that are excluded due to infrastructure (like Shirley, as a result of the sewerage system). There is nothing to indicate the cost of mitigation by replacing the inadequate system to allow greater use of that land.
- Flooding is common in parts of Christchurch (like Emmett St, Flockton Basin, etc.). With less land to absorb water that falls in heavy rains, there will be more flooding. There will need to be migration for the flooding, which will need funding.
- Canopy:
 - Application for new buildings often occurs after the developers have removed existing trees. There should be at least an understanding of how often this occurs.
 - The requirement for minimum canopy cover is good. How is it ensured that the canopy is maintained after the development of the dwelling?
 - Where the canopy is not developed by the developer and the council undertakes the canopy within land owned by the CCC, how can Christchurch residents be assured that the canopy is being grown to offset the lack of canopy by developers?
 - I think that opting out of the developers creating the canopy is rare, and there are systems to ensure that the owners maintain the canopy.

Christchurch City Council

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details				
Submission Date:	01/05/2023 lan	Last name:	Thompson	
Organisation:	Spreydon Lodge Limited			
Prefered method of contact Email				
Attached Documents				
		Name		
Spreydon Lodge Ltd				* v



1.0 Introduction

1.1 Submitter details

This is a submission by Spreydon Lodge Limited (the submitter) on the proposed Housing and Business Choice Plan Change (PC14) to the Christchurch District Plan. The submitter owns the following property:

• 20 Monsaraz Boulevard, Halswell, Christchurch

1.1.1 Submission contact

The contact for this submission is:

Ian Thompson
Danne Mora Holdings Ltd
P O Box 36-307
Merivale, Christchurch 8145
T: 027 497 8804

E: ian@dmr.co.nz

1.2 Trade competition declaration

The submitter does not consider they could gain an advantage in trade competition through this submission. In any event, the submitters are directly affected by an effect of the subject matter of the submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

1.3 Hearing options

The submitter wishes to be heard in support of this submission.

The submitter would consider presenting a joint case at the hearing.

2.0 Submission details

2.1 Provisions to which the submission relates

The submission relates to the proposed Town Centre Zoning and associated Outline Development Plan (**ODP**) of 20 Monsaraz Boulevard, Halswell, Christchurch.

2.2 Position on the provisions

The submitter opposes the inclusion of the transport interchange, main street, civic square/village green and green corridor as illustrated within the ODP for North Halswell (contained at Appendix 15.15.3) and seeks to have them removed (**Figure 1**).

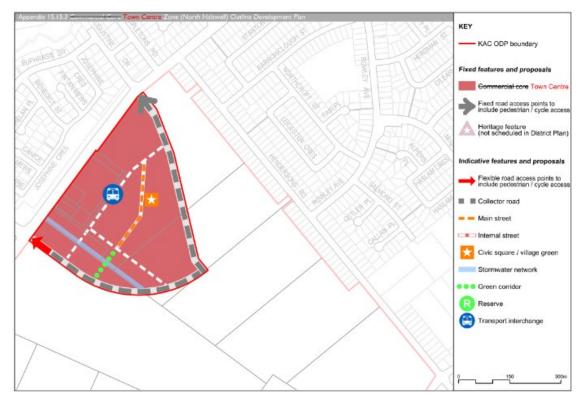


Figure 1: ODP for North Halswell at Appendix 15.15.3

The submitter also opposes the references to the main street within the objectives, policies and rules relating to the Town Centre Zone at North Halswell and seeks consequential changes to the provisions to give effect to the relief sought.

2.3 Reasons for submission

RMA/2017/3185

- Landuse and subdivision resource consent has been granted for a residential and commercial mixeduse development of land at 201 Halswell Road, North Halswell, Christchurch (referenced RMA/2017/3185).
- The key commercial elements of the proposal as illustrated on stamped approved plans include:
 - o The creation of two development lots for mixed use and commercial development in the northwest corner of the site;
 - The enhancement and naturalisation of days drain extending along most of the northern boundary for a length of approximately 680m;

¹ Set J – Architectural Drawings: Approved Plans 99 to 151 (ASC Architects drawings labelled Amended Resource Consent Application, dated September 2020, project no: 17803, Sheets RC01 to RC51)

- o Commercial and community activities with a gross floor area (GFA) of 8,087m² comprising:
 - (i) a retail floor space of 5,155m² inclusive of a supermarket of 3,490m² on Lot 1 with the remaining 1,665 m² as retail food and beverage;
 - (ii) community activities of 1,570m² GFA comprising a medical centre and childcare centre;
 - (iii) a swimming pool, cinema and gymnasium;
 - (iv) a cinema of 641.7m² GFA on Lot 12.
- The granting of this resource consent pulls the commercial focus away from the Main Street and Civic Square for the following reasons:
 - o The orientation and positioning of the consented development;
 - o Encroachment of the commercial development into the proposed High Density Residential Zone to the south;
 - O The alignment and design of the Green Corridor differs to that shown on the ODP and as a consequence reduces the connection to the ODP's Main Street;
 - o The extent and design of the car parking and lack of building activation and amenity along the frontage with the main road (Road A); and
 - o The location and orientation of the supermarket, and fine-grained retail on the Halswell Road frontage creating a lack of integration and connection between the consented supermarket, the Green Corridor and the Main Street.

National Policy Statement on Urban Development (NPS-UD) (2020)

The NPS-UD has introduced a new policy direction which has changed the approach to how Christchurch City Council must provide for development within its urban area and seeks to remove overly restrictive barriers to development. In particular the NPS-UD requires district plans to:

- Achieve well-functioning urban environments that enable a variety of sites that are suitable for different business sectors in terms of location and site size and supports, and limit as much as possible adverse impacts on, the competitive operation of land and development markets (Objective 1 and Policy 1);
- Enable more people to live in, and more businesses and community services to be located near a centre zone or employment opportunities, in areas well-serviced by existing or planned public transport and/or areas where there is high demand for housing or for business land (Objective 3);
- Enable building heights and densities in the city centre to realise as much development capacity as possible to maximise benefits of intensification (Policy 3(a));
- Provide for buildings heights of at least six storeys within walkable catchments of city centre and metropolitan centre zones and existing and planned rapid transit stops (Policy 3(c));
- Provide for building heights commensurate with the level of commercial activity and community services within and adjacent to neighbourhood centre zones, local centre zones, and town centre zones (Policy 3(d)); and
- Recognise the planned urban built form may involve significant changes to an area, and those changes and that may detract from amenity values appreciated by some people but improve amenity values appreciated by other people, communities, and future generations, including by providing increased and varied housing densities and types (Policy 6).

Qualifying Matters

The proposed objectives and policies of Chapter 15 Commercial includes a number of references to 'qualifying matters'. Reference to 'qualifying matters' within the objectives and policies framework does not provide clear direction on the development outcomes to be achieved. In particular:

- 'Qualifying matters' is a broad term used in the NPS-UD and directs additional section 32 analysis requirements.
- The reference to 'qualifying matters' in the objectives and policies lack specificity as it does not describe or identify those values or features that warrant lower heights and densities. A number of qualifying matters as identified by Council would not limit heights and densities, and can be appropriately accommodated by specific site design.
- In some instances, the identification and application of qualifying matters under the IPI is a plan method, which may be unnecessary to reference within the Commercial Chapter's objectives and policies framework.

In summary, the policy directive of the NPS-UD requires Council to have plan-enabled business land where business use is a permitted, controlled, or restricted discretionary activity on that land. In addition to this, the Housing and Business Development Capacity Assessment (HBA) for business land needs to assess the volume of land available which is plan-enabled, infrastructure-ready, and suitable for each business sector. Clause 3.29(2) outlines that a Council may define what it means for development capacity to be "suitable" in any way it chooses, but suitability must, at a minimum, include suitability in terms of location and site size.

District plans can modify the relevant development capacity, building height or density requirements under Policy 3 of the NPS-UD only to the extent necessary to accommodate a qualifying matter in that area. Under the NPS-UD Council cannot retain rules in a plan unless it is either a qualifying matter or if "other matter" a robust site-specific cost/benefit analysis has to have been undertaken.

In terms of the Submitter's land, it would be removing the unnecessary barriers to developing the business zoned land, which includes the public transport interchange, main street, civic square/village green and green corridor as noted within the ODP. The Submitter's land is not subject to any qualifying matter and therefore there is no reason for restricting the development capacity of the land.

3.0 Decision the submitters' want Council to make

The submitters request the following amendments to PC14. Delete all provisions requiring the main street, civic square/village green and green corridor at North Halswell, including as discussed below.

- Delete reference to main street at Clause 8.10.4.C (a)(i) 'Development Form and Design' as follows:
 - 8.10.4.C Development Form and Design
 - a. The following design elements and features are relevant considerations in exercising control over the matters in Rules 8.7.1 8.7.4 or the matters for discretion in 8.8. They are not requirements for the purposes of Rule 8.6.11(a) or Rule 14.12.2.16.
 - i. This development area new neighbourhood is to be established around the Key Activity Centre (zoned Commercial Core Town centre) proposed as a mixed use village centred focused around a main street. This will form a focus for the community.
- Delete the main street, civic square/village green and green corridor from the ODP for North Halswell (contained at Appendix 15.15.3 Town Centre Zone (North Halswell) ODP).

• Amend Policy 15.2.2.2 'Comprehensive approach to development of the North Halswell and Belfast/ Northwood Key Activity Centres' to remove reference to main street at part 15.2.2.2(b)(ii) as follows:

b. Require development within the North Halswell Key Activity Centre to:

ii. provide high quality public open spaces, a strong main street with a concentration of finer grain retailing, and strong linkages between key anchor stores;

• Delete Matters of Discretion Rule 15.1314.4.3.2(a)(i) 'Commercial layout' as it references the requirement to have a critical mass of activity centred upon the Main Street as follows:

15.1314.4.3.2 Commercial layout

a. The extent to which development:

i. ensures a critical mass of activity is centred upon the open air Main Street including an appropriate balance of large format retail activity and concentration of finer grain commercial activities;

 \underline{i} \vdots . supports a retail mix (large format and finer grain retailing) which ensures the centre meets its role as a $\underline{District}$ Town Centre and Key Activity Centre and meets the needs of the catchment population; and

 $\underline{\it ii}$ $\overline{\it iii}$. functions operationally and visually as an integrated commercial entity.

• Delete Matters of Discretion Rule 15.1314.4.3.4(a)(i-iii) 'Transport' as it references the main street, public transport interchange and carparking area as follows:

15.1314.4.3.4 Transport

a) The extent to which development:

i. provides for an easily accessible, readily visible public transport interchange located centrally within the commercial core of the Key Activity Centre;

ii. provides car parking areas as shared spaces, available for shared use, which does not visually or physically dominate the area;

<u>i</u> iii. provides for pedestrian priority within the retail core, particularly in respect to the open air main street environment;

• Delete Matters of Discretion Rule 15.1314.4.3.5 'Civic Square' as it refers to the civic square as illustrated within the ODP for North Halswell.

15.1314.4.3.5 Civic Square

a. The extent to which development:

i. connects the civic square and the Main Street, both visually and physically;

ii. provides for a civic square of a sufficient size to allow for a range of community activities, events and interaction; and

iii. provides a high quality civic square laid out and designed in a manner that achieves a high quality and safe, open space environment.

• Such further or other relief, or other consequential or other amendments, as are considered appropriate and necessary to address the concerns set out in this submission.

Christchurch City Council

Our proposed Housing and Business Choice Plan Change (14)

Submission on Proposed Plan Change 14 to the Christchurch District Plan

Submission Date: 01/05/2023
First name: Tracey Last name: Strack

Prefered method of contact Email

Attached Documents

Name

Submission on Proposed Plan Change 14 to the Christchurch District Plan

Submitters: Matthew and Tracey Strack

9 Helmores Lane Christchurch 8014

We have lived on the Avon river area since we first were married in the 1980's and enjoyed the special character of Little Hagley park, the Helmores Lane, Desmond Street and Rhodes Street area. After living away from Christchurch for over twenty years we purchased a section with a condemned property and set about developing a modern family home. It has been a joy returning to such a beautiful part of the city and we walk around the area most days.

We recognise the special character of this area and the effort people have gone to with new buildings, such as ours. In many parts of this area the land is rated TC3 and not suitable for taller buildings. There is also the issue of potential flood risk, both now and in the future. Large multi-unit structures can significantly reduce rainwater absorption into the ground and exacerbate flooding risk to the whole area.

This area has been recognised as having a special character in the past. The combination of building quality and generous tree planting are immediately obvious to visitors. All day long we have people arriving who park outside our homes who use the area as an entry point to the Hagley park area. This would not be possible with large multi unit dwellings each generating multiple cars that would be left parked on the road rather than garaged.

We consider that there is the ability to protect what is special about this area by:

- Rezoning the area Medium Density, and identifying the Area as a Residential Character
 Overlay Area, with the applicable rules (as attached): or
- Rezoning the area Medium Density and imposing a further change to the qualifying matter allowing access to sunlight by making the recession plane 45°, rather that 50°, from 3m at southern boundaries: and/or
- Providing that southern boundary neighbours can be notified if resource consents for height or access to sunlight non-compliances.

There may be other ways to reduce the impacts on character of the intensifications changes which will become apparent and which we would like considered, but the key is that we think there is a need to protect the existing character. Having it identified as a Residential Character Area appears the best way, but if that is not possible, reducing the extent of any permitted

119

intensification should be explored. At the very least, this area should not be zoned high

density.

We seek the following decision from the Council:

• That Helmores Lane, Desmond Street and Rhodes Street (to Rossall Street) be

identified in the Christchurch District Pan as a Medium Density Residential zone and a

Residential Character Overlay Area and be made subject to the rules that apply to

Residential Character areas: or,

• If Helmores Lane, Desmond Street and Rhodes Street (to Rossall Street) are not

included as a Residential Character Area, that the Area be zoned Medium Density

Residential: and,

That sunlight access be better protected by further amending the medium/high

density southern boundary recession plane to 45° from 3m at the boundary: and,

• That neighbours along the southern boundaries of any proposed developments that

involve non-compliances with height or access to sunlight rules can be notified of the

required resource consents and to make submissions.

• Any further or other decisions that achieve the outcomes sought by this submission,

or are required as a consequence of the relief we seek.

Signed: Matthew Strack

Dated: 1 May 2023

Tracey Strack



\circ	Land Section 1	Dorto He
Su	omitter	Details

Submission Date: 02/05/2023

First name: Sandra Last name: Caldwell

Prefered method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Oppose

I seek the following decision from the Council

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

My submission is that:

Main Shopping Centre Accessibility

andnbsp;

Paparoa Street is certainly not reasonably walking distance from Northlands Mall. It is not practical to expect people to walk 1.8 kilometres carrying a weekly supermarket shop. There are already supermarket trolleys on streets closer to Northlands Mall than Paparoa Street. The distance is also considerably greater than the council's own requirement of 1.2 kilometres walkability for the city centre and smaller catchments for other centres (page 12 of Council document "have your say on the District Plan Changes")

andnbsp;

andnbsp;

Infrastructure

andnbsp;

Paparoa Street was established for urban residential living and as such has an infrastructure to match. Any change to zoning would have a severe impact on services such as, water reticulation, sewage and electricity supply – all designed for residential dwellings, not high-density apartment living.andnbsp;andnbsp; Rezoning Paparoa Street to high density living will also place an unknown strain and financial burden on existing infrastructure.

Paparoa School is already at capacity-any increase in housing density in this area would see Paparoa School boundaries shrink which would have enormous impact on all surrounding schools.

andnbsp;

andnbsp;
School Safety
andnbsp;
Paparoa Street is home to the highly sort after Paparoa Street School and as a consequence saturates the parking during school days. High density apartments that have no off-street parking requirement (so they could park all day on the street) will add significant traffic congestion during the school terms and seriously impact on the safety of both children and parents.
andnbsp;
andnbsp;
Parking
andnbsp;
Paparoa Street being a cul-de-sac is pressured at both ends for parking requirements. Paparoa Street is already difficult for traffic entering and exiting Papanui Road. Parking on both sides of the street makes traffic movement limited to one car travelling in either direction at one time due to the current width of the road. Changes in traffic habits since the earthquakes has already seen an unexpected burden placed on this area not originally designed for the current flow of traffic. Paparoa Street is extremely busy as parents drop off and pick up students adding high density apartments with. No off-street parking requirement will undoubtedly cause significant traffic and safety risks during school terms.
andnbsp;
andnbsp;
Social Impact
andnbsp;
High density apartment living with no access to outside space (e.g., lawns) does not replicate the family friendly urban environment for which the area was originally designed. With the desirability of the numerous schools in the area high density housing is not conducive to the type of family clientele seeking to make the area home. We have no need to replicate Hong Kong, Singapore and New York in this regard.
andnbsp;
andnbsp;
Papanui Heritage Designation (Plan Change 13)
andnbsp;
A number of streets around Paparoa Street are "Memorial Avenues" which have been designated as heritage

A number of streets around Paparoa Street are "Memorial Avenues" which have been designated as heritage streets by the 2015 Independent Hearings Panel. The Council has acknowledged this in Plan Change 13 (16 Papanui War Memorial Avenues). Paparoa Street and surrounding streets are visibility attractive in keeping and represented of Memorial Avenues. As a leafy suburb which together with the pleasant blend of restored villas and new houses which have been built in a manner which blends new with old to create an interesting fabric of housing. Removing existing trees and gardens to accommodate high rise apartment blocks will have a serious negative impact on this image.

120
andnbsp;
andnbsp;
The Need for High Density Housing in Christchurch
andnbsp;
The rezoning of Paparoa Street and parts of Papanui is unnecessary as there are large tracts of land in Christchurch already zoned for high density living. Large areas already zoned are sitting undeveloped and are likely to take many years to develop and populate. High density housing should in the immediate future be solely to the areas in the cities four avenues to attract a vibrant population base back into the city to support the central cities vision.
andnbsp;
andnbsp;
Land Suitability
andnbsp;
The land <i>quality</i> in Paparoa Street is likely not suitable for high density building.andnbsp; If new two-story houses need 4 metre driven piles what would a 6-story apartment block require?andnbsp;
andnbsp;
andnbsp;
Papanui Designation "Large Town Centre"
andnbsp;
Papanui can hardly be considered a "Large Town Centre" and should now be designated as a "Suburb Centre".andnbsp; The face of this area has changed dramatically as a number of highly sort after services have left the area.andnbsp;
andnbsp;
andnbsp;
Apartment Blocks Placement
andnbsp;
Apartment blocks should be in clusters where essential services can be designed and provided accordingly e.g., green space, cafes and restaurants, supermarkets and transport options.
Walking options to employment within the commercial fabric of inner city would relieve pressure on transportation needs and the provision there of.
andnbsp;
andnbsp;
Other Options to Consider

andnbsp;

There are other areas around Papanui that do not have heritage designated tree-lined streets, heritage housing
and closer to main service requirements e.g., Northland Mall and Northlink shopping precinct. As all of the above
contribute to high property values in the Paparoa Street area any high-density housing would have an immediate
negative impact on this.



Submitter Details

Submission Date: 01/05/2023

First name: Cameron Last name: Matthews

Prefered method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Seek Amendment

I seek the following decision from the Council

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

Refer to attached submission

Briefly;

Remove (or substantially revise, as per attached submission) specific Qualifying Matters:

- Sunlight Access
- Residential Character Area
- Airport Noise Contour
- Riccarton Bush Interface
- Low Public Transport Accessibility Area

Remove the low-density zones/precincts and re-zone affected sites such that they are consistent with MDRS and NPS-UD:

- Residential Suburban zone
- Residential Hills Zone
- Residential Hills Precinct
- · Residential Mixed Density Precinct Redmund Spur

Promote specific centres to at least Local Centre (Medium) and rezone adjacent/nearby blocks with at least MRZ + Local Centre Intensification Precinct, or HRZ, or equivalent:

- Addington
- Lyttelton
- Sumner
- Sydenham South
- Wigram

Amend HRZ built form standards to permit feasible high-density forms for older 15m-wide sites, and front-of-site development, by, for example:

- Change side/rear height-in-relation-to-boundary (HIRTB) rules such that they are consistent with MDRS for MRZ
- Waive HIRTB from side and rear boundaries for parts of the building at the front of the site which are setback by more than 5m, or preferably 3m
- Remove Building Separation requirement

- Increase maximum permitted height to 18-21m, at least for front of site
- Increase number of permitted unit to at least 6 within HRZ

Amend MRZ built form standards:

- Amend side/rear boundary HIRTB rules such that they are consistent with MDRS
- Waive HIRTB for parts of building at front of site for parts of building setback by more than 5m, or preferably 3m.
- Increase number of permitted units to 4, potentially only within Intensification Precinct such as LCIP.

Further up-zone areas, with for example HRZ or MUZ within:

- Walkable catchment of all Core Bus Routes
- Some buffer zone of all Major Cycle Routes
- Walkable catchment of Addington railway station, and other rail-adjacent suburbs such as Hornby, Addington, Riccarton, Papanui, Sydenham/Moorhouse, Heathcote Valley, and Lyttelton.

My submission is that:

Refer to attached submission

Provision: Chapter 15 Commercial

Seek Amendment

I seek the following decision from the Council

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

Refer to attached submission

Briefly;

Remove (or substantially revise, as per attached submission) specific Qualifying Matters:

- Sunlight Access
- Residential Character Area
- Airport Noise Contour
- Riccarton Bush Interface
- Low Public Transport Accessibility Area

Promote specific centres to at least Local Centre (Medium) and rezone adjacent/nearby blocks with at least MRZ + Local Centre Intensification Precinct, or HRZ, or equivalent:

- Addington
- Lyttelton
- Sumner
- Sydenham South
- Wigram

Further up-zone areas, with for example HRZ or MUZ within:

- Walkable catchment of all Core Bus Routes
- Some buffer zone of all Major Cycle Routes
- Walkable catchment of Addington railway station, and other rail-adjacent suburbs such as Hornby, Addington, Riccarton, Papanui, Sydenham/Moorhouse, Heathcote Valley, and Lyttelton.

My submission is that:

Refer to attached submission

Provision: Chapter 3 Strategic Directions

Seek Amendment

I seek the following decision from the Council

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

Refer to attached submission.

Amend Objective 3.3.7 to de-prioritise aesthetic considerations when evaluating a well-functioning urban environment, in favour of the more relevant and wide-ranging NPS-UD Policy 1 definition.

My submission is that:

Refer to attached 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:

Refer to attached submission, in particular:

- Remove (or substantially revise, as per attached submission) specific Qualifying Matters:
- Sunlight Access
- Residential Character Area
- Airport Noise Contour
- Riccarton Bush Interface
- Low Public Transport Accessibility Area

Remove the low-density zones/precincts and re-zone affected sites such that they are consistent with MDRS and NPS-UD:

- Residential Suburban zone
- Residential Hills Zone
- Residential Hills Precinct
- · Residential Mixed Density Precinct Redmund Spur

Promote specific centres to at least Local Centre (Medium) and rezone adjacent/nearby blocks with at least MRZ + Local Centre Intensification Precinct, or HRZ, or equivalent:

- Addington
- Lyttelton
- Sumner
- Sydenham South
- Wigram

Further up-zone areas, to for example HRZ or MUZ within:

- Walkable catchment of all Core Bus Routes
- Some buffer zone of all Major Cycle Routes
- Walkable catchment of Addington railway station, and other rail-adjacent suburbs such as Hornby, Addington, Riccarton, Papanui, Sydenham/Moorhouse, Heathcote Valley, and Lyttelton.

My submission is that:

Refer to attached submission

Provision: Chapter 13 Central City

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:

Refer to attached submission.

Briefly, I support increasing the height limits at minimum to what is proposed.

Attached Documents

	Name	
Submission on Plan Change 14 CM		

Submission on Plan Change 14

Cameron Matthews

Executive Summary

It is important to comply with the law, reduce land-supply constraints to housing and business, and strategically plan our cities to be sustainable and resilient – both environmentally and economically – as well as vibrant and attractive. In the version of Christchurch City Council's Housing and Business Choice Plan Change 14 (PC14) notified 17 March 2023, several issues exist which prevent Christchurch achieving one or more of these objectives. These issues include:

- Inclusion of density restrictions which do not meet the standard of Qualifying Matters (QM) as defined in the National Policy Statement Urban Development 2020 (NPS-UD). In particular; the proposed QM's: Sunlight Access, Special/Residential Character Area, Airport Noise Contour, Riccarton Bush Interface, as well as the proposed Residential Suburban and Residential Hills zones. These should be removed or revised such that they no longer restrict the allowable density on affected sites beyond that permitted by legislation.
- Errors in the application of other QMs, particularly the Low Public Transport Accessibility Area QM. This QM should be removed from the plan or narrowed to apply to far fewer sites. This proposed QM also does not meet requirements, as the spatial extent is not correctly identified.
- Poor identification of the spatial extent of some zones, such that planned residential density is not commensurate with the scale of commercial activities as required by NPS-UD. Several areas should be promoted to at least a "Medium Local Centre" with the associated surrounding Intensification Precinct, or otherwise be permitted equivalent densities. Higher densities should also be more feasibly enabled in HRZ zones by increasing the permitted height limit, while reducing the setbacks, recession planes, and building separation requirements.
- Lack of sufficient intensification focus on strategic key public and active transit routes, such as our all-day high-frequency Core Bus Routes, or our Major Cycle Routes (MCR), the Addington rail station and other rail-adjacent suburbs. These areas should be further up zoned.
- Identification of inappropriate strategic objectives prioritising vague aesthetic preferences over the affordable and quality housing of the city's residents. Such objectives should be revised.

Other aspects of the proposed plan seem positive, such as:

- Extensive Mixed-Use Zoning in Sydenham/Addington and Central City, for a characterful, fine-grained urban form, though building setbacks should be reduced to match residential zones
- Increased height limits in the central city, town, local, and neighbourhood centres, though they should be higher still
- Increased density limits in CCZ, CCMUZ, MRZ, HRZ, and MUZ zones, though HRZ should be higher still.
- Perimeter-block-enabling rules waiving height-in-relation-to-boundary requirements at the front of sites in HRZ sites, and minimum height requirements in HRZ.
- The idea of natural hazard QM's to avoid over-investing in high-risk locations, though if any residential uses are allowed in these areas, then higher density uses should be too.
- The idea to focus growth around areas with high local amenities / key activity centres and public transport routes, though not the proposed implementation which rather than sufficiently upzone these areas and their walkable catchments often limits the permitted density elsewhere to below baseline MDRS requirements instead.

Contents

Executive Summ	ary	1
About me		4
Matters which a	ren't Qualifying	6
Sunlight Acces	ss	6
Special Chara	cter Areas	10
Hackthorne	Road	10
Beckenham	1	11
Roker and F	Penrith	12
Airport Noise	Contour	12
Insufficient	range of options considered to achieve the greatest heights and densities	12
Riccarton Bus	h Interface	13
Overestima	ted impact of intensification	13
Inconsisten	t with NPS-UD	14
Ineffective	at managing claimed 'specific features'	15
High negati	ve impact on housing	16
Overzealou	s spatial extent	18
Low-density zon	es not meeting regulations	19
MDRS argu	ments	19
NPS-UD arg	guments	19
Errors in applica	tion of Qualifying Matters	21
Low Public Tra	ansport Accessibility Area	21
Affected co	mmunities served by Core Bus Routes	22
Affected co	mmunities served by Future Core Routes	23
Affected co	mmunities served by City Connector or other services	23
Inconsisten	t application unrelated to PT provision	24
Inconsisten	t application unrelated to accessibility	27
High negati	ve impact on housing	29
Planned density	insufficient	30
Compromised	l enablement of high density in HRZ	30
Addington		33
Lyttelton		37
Sumner		37
Sydenham So	uth	39
Wigram		39

PC14 Submission Executive Summary

Inappropriate and subjective strategy objectives4	-0
Lack of focus on Public and Active Transport4	2
Lack of focus off rubile and Active Transport	
More housing near Core public transport routes4	-2
More housing near Major Cycle Routes4	2
More nousing near Major Cycle Noutes	
Housing near (potential) rail stations4	4

PC14 Submission About me

About me

Having grown up in Hamilton, I moved to Christchurch in 2010 to attend the University of Canterbury, living variously in Ilam and Riccarton, close to the university. Back then, as now — I loved the opportunities for outdoor pursuits with extensive hiking, mountain biking, and skiing. The earthquakes obviously had a huge impact on the urban form of the city, essentially robbing it of much amenity value for many years, but contributed to a sense of civic responsibility, and connection with those who shared that experience. During my studies I was also fortunate enough to spend a semester at the University of British Colombia in Vancouver, Canada — a city with an incredible natural environment, high latitude, and occasional snowfall — in those ways not unlike Christchurch, but a place which also — unlike Christchurch - had dense housing, a large and vibrant economy, and outstanding public transport.

After university I relocated to Auckland for work and met my partner. After a few years of battling to save money against rampant escalation of housing costs, and incredible congestion on the roads with few viable, alternative options for travel – despite the good metro rail network at the time – we decided in 2019 to move back to Christchurch after a few months travelling. The average Christchurch house price then was approximately half that of the average house in Auckland, following the building boom of the earthquake rebuild. In addition, the city's extensive investment in urban cycleways and public spaces made the city both easy to get around without congestion, and worth spending time (and money) in. And we both still love the outdoor pursuits and natural environment at the doorstep of the city. Moving back was a no-brainer!

During the COVID lockdowns I resumed work with my Auckland-based employer remotely and continue to do so. After initially living in Somerfield, with great cycling infrastructure and connectivity to the city and Port Hills, we bought our first home in 2021 – in Addington – a suburb with great local cafes and restaurants, good public transport, excellent cycling and walking connections into the city, Hagley Park, and even to the hills, meaning we barely needed to own even one car between us. Addington's urban character is mixed – with residents with a diverse range of socio-economic backgrounds, an interesting and vibrant mix of older homes, new medium density, multi-storey office buildings, light industrial, commercial and retail/hospitality, pocket parks and street-trees. In short, it's a cool and interesting place to live. I'm keen to see how it grows!

This year though, we're living in Tauranga, as my partner's medical training requires experience in other centres. We're renting out our Addington home while we're away and thinking about our future plans. While we love many aspects of Christchurch such as the outdoor pursuits, the safe and congestion-free cycling, the public spaces, and general atmosphere of change and growth present in many parts of the city, some aspects risk letting it down as it continues to grow.

If we fail to make housing more affordable. If we fail to meaningfully improve the public transport. If we stop pushing for better, safer cycling infrastructure, and better public spaces. If we fail to improve the diversity and scale of opportunities in the local economy, allowing for growth of well-paying jobs. People like us – young(ish), skilled professionals – have the capability to live, work, and contribute nearly anywhere – and many cities exist around the world which are already excelling on these measures. Their existing amenity is an undeniable drawcard. But I like Christchurch and want it to succeed. I don't want to see it become unaffordable, with increasing inequity and class-division, housing poverty and homelessness. I don't want to see it baking-in the historically poor decision-making around spatial planning and transport, locking residents in car-dependency and choking the life from the city. In short, I don't want to see Christchurch lose what advantages it had when we decided to live there. Many cities and countries are bending over backwards to try and attract people to fill desperate skills

PC14 Submission About me

shortages for the likes of doctors, engineers, and accountants and tech professionals, not to mention nurses, bus drivers, teachers, tradespeople, and others essential to the community.

That means — as other cities act to improve their standards of living and housing affordability through good urban planning, and pressures on urban living such as population growth and climate change increase — that Christchurch also needs to act, to maintain its absolute and relative advantages. I see implementation of NPS-UD and MDRS as crucial steps to take to achieve this. In reading the proposed Plan Change 14 though, I have identified several aspects of the plan which appear to limit this required action, which, if implemented, will reduce Christchurch's future liveability even compared with other Tier 1 cities within New Zealand. In several cases these aspects do not appear to comply with the NPS-UD or MDRS legislation, or else fail to fully exploit the latent opportunities of the city.

While much of this submission will read as a largely negative critique of the proposed plan change, I'm in support of its main effects: enabling substantially more housing, especially within and well-connected to our city centre and core neighbourhoods, thus encouraging a compact urban footprint that's easier to get around, more prosperous, and more environmentally and economically sustainable. I argue that the proposed plan doesn't go far enough and that many proposed Qualifying Matters get in the way of fully realising this outcome. I hope these observations, suggestions, and advocacy is taken in good faith as aiming for improvements to the plan for the city, for the benefit of ours and future generations.

Matters which aren't Qualifying

Sunlight Access

The proposed Qualifying Matter is identified by council as having two broader effects. The first is delaying implementation of PC14 by a year¹, and the other is increasing the value of houses². These two effects are contrary to the goals of the legislation, and for this reason the Sunlight Access Qualifying Matter should be removed from the proposal.

The proposal has a **high impact**, which is **obfuscated by CCC's impact assessment only including the effect on RS zones transitioning to MRZ**. They assert³ that *within that group*, 96% of the floorspace that would be enabled by MDRS would be achieved with their proposed QM. However, this **gives no consideration to the impact on plan-enabled or feasible housing capacity in the extensive areas of the city operatively zoned RMD** which will change to MRZ, **nor the areas zoned for HRZ** around key activity centres. This limitation selectively excludes potentially smaller, more centrally located sites (existing RMD-zone) which are likely at higher demand than the more peripheral RS-zoned sites. Those smaller RMD sites are more negatively impacted by CCC's proposed recession planes than larger ones, as the increased setbacks and lowered recession planes intersect to cause the feasible building height limit to not necessarily reach the full 12m required by MDRS. If these much more extensive zones (all of MRZ and HRZ) were included in the impact assessment, it would likely show a much greater reduction in the number of allowable and feasible homes. As the true impact of the proposed QM is not known to the public and is likely to be high (given the vast scale on which it's proposed to be applied), the **Sunlight Access Qualifying Matter should be removed from the proposal**.

The arguments that CCC put forward in favour of the proposed QM are deficient. In broader context, the implication that **national laws** should be applied to Auckland, Hamilton, Tauranga, and Wellington as written, but Christchurch – the country's second largest city – with a post-hoc 'calibration' factor is absurd. The rules around NPS-UD and MDRS were clearly considered to apply nation-wide, with enabling legislation passed with supermajorities in parliament backed by all Canterbury and Christchurch MPs, and Christchurch even being mentioned explicitly in the third reading of the MDRS bill⁴. The proposal – embarrassingly – treats Christchurch as though it were some forgettable, large-rural-town rather than the forward-looking, community focussed, youthful and diverse city that I think of it as, and seeks special status as such, which if implemented would – in my opinion – not be lawful, and therefore the Sunlight Access Qualifying Matter should be removed from the proposal.

Additionally, CCC's premise that differences in outcomes between centres having implemented MDRS and NPS-UD can be calibrated-out by simply accounting for the differences in the angle of the sun's zenith on the winter solstice is simplistic and erroneous. Differences in outcomes in indoor and outdoor temperatures and irradiance between centres will be due to myriad of social, geographical, meteorological, and economic factors, not to mention site-specific factors like grade/slope, vegetation, nearby topographical features, to name a few, not just latitude. These site-specific analyses and evidence are required by the MDRS and NPS-UD rules for Qualifying Matters yet have not been assessed for this proposal. CCC's attempt to neutralise those intrinsic differences between centres — by only altering recession planes, such that they create an un-due restriction on density — will therefore be

¹ Proposed Housing and Business Choice Plan Change Section 32 report, Part 2 Qualifying Matters, Part 3, 6.30.24

² Proposed Housing and Business Choice Plan Change Section 32 report, Part 2 Qualifying Matters, Part 3, 6.30.26

³ Proposed Housing and Business Choice Plan Change Section 32 report, Part 2 Qualifying Matters, Part 3,6.30.17

⁴ NZ Parliament – Read Hansard Report – Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill — Third Reading, Transcript 14 Dec 2021

ineffective at 'managing the specific features' (as per NPS-UD), and therefore the Sunlight Access Qualifying Matter should be removed from the proposal.

Other logical deficiencies present in CCC's arguments⁵ for the proposed QM of note include:

- 1. 6.30.8 CCC argue that because multi-storey buildings could be divided into flats with a separate ground floor unit, sunlight access at all floors is an important consideration. However in the proposed ruleset, sunlight access to the ground floor is similarly limited as in the MDRS-compliant ruleset.
- 2. 6.30.9 claims that greater side-boundary setbacks provide "additional climate resilience" without evidence. Runs counter to other attempts to incentivise perimeter-block style development.
- 3. 6.30.11 council claims that MDRS assumes 2.7m high stud, where to date our medium-density sites have been developed to either building-code minimum stud height of 2.4m and/or 2.55m. Not providing for full high-stud development to the required 3-storey minimum building height limit in MRZ zone locks-out higher-quality homes from medium-density development, which will contribute to worsened social outcomes by incentivising spatial separation between socioeconomic groups.
- 4. Sunlight access comparisons between Christchurch and Auckland are based on building heights (of the shaded and the shading building) of only 8.3m (total wall height) not the MDRS-required 9m. In addition, the assumed building form doesn't provide for eaves/overhangs from roof, resulting in worse solar-gain characteristics for houses in summer, worse water infiltration characteristics, and overall less design flexibility for multi-storey dwellings.
- 5. 6.20.12 illustrates sunlight access and misleadingly shades all shaded areas equally as though they are uniformly affected, but the time-weighted average shading would be a different, more accurate, and perhaps less 'fear-mongering' image.
- 6. Sunlight access illustrations neglect other built or natural structures, such as fences and trees, the latter of which could feasibly dwarf the scale of the built structures (native trees such as Totara can reach over 40m in height, Matai 25m, Kowhai 25m, not to mention exotic trees prevalent in Christchurch, examples of which can be found on the schedule of protected trees and include pines, cypress, firs, poplar, spruce, ash, gum trees etc, some exceeding 50m and most of which exceed the MDRS required minimum height limit of 12m) yet have no restrictions such as recession planes or boundary setbacks relating to sunlight access on neighbouring properties.
- 7. 6.30.13 claims that in Christchurch the MDRS rules would create "2 extra months of no sunlight access at the ground floor", without noting that sunlight can be indirect, or occur at times other than at the solar zenith, where oblique direct solar access is possible, depending on the complex 3-dimensional environment. This oblique solar access is perhaps more relevant to residents than access at solar zenith, as many people who work or are otherwise engaged in their communities won't be in their home at noon, and instead will largely experience their home's incident solar radiation only in the mornings and evenings most days. Such nuanced analysis might be possible on a more restricted spatial extent, yet the entire city is included in the proposed QM.
- 8. Sunlight access comparisons between Auckland and Christchurch fail to note that NIWA data⁶ shows mean monthly sunshine hours in Christchurch exceed those in Auckland even in June,

⁵ Proposed Housing and Business Choice Plan Change (PC14) Section 32 report, Part 2 Qualifying Matters, Part 3, 630

⁶ https://niwa.co.nz/education-and-training/schools/resources/climate/sunshine

- the month of the winter solstice, by around 7 hours, 6% more than Auckland's 110 June mean monthly sunshine hours. This extends to 7% more sunlight hours in Christchurch compared to Auckland over the full year. If sunlight-parity between Christchurch and Auckland is the goal, we would probably already achieve it without the proposed QM.
- 9. CCC claim that sun access on the second floor is "reduced from little to none" and that this "forces outdoor living on the top floor". Aside from nothing being wrong with outdoor living on the top floor, and that sunlight access at mid-day is not the only or even necessarily the primary determinant of where best to provide for outdoor living in the middle of winter, and it is untrue that sunlight access on the second floor is "reduced from little to none". All that CCC's illustration⁷ shows, is that:
 - for a few weeks around the winter solstice,
 - if you're in a house with lower-stud-heights,
 - if the day is not cloudy,
 - and neither you nor your northern neighbour have trees,
 - and your site is at the same level as the one directly north of yours,
 - then at around mid-day...

the sunlight that might have otherwise entered your north-facing second-storey window, won't. This **niche moment** is unlikely to feature heavily in the design considerations of a real building's layout.

- 10. 6.30.21 explicitly states that the QM will increase house prices, with "greater sunlight access having a positive influence on property values" and "may have a positive benefit to property values". These are not a valid rationale to achieve an urban environment that is "well-functioning" for "all people and communities" (NPS-UD Objective 1) as it increases wealth inequality between property owners and others, nor is it a valid rationale to achieve "planning decisions improve housing affordability" (NPS-UD Objective 2), and in-fact runs counter to both objectives. In addition, 6.30.26 explicitly identifies a broader impact of the QM as "positive for property values", i.e. higher house prices by approximately \$144,000 or 2.4% of their market value. This is an invalid justification for mandating reduced density. If better profit margins are possible for developments which better attain sunlight, then developers seeking those profit margins may implement those design criteria, without being limited by the planning rules. Prospective residents who want to spend money on that luxury are then free to do so, while the rest of prospective residents might save \$144,000 on their home purchase price.
- 11. In relation to NPS-UD Objective 3, CCC claim to be generously allowing more lenient development within HRZ sites as a result of this QM, where in fact this QM explicitly reduces the viability of HRZ development by enforcing unnecessary recession-planes to an arbitrary building height, with large setbacks at all heights, with no rationale as to why these controls are chosen to address the specific consideration of sunlight access on neighbouring sites, nor assessment provided on the impact on development capacity or viability as a result.
- 12. With respect to NPS-UD Objective 4, amenity values other than sunlight access haven't been considered. As these other amenities, such as housing affordability, proximity to daily needs and employment, efficient public transport etc are not identified by CCC, I consider their assessment of the impact of the proposed QM on NPS-UD Objective 4 deficient, especially considering NPS-UD Policy 6(b)(ii) states that the significant changes to built form required "... may detract from amenity values appreciated by some people but improve amenity values

⁷ Proposed Housing and Business Choice Plan Change (PC14) Section 32 report, Part 2 Qualifying Matters, Part 3, 6.30.13

- appreciated by other people, communities, and future generations, including by providing increased and varied housing densities and types". Little or no consideration for these other amenity values has been given.
- 13. Regarding Objective 6, CCC state the QM is "strategic in nature", but do not provide any valid evidence of this being the case. No publicly consulted council strategy is stated as being enabled under the proposed QM, or if there is one it is clearly in conflict with the national strategies for housing and urban development established under the NPS-UD and MDRS rules. Perhaps most damning, the 'strategy' chapter of proposed plan⁸ makes no mention of 'sun', 'light', or any similarly-worded amenity as part of any stated strategy objective, most notably missing from both 3.3.8 OBJECTIVE URBAN GROWTH, FORM AND DESIGN, and 3.3.10 OBJECTIVE NATURAL AND CULTURAL ENVIRONMENT. Without being "strategic over the medium and long term", the proposed QM violates NPS-UD⁹.
- 14. Regarding NPS-UD Objective 8 **no consideration is given to excessive solar gain** and corresponding cooling requirements, which are perhaps of more relevance than heating requirements considering the future effects of climate change involve aggregate warming temperatures. **The assertion that the proposed QM supports tree planting is unsubstantiated**, and indeed if tree planting is expected between housing units, then the effectiveness of the QM to limit shading on adjacent units should be questioned, as it provides no controls on the scale or positioning of these trees and how they could affect solar access.
- 15. 6.30.26 also states that more restrictive recession planes will provide "views" and which are "commonly associated with increased property values". Again, increasing house values is an invalid rationale for limiting density, as is protection of non-descript "views". Views of an adjacent site's multiple storeys of long-run roofing (conformal to the restrictive recession plane), I would argue, do not feature highly on the hierarchy of amenities valued by Christchurch residents.
- 16. 6.30.27 admits that site-specific characteristics for this QM have not been identified, stating that in contrast to other proposed QM's which are "geographically isolated", this proposed QM has "vast scope". It does not achieve the intent for QM's under MDRS and NPS-UD to be spatially discrete, specific considerations of a given site. Instead, all sites zoned for medium and high-density residential use i.e., the vast majority of residential land parcels are subject to the proposed QM.
- 17. More than 50% of sites in MRZ are <700m2, yet in 6.30.16 the 'typical development site' used for testing the proposed recession plane rules against MDRS-required standard is 750m2, i.e. the test-site is larger than the median affected MRZ site. For HRZ, fully two-thirds of sites are less than 700m2. With the proposed recession planes, these sites' development potential will be kneecapped as the restrictive recession planes cut into the potential building envelope and prevent or severely limit feasible development above 12m. This not only skews the results of the capacity assessment, but the recession plane rules themselves arbitrarily advantage the landowners of large sites at the expense of those holding small sites, reducing the opportunities for competitive market conditions undermining NPS-UD Objective 2: "...improve housing affordability by supporting competitive land and development markets" and reducing opportunities for fine-grained urban form¹⁰.

To conclude, the proposed QM is **designed to undermine the goals of NPS-UD and MDRS** regarding housing density, availability, and affordability, it **lacks site-specific identification or analysis**, is likely to

⁸ Proposed Housing and Business Choice Plan Change (PC14) Chapter 3: Strategic Directions

⁹ National Policy Statement on Urban Development (NPS-UD) 2020 – updated May 2022, Objective 6(b)

¹⁰ https://www.strongtowns.org/journal/2017/10/31/fine-grained-vs-coarse-grained-urbanism

be **ineffective** at achieving its ostensible goal of achieving weather-parity between Christchurch and Auckland, is **not strategic** in the medium or long term, and has an unspecified but highly **negative impact on housing** density and capacity. **The proposed Sunlight Access Qualifying Matter should therefore be removed from the plan.**

Special Character Areas

In general, there is nothing in NPS-UD or MDRS rules which allows for broad swathes of the city to be painted with a 'does-not-apply' brush due to **aesthetic preferences**, without using heritage protections.

While CCC may prefer to define it with different words, "Special Character" outside of the heritage framework is intrinsically ill-defined and fundamentally seems to mean nothing other than the subjective aesthetic preference of some unknown individual. Without some very compelling case, aesthetic preferences should not supersede housing need. However, by restricting density in these areas, council is proposing to constrain permitted housing supply beyond the limits allowed by NPS-UD and MDRS legislation, with the likely effect of inflating prices and reducing availability.

We can also, at the very least, debate which aesthetic preferences should be enshrined in zoning decisions. In this regard, many of the areas in question are, in my view, aesthetically unremarkable, and do not warrant special limitations on development. In some cases, the proposed Character Area rules do nothing to manage or preserve the identified specific characteristics ostensibly warranting protection.

As well as the specific areas below, all proposed Special/Residential Character Areas should be removed from the plan.

Hackthorne Road

The special character area proposed for sites along Hackthorne Road in Cashmere **restricts development along a core public transport route** (#1), in a rare part of the city with northward-sloping grades (which, tangentially, would limit the adverse sunlight impacts on neighbours here if MDRS and NPS-UD density standards were properly applied).

By not allowing increased density here, where public transport service provision is good (see Figure 17 in section: Low Public Transport Accessibility Area for more detail), we would be encouraging growth at potentially low densities elsewhere, with worse local business and employment, and worse public and active transport access, and other negative externalities. That impact runs counter to NPS-UD:

- Objective 8(a): New Zealand's urban environments... support reductions in greenhouse gas emissions
- Policy 1(e): ...have or enable a variety of homes that... support reductions in greenhouse gas emissions
- Policy 1(c): ...have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport

CCC argue¹¹ that the Cashmere Character Area has special characteristics which are at odds with MDRS and NPS-UD requirements for built forms and density allowances, claiming that to develop sites here would not maintain those characteristics. Their identified characteristics are summarised in Table 1, paraphrased for brevity.

 $^{^{11}}$ Proposed Housing and Business Choice Plan Change (PC14) Section 32 report, Part 2 Qualifying Matters, Part 3, 6.29.19

Table 1 The specific characteristics	used to justify the proposed	Cashmere Character Area

Characteristic	Affected by increased density?	Addressed by proposed SCA standards?
Hillside topography	No	No
Large, two-storey dwellings on typical sites	Yes	Yes
Mix of architectural styles, including some from specific periods in the late 19 th and early 20 th centuries	No	No
Some buildings have projections, pitched roofs, timber cladding, "simple but decorative" detailing, and dormers	No	No
Varying setbacks	No	No
Basalt stone street-boundary retaining walls plus large fences and hedges on some sites	No	No
Established front gardens, or no front gardens as "often dwellings are very close to street edge"	No	No
Some buildings have good visual connectivity with the street, others do not	No	No

As evident, none of the characteristics identified are adversely affected by residential density, excluding "Large, two-storey dwellings on typical sites". Nothing about being allowed to build to 11m height implies you must remove a front garden, or the basalt retaining wall at the street, or not build with timber cladding, or dormers, or any other specific features that were identified as defining the character of the area. Indeed, many identified characteristics, even if they were considered somehow consistent across the spatial extent of the proposed QM, are not managed any differently via application of the proposed QM.

Regarding the citation of "Large, two-storey dwellings" as a specific characteristic worth enshrining in the proposed QM, NPS-UD states¹² that:

- (b) ... the planned urban built form ... may involve significant changes to an area, and those changes:
 - (i) may detract from amenity values appreciated by some people but improve amenity values appreciated by other people, communities, and future generations, including by providing increased and varied housing densities and types; and
 - (ii) are not, of themselves, an adverse effect

To imply, therefore, that a small change in permitted built form (3 units, 3 storeys) is, of itself, some adverse effect – thus requiring restriction via a QM – solely because it is different to the previously permitted built form (1 unit, 2 storeys) is, in my view, not consistent with NPS-UD.

The special character area proposed for sites along Hackthorne Road in Cashmere should be removed from the plan.

Beckenham

The SCA proposed for Beckenham is **large** and covers a central suburb, desirable primarily due to its proximity to the city centre and to the Port Hills to the south. However, there is nothing special about the housing in this area that's not also found in nearby Somerfield, or any of the rest of the city built

¹² National Policy Statement on Urban Development (NPS-UD) 2020 – updated May 2022, Policy 6

circa 1930. These suburbs all have a mix of older and newer houses in a normal inner-suburban setting. The "character" is not "special". It's certainly not special enough to warrant the forced retention of low-density housing in an area proximal to the city centre, both the Orbiter and the #1 bus (both high-frequency core routes), and decent cycleway provision along Tennyson through to the city via Strickland/Antigua Street cycleway.

The special character area proposed for Beckenham should be removed from the plan.

Roker and Penrith

The SCA covering Roker and Penrith Streets is at least fairly limited in terms of spatial extent but identifies nothing "special" about the "character" of area that would be negatively affected by increased housing density. These streets are both aesthetically nice, but the aspect that makes them this way is not the ageing and incohesive mix of older and newer low-density houses hidden behind trees and parked cars. What gives these areas particularly valuable character is, only, the regular lining of mature street trees. Increased housing density does not reduce this local amenity, it shares it. The SCA proposed meanwhile, does nothing to protect these trees, it only enforces retention of low-density housing behind them.

Roker is also part of the Quarryman's trail, one of the most-used cycleways in the city, which also serves riders travelling to or from nearby Penrith. Sitting between Sydenham South and Barrington local/town centres and being proximal to the city centre via cycling or other modes, it's an **area perfectly suited for increased density.**

The special character area proposed for Roker and Penrith Streets should be removed from the plan.

Airport Noise Contour

Insufficient range of options considered to achieve the greatest heights and densities.

The Airport Noise Contour (ANC) Qualifying Matter is proposed ostensibly to protect residents of low-density housing within the contour from high sound levels, while serving the second purpose to limit 'reverse sensitivity' - the number of noise complaints directed at Christchurch International Airport from affected residents¹³. Aside from the option of limiting residential density in the affected area, inadequate assessment is given to any other means to "manage the specific characteristics" as required by NPS-UD¹⁴, i.e., mitigate the sound exposure.

In the current District Plan, the effects of aircraft noise are **not** managed via density restrictions affecting the baseline of the zone, but by ensuring dwellings at densities exceeding a zone's baseline are subject to indoor design sound level limits specified in Christchurch District Plan Appendix 14.16.4. Curiously, this **existing mechanism does not protect residents** from high sound exposure if their dwelling is compliant with the permitted activities within the operative Residential Suburban zone i.e., is low-density (2 dwellings per site, 8m / 2 storey building height limit), and could therefore be considered ineffective at present at protecting residents from high sound exposure. **It does, however, limit the number of dwellings** (to below MDRS standards), and therefore limits the number of residents in the affected area, likely reducing the 'reverse-sensitivity' effects on the airport.

Two alternative options, which would instead achieve both goals of the ANC would be:

¹³ PC14 Section 32 report, Part 2 Appendix 3 – Carry Over Qualifying Matters

¹⁴ NPS-UD 2020 – updated May 2022, Subpart 6, 3.33 Requirements if a qualifying matter applies, 3(b)(iii)

- make all relevant activities within the ANC Restricted Discretionary, contingent on their meeting the indoor design sound levels already specified in the operative Christchurch District Plan¹⁵, or,
- re-zone sites within the ANC to MRZ, HRZ or any other zone that would otherwise apply, and amend those zone's rules to require any permitted activity within the ANC to meet the indoor design sound levels already specified in the operative Christchurch District Plan

In either of the above cases, we could instead require "any bedroom to be designed and constructed to achieve an external to internal noise reduction of not less than 35 dB" or some other suitable fixed-attenuation, similar to residential activities within commercial and mixed-use zones¹⁶.

Not only would either of these protect residents and users of all new occupied buildings from exposure to high sound levels without excessively limiting the density in the area, in-so-doing they would also limit the reverse-sensitivity effects on the airport. They would maintain some consistency with the current district plan but extend the protection from high sound exposure to residents of low-density dwellings. Sites within the ANC could then be zoned such that they were consistent with MDRS and NPS-UD, enabling greater housing capacity in an area of Riccarton/Fendalton which the TPG report highlights as central to the locations of feasible medium density development (refer to Figure 8 and Figure 9).

Riccarton Bush Interface

This proposed Riccarton Bush Interface (RBI) Qualifying Matter limits the density of dwellings in the affected area, ostensibly to protect the amenity of Riccarton Bush. If we ignore for the moment that allowing more homes doesn't reduce an area's amenity, but shares it, there are several other reasons why this overlay should not be considered a Qualifying Matter.

Overestimated impact of intensification

Pūtaringamotu Riccarton Bush Heritage Landscape Review 2022¹⁷ - used by CCC to provide rationale for the QM¹⁸ - asserts that "Views of Pūtaringamotu from neighbouring streets", "Visual connectivity between Pūtaringamotu and other planted elements", "an element across the skyline", "View of distinctive tall podocarp trees", and "Views to Pūtaringamotu for residents and passers-by" all would be negatively affected by implementation of NPS-UD and MDRS, and that limiting building heights in the affected area to 2 storeys equates¹⁹ to "protection of outstanding natural features" and "historic heritage" from inappropriate subdivision, use and development under RMA Section 6 (b) and (f). If views from neighbouring and distant sites are indeed significantly impacted as suggested, there remains no evidence that this constitutes any use, subdivision, or development of the outstanding natural feature or historic heritage, and can therefore not be "inappropriate subdivision, use and development" of said natural feature or historic heritage.

I would also contest the idea that views – of what are in most cases the top metre or so of distant podocarp trees poking up behind the rooflines of existing houses, largely **indistinct** from various street-

¹⁵ Operative Christchurch District Plan Appendix 14.16.4

¹⁶ Proposed Housing and Business Choice Plan Change (PC14) Chapter 15 Commercial, 15.4.1.1 Permitted activities P12, P21; 15.5.1.1 Permitted activities P12, P21; 15.10.1.1 Permitted activities P27.

¹⁷ Proposed Housing and Business Choice Plan Change (PC14) Section 32 report, Part 2 Appendix 43 Pūtaringamotu Riccarton Bush Heritage Landscape Review 2022

¹⁸ Proposed Housing and Business Choice Plan Change (PC14) Section 32 report, Part 2 – Qualifying Matters, Part 2, section 6.11.4 – 'Reason the area is subject to a qualifying matter', cites "supporting technical reports".

¹⁹ Proposed Housing and Business Choice Plan Change (PC14) Section 32 report, Part 2 Appendix 43 Pūtaringamotu Riccarton Bush Heritage Landscape Review 2022, section 5.3

trees and private plantings – constitutes some 'outstanding natural feature' in of itself. Riccarton Bush proper, yes, and the heritage items within the heritage-protected setting of Riccarton Grounds, such as Riccarton House and significant trees, but the limited, indistinct, interrupted and generally unimpressive views of distant treetops "currently available down driveways²⁰" are not in themselves the outstanding feature here. And since Riccarton Bush, House, and significant individual trees are protected from development by designation and council-ownership, permitting medium or high-density housing in nearby sites is not a degradation of any amenity value provided by the open space, outstanding natural features, or heritage items.

The Riccarton Bush Interface Area Qualifying Matter should be removed from the proposal, as the true amenity of Riccarton Bush and Grounds is unaffected by increased residential density.

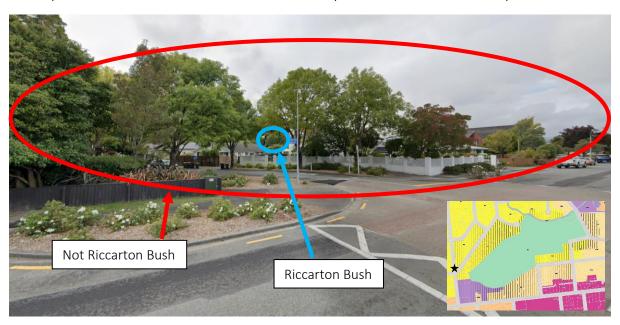


Figure 1 "Distinctive" view toward Riccarton Bush from the intersection of Puriri Street and Totara Street.

Inconsistent with NPS-UD

NPS-UD allows for QMs to restrict development in some locations, such as "open space provided for public use, but only in relation to the land that is open space" (NPS-UD 2020 3.32 1 (d)), or "an area subject to a designation or heritage order, but only in relation to the land that is subject to the designation or heritage order" (NPS-UD 2020 3.32 1 (e)). Yet the Pūtaringamotu Riccarton Bush Heritage Landscape Review 2022 5.3, used to justify implementation of this proposed QM over the proposed spatial extent, cites reasons such as "loss of greenspace adjacent to Pūtaringamotu"; with the proposed QM then specifically applying a density control to sites not included in the protected extent of either Riccarton Bush, nor the surrounding grounds of Riccarton House, nor land zoned as open space.

Furthermore, CCC state in their Section 32 report²¹ that another option that would limit the extent of the proposed QM to only those sites immediately adjoining Riccarton Bush (instead of the multi-block-coverage QM proposed), would have the effect of "...ensuring that Riccarton Bush is protected from the effects of medium density development" and that "the values of Riccarton Bush itself would not be

Proposed Housing and Business Choice Plan Change (PC14) Section 32 report, Part 2 Appendix 43 Pūtaringamotu Riccarton Bush Heritage Landscape Review 2022 5.3

²¹ Proposed Housing and Business Choice Plan Change (PC14) Section 32 report, Part 2 – Qualifying Matters, Part 2, 6.11.12 Table 19

degraded", and "this approach is effective at addressing the issue". This options assessment shows plainly that least one option is available to better "achieve the greatest heights and densities directed by Policy 3, while maintaining the specific characteristics" of the area, as required by NPS-UD²².

The proposed Riccarton Bush Interface Area Qualifying Matter should be removed from the proposal, as it is inconsistent with NPS-UD.

Ineffective at managing claimed 'specific features'

Even if we are to accept (though I don't think we should) that these views are somehow worth sacrificing homes for, in many cases the proposed QM does no more to protect them than without the QM. For example, from Riccarton Road even the existing District Plan allows for construction obscuring all visible parts of the distant and indistinct Riccarton Bush. Meanwhile on Kahu Road, the roadway divides the residential sections from Riccarton Grounds. Any views of Riccarton Bush or House or Grounds are unaffected by increased residential density here, aside from being shared more widely with more residents.



Figure 2 Possible built forms on Riccarton Road from current district plan. Source: CCC Proposed District Plan Change 14, Section 32 report Part 2 Appendix 43, Figure 27



Figure 3 Possible built forms on Riccarton Road from 20m HRZ zoning (like PC14 proposal without RBI QM). Source: CCC Proposed District Plan Change 14, Section 32 report Part 2 Appendix 43, Figure 29



Figure 4 Possible built forms on Kahu Road under existing District Plan. Source: CCC Proposed District Plan Change 14, Section 32 report Part 2 Appendix 43, Figure 30



Figure 5 Possible built forms on Kahu Road if zoned for HRZ without RBI or ANC QM's. Source: CCC Proposed District Plan Change 14, Section 32 report Part 2 Appendix 43, Figure 32

²² National Policy Statement on Urban Development (NPS-UD) 2020 – updated May 2022, Subpart 6, 3.33 Requirements if a qualifying matter applies, 3biii

Other reasons cited in Pūtaringamotu Riccarton Bush Heritage Landscape Review 2022 as "affecting an area of significant indigenous flora and fauna" include ground disturbance associated with construction damaging root systems, changes to soil hydrology, reduced habitat and corridors for birds, less permeable surfaces, and alteration of microclimates. Few of these reasons are particular to housing of a specific density. For example, most root systems will predominantly exist in the upper-most layers of soil, which would be equally affected by construction of a single-storey house as they would a multistorey one. Regarding habitat and corridors for birds, tree canopy requirements proposed for MRZ and HRZ zoning would apply here, if not for the proposed QM, so tree loss in the sites adjacent to Riccarton Bush would be protected against without resorting to density constraints. The MRZ or HRZ rules would actually offer more protection for trees and landscaping than is currently provided by the Residential Suburban (RS) zoning proposed to remain in effect around Riccarton Bush under the proposed QM, with RS zoning excluding planting requirements from single-unit sites. With respect to permeable surfaces replenishing ground aquifers, both proposed MRZ and HRZ zoning rules require 20% or more of the site provided for landscaping, with buildings not exceeding 50% of the site area. Neither ruleset have specific requirements for surface permeability, though either could without applying density constraints which exceed maxima allowed by MDRS and NPS-UD. Lastly, while I'm not an expert on the differential effects of structures of differing heights on soil hydrology, nor the effects of buildings on microclimates, I suspect these effects are manageable without density constraints, and that the spatial extent of the proposed QM makes no reference to the hydrological catchment of Riccarton Bush.

The proposed Riccarton Bush Interface Area Qualifying Matter should be removed, as it is ineffective at managing even the supposed 'specific characteristics' of the area extent.

High negative impact on housing

Regarding impact, at least 1220 units are prevented by application of this QM in terms of plan-enabled capacity, though this doesn't consider the considerable overlap of this proposed QM with the similarly restrictive proposal for the Airport Noise Contour QM, so is likely to be greater if that QM is excluded.

What isn't evident from this impact assessment is the **desirability of this location**. Riccarton's commercial area is a Large Town Centre – Key Activity Centre with huge commercial and retail activity. Riccarton Road (which the proposed QM area adjoins) plays host to **3 of our 5 most frequent Core public transport services** (#3, #5, and Orbiter) and is poised to upgrade to a Bus Rapid Transit (BRT) or Light Rail Transit (LRT) corridor in the medium term, denoted in the proposed plan by the City Spine Transport Corridor. There is a **Major Cycle Route** (Uni-Cycle MCR) running through Riccarton Grounds, connecting the nearby **University of Canterbury** with Riccarton, Hagley Park, and the central city. According to The Property Group's *New Medium Density Residential Standards (MDRS) - Assessment of Housing Enabled in Christchurch City 2022²³* much of the feasible development enabled under PC14 is **concentrated in Riccarton Central**, due to the significant accessibility values of the area.

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²³ Proposed Housing and Business Choice Plan Change (PC14) Section 32 report Part 2 Appendix 38

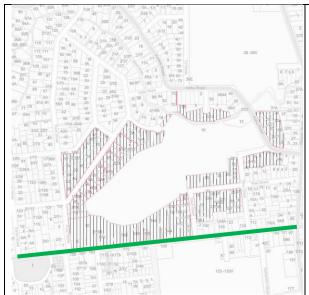


Figure 6 Riccarton Bush Interface QM. Severely restricts density around Riccarton Town Centre zone, the existing very high-frequency bus corridor of Riccarton Road, the planned Rapid Transit line along Riccarton Road, and their walkable catchments.



Figure 7 Airport Noise Contour QM overlaps significant portions of the RBI QM. Both severely restrict density around Riccarton Town Centre zone.

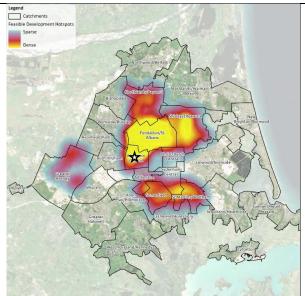


Figure 8 RBI QM is in central part of feasible development hotspots from The Property Group: New Medium Density Residential Standards (MDRS) - Assessment of Housing Enabled in Christchurch City 2022²⁴. Approximate location of Riccarton Bush marked with a star.

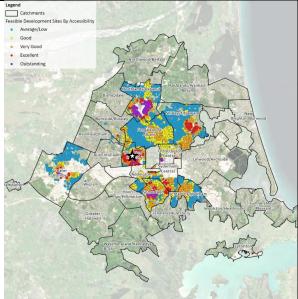
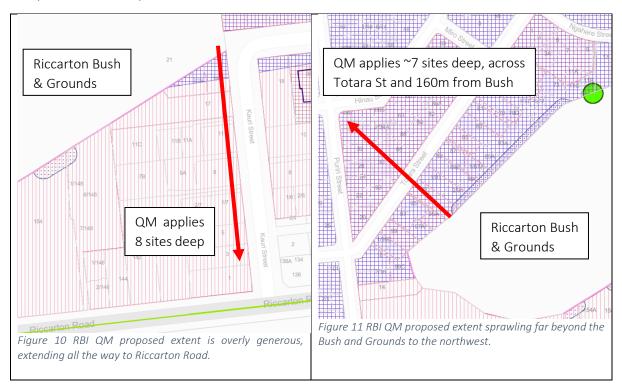


Figure 9 RBI QM is in central part of accessibility hotspots from The Property Group: New Medium Density Residential Standards (MDRS) - Assessment of Housing Enabled in Christchurch City 2022. Approximate location of Riccarton Bush marked with a star.

²⁴ Proposed Housing and Business Choice Plan Change (PC14) Section 32 report Part 2 Appendix 38

Overzealous spatial extent

Aside from the high amenity value of the area in general, the identification of the spatial extent of the proposed QM is over-zealous. For example, on Kauri St's West side, sites as many as 8-deep (1 Kauri St) are proposed for these density restrictions. On Hinau St, not only are the proposed sites not adjacent to Riccarton Bush, but they are on an entirely different block, with Totara St (and any underground services) in between. For example, 67 Hinau St is over 160m from the nearest part of the bush, with as many as 7 other sites plus a road in between.



In summary, the unique characteristics of this area are contained within the existing reserve, not the proposed 'interface area', with public walkways and cycleways permitting extensive access to the public to experience Riccarton Bush, House, and Grounds to experience them from within. Any other alleged amenity value provided to the adjacent sites in terms of obscure and indistinct views of trees are overstated. The true amenity value of these sites is in their proximity to – not their views of – the bush, the commercial centre of Riccarton, the University campus, desirable school zones, Hagley Park, and the City Centre. These amenity and accessibility values are better shared than hoarded and are not diminished with higher enabled density. Any reduction in amenity value within Riccarton Bush, House, Grounds, or to any significant individual trees or heritage items (which have their own standalone protections) that might occur because of applying MRZ or HRZ zoning to within proposed RBI QM area is negligible, and the proposed QM is, as demonstrated by CCC's own options analysis, not consistent with NPS-UD requirements to "achieve the greatest heights and densities directed by Policy 3, while managing the specific characteristics". It is desirable and strategic to increase the number of permitted homes in this area - to a level commensurate with the nearby Riccarton commercial centre and proportionate to the available and planned Public and Active Transport infrastructure. The proposed Riccarton Bush Interface Area QM should therefore be removed or limited to only those specific sites (such as those directly adjoining the Bush) where development at commensurate density may have strong evidence that it would significantly negatively impact the natural or heritage value within the open space zones themselves.

Low-density zones not meeting regulations

Residential Hills Precinct, Residential Mixed Density Precinct – Redmund Spur, and Residential Hills Zone all serve to limit the permitted residential density in the wealthy and desirable suburbs of the northward Port Hills. In addition, Residential Suburban zoning remains in place for large parts of the city. These do not meet the density standards required by MDRS and NPS-UD, and **should be removed from the proposed plan**, or their **rules changed such that their density limitations are no more than permitted by MDRS and NPS-UD** rules.

MDRS arguments

As the density restrictions in Residential Hills Precinct, Residential Mixed Density Precinct – Redmund Spur, and Residential Hills Zone exceed the limits defined under MDRS, and are not attributed to any Qualifying Matter, they are **not allowed by MDRS legislation and should be removed or revised.**

In addition, Residential Suburban zoning is included in the proposed plan, despite those rules limiting permitted density in affected sites to below MDRS standards. In large part this zoning is not the effective limit to density, as in all cases council also propose an overlapping, equally restrictive Qualifying Matter. However, many of those proposed Qualifying Matters have tenuous evidence/rationale and should themselves be removed from the plan or substantially adjusted. If **QMs are removed or adjusted, it is important to also re-zone the underlying sites** to a more appropriate zone which complies with NPS-UD and MDRS, such as MRZ, HRZ, etc. to **ensure that density restrictions exceeding MDRS and NPS-UD allowances are eliminated** from the plan.

NPS-UD arguments

The sites in the predominantly north-facing Port Hills covered by the proposed Residential Hills Precinct, Residential Mixed Density Precinct – Redmund Spur, and Residential Hills Zone also enjoy excellent and unique amenity values – such as elevated views of the city, plains, mountains and ocean, and access to natural landscapes of the Port Hills above – reflected in their higher capital values (see Figure 12) compared to much of the rest of the city. These high values are evidence that these areas have "high demand for housing or for business land". NPS-UD Objective 3c requires that "...district plans enable more people to live in..." such areas.

These same unique amenity values also create a somewhat isolated land and development sub-market compared to the rest of the city. The proposed zoning reduces the otherwise-plan-enabled housing capacity for this sub-market, inflating housing unit price despite theoretical surplus housing capacity existing elsewhere. NPS-UD makes clear – through *Policy 1(a)(i): ...have or enable a variety of homes that...meet the needs, in terms of type, price, and location, of different households* – that such unit price inflation due to council-imposed supply constraints does not represent a "well-functioning urban environment". Therefore, these zones and precinct run counter to both:

- Objective 1: New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future
- Objective 2: Planning decisions improve housing affordability by supporting competitive land and development markets.

To conclude and re-iterate: the Residential Hills Precinct, Residential Mixed Density Precinct – Redmund Spur, Residential Hills Zone, and RS zone should be removed from the proposed plan, or their rules changed such that their density limitations are no more than permitted by MDRS and NPS-UD rules.

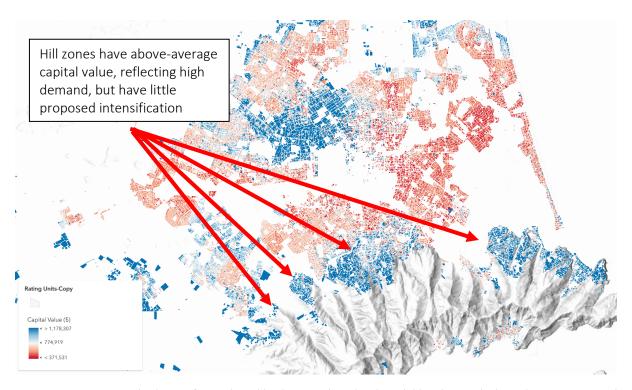


Figure 12 Average capital valuation for residential land across Christchurch, with blue showing higher values. Data mapped from CanterburyMaps Open Data portal https://opendata.canterburymaps.govt.nz

Errors in application of Qualifying Matters

Low Public Transport Accessibility Area

Overlaying the map of actual public transport services with the proposed 'Low Public Transport Accessibility Area' (LPTAA) Qualifying Matter shows very clearly that much of the proposed spatial extent has some public transport service, some of it even excellent.

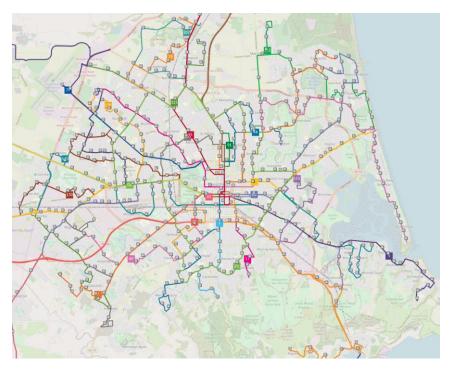


Figure 13 Existing Christchurch bus network of the contiguous urban area, courtesy $\underline{\text{https://go.metroinfo.co.nz/mtbp/engb/arrivals/content/routes}}$

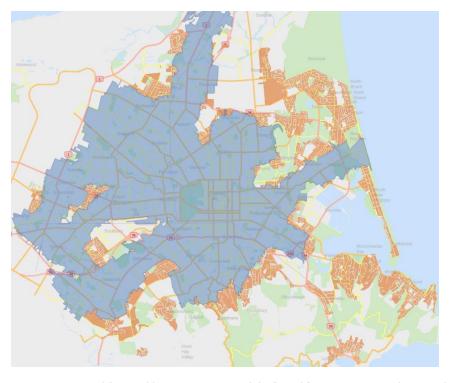


Figure 14 Proposed "Low Public Transport Accessibility" Qualifying Matter spatial extent, shown in brown/orange.

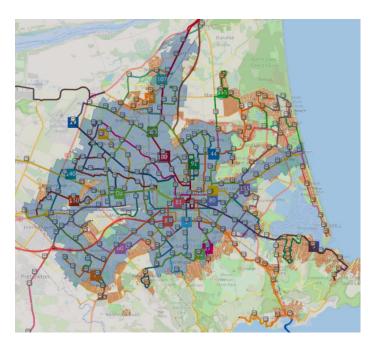


Figure 15 Approximate overlay of LPTA QM and actual PT network showing large parts of the proposed QM extent, despite being on the city periphery, are already served by – sometimes excellent – PT services

Affected communities served by Core Bus Routes

While I feel this proposed Qualifying Matter shouldn't have to exist, since we shouldn't be planning for new residential developments which either do not or are never planned to have reasonable public transport access, I can accept that in some instances – due to, for example unsustainable legacy urban growth patterns – that this may be a necessary restriction.

However, as currently planned many specific areas affected by this overlay are **not** disproportionately lacking accessibility via public transport – many are in fact currently **within walkable catchments of one or more of our all-day high-frequency Core Bus Routes**. Examples include:

- Burwood through to Queenspark, served by #7
- Avonside, served by the Orbiter (our most-boarded bus service)
- Cranford Street, between Innes and Main North Roads, sees the Orbiter, #91, #92, and #28 pass through it
- Sumner, served by the #3, our most-frequent bus service
- Centaurus Road around Major Aitken Dr and Bowenvale Ave, as well as Eastern Terrace in Beckenham, served by the Orbiter
- Cashmere, around Cracroft Reserve, is served by every other bus on the #1 route

In these cases, the application of the QM to these areas appears clearly erroneous, as CCC's first criteria for which the QM would NOT apply (Residential areas within 800m walk from High Frequency (Core) Routes) is not true. Despite the criteria themselves being seemingly arbitrary (as discussed below), to not even apply said criteria when identifying the spatial extent of the proposed QM is, at-best, *highly questionable*, and is a clear failure from CCC to evaluate "the specific characteristics on a site-specific basis to determine the spatial extent" (NPS-UD 3.33 3bii) for this proposal – thus failing to meet the requirements for a Qualifying Matter.

The Low Public Transport Accessibility Qualifying Matter should be removed from the proposal because its spatial extent is incorrectly identified, including some of the city's premier public transport routes.

Affected communities served by Future Core Routes

Other examples include several communities served by 'future-core' services – those that are currently planned to be upgraded to all-day high-frequency routes within the planning horizon of the Christchurch PT Futures programme.

- Casebrook-Northwood, Heathcote Valley, and Lyttelton, all served by the #28. Stage 2 of Christchurch PT Futures plans for enhancement of this route to a high-frequency Core route.
- Shirley through to Southshore, served by #60. Stage 5 of Christchurch PT Futures plans for enhancement of this route to a high-frequency Core route.

Though these 'future-core' services are, inexplicably, not included in CCC's seemingly **arbitrary criteria**²⁵ identifying the spatial extent of the proposed QM, they do provide extremely functional PT connections at reasonable frequencies and are in the process of being upgraded to Core routes, in accordance with the Christchurch Transport Plan and the Greater Christchurch Public Transport Futures plan, to be completed within the next 6 years. The communities which these routes serve should therefore NOT be excluded from intensification rules on the basis of poor public transport accessibility, as they currently have better public transport than many other areas and it's only planned to improve.

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

Affected communities served by City Connector or other services

Lastly, several other communities which – though not as extensive as anyone would like – do have existing provision of public transport. These are services which could practicably be upgraded for higher frequencies and/or capacities and/or better/more stop locations over time with the developing urban form of the city.

- Mt Pleasant, served by the #140
- Westmorland, served by the #44
- Halswell south of Sparks Rd, served by the #100
- Racecourse Rd, sees the #140 and #86 along Yaldhurst Rd, and is served directly by the #130 connecting to both Hornby and Riccarton.

While the #140 route is planned to be re-routed (according to Greater Christchurch Public Transport Futures plan) and that may be being used as by CCC as justification for applying the QM to some affected areas (e.g. Mt Pleasant), it seems tough to argue that failure to provide additional services to fill this manufactured gap in coverage is a valid reason to deny intensification to those areas. It's also tough to argue that planned *reductions* in service should be accounted for (when restricting density) but planned *improvements* in service should not. Planned improvements are now funded as part of the Greater Christchurch PT Futures programme²⁶, such as branching core routes to improve coverage and frequency on Orbiter, #1, #3, #5, #7, and improvements in frequency on #28, #44, #60, #80, #100, #120, #125, #130, #140 to highlight a few.

The Low Public Transport Accessibility Qualifying Matter should be removed from the proposal because it fails to account for existing, planned, and feasible public transport provision.

²⁵ Proposed Housing and Business Choice Plan Change (PC14) Section 32 report Part 2 Qualifying Matters, Part 3, section 6.32.1

²⁶ Greater Christchurch Public Transport Futures: Funding boost for Greater Christchurch Public Transport Futures https://greaterchristchurch.org.nz/news/pt-futures-funding-boost

Inconsistent application unrelated to PT provision

Though the argument for implementing these restrictions *might be* that the existing PT services offer insufficient accessibility, that argument would be inconsistent with the fact that many of the affected communities **share identical public transport services as nearby or adjacent communities**, or even communities farther from key activity centres along the same PT route.

For example:

- #1 route on Hackthorne Road equally serves residents within 800m of the Sign of the Takahe as those at the intersection with Dyers Pass Road, but the former is subject to the LPTAA QM despite being further than 800m from any other PT services (Figure 16 and Figure 17), or,
- #28, where Heathcote Valley, Norwich Quay in Lyttelton and Winchester Street in Lyttelton all see largely identical service (ignoring the diamond-harbour ferry though nearly all Lyttelton is within 800m of this, too and the low-frequency #155), yet Norwich Quay is the only one of the three which is not affected by the LPTAA QM (Figure 18 and Figure 19), or,
- #3 route, which serves Sumner's main area (Mariner and Nayland Streets) just as frequently as it does the base of Mt Pleasant, or Main Rd through Redcliffs, or Moncks Bay, or the back-blocks of Sumner (Figure 20 and Figure 21). Yet here, all but the main strip through Sumner are deemed to have low PT accessibility, despite having identical accessibility as each other (and on our most frequent bus service, no less).

The Low Public Transport Accessibility Qualifying Matter should be removed from the proposal because it has been applied arbitrarily, unrelated to existing Public Transport provision.

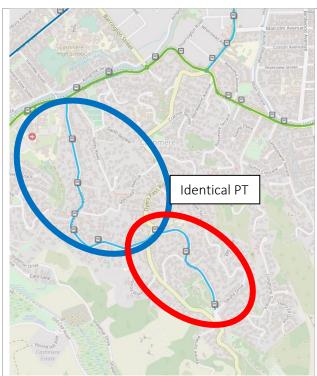


Figure 16 Route #1 along Hackthorne Rd, serves the area at the intersection with Dyers Pass Road identically to the area at Sign of the Takahe

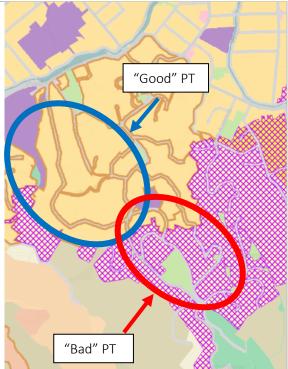


Figure 17 Low Public Transport Accessibility areas (purple hatching) highlighted in red, vs. identical PT provision in blue area. Special/Residential Character Area Qualifying Matter (SCA QM) also proposed within blue zone, preventing densification here too.

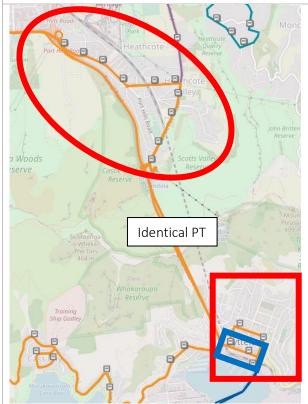


Figure 18 Route #28 serves Heathcote Valley and Winchester Street identically to Norwich Quay

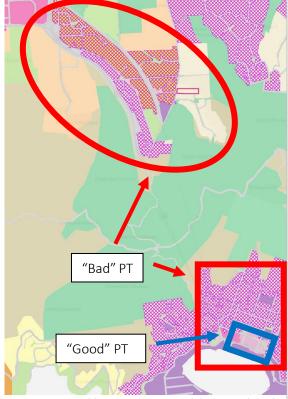


Figure 19 Low Public Transport Accessibility areas (purple hatching) highlighted in red, vs. identical PT provision in blue area.

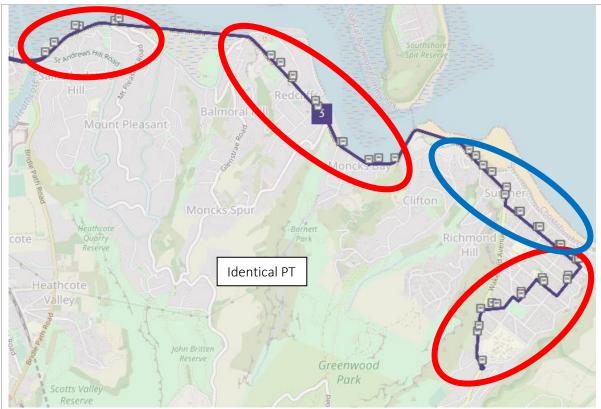


Figure 20 Route #3 equally serves Sumner village and the main strip along Nayland Street identically to Sumner's back-blocks, Mt Pleasant, Redcliffs, and Monck's Bay

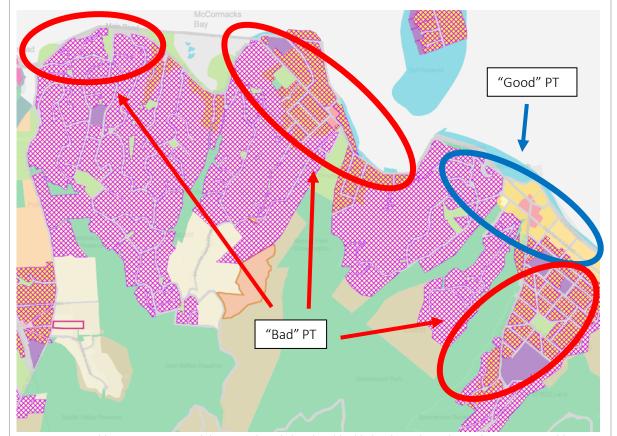


Figure 21 Low Public Transport Accessibility areas (purple hatching) highlighted in red, vs. identical PT provision in blue area.

Inconsistent application unrelated to accessibility

The QM spatial extent is also demonstrably unrelated to broader accessibility, as independent measures of accessibility highlight many of the areas within the QM extent as having good accessibility to a representative range of daily needs.

In their Section 32 report²⁷, CCC use the output from their 'density enablement model' as a crude measure of accessibility, partially to justify²⁸ the vast extent of the LPTAA QM. Their model was not developed to explicitly measure accessibility, particularly the lack thereof, but was developed to score commercial centres for capability to support up zoning beyond MDRS requirements, and in establishing their catchment sizes. Some overlap with accessibility exists, but unfortunately, the improper use of this in-house tool results in some unusual results on close inspection.

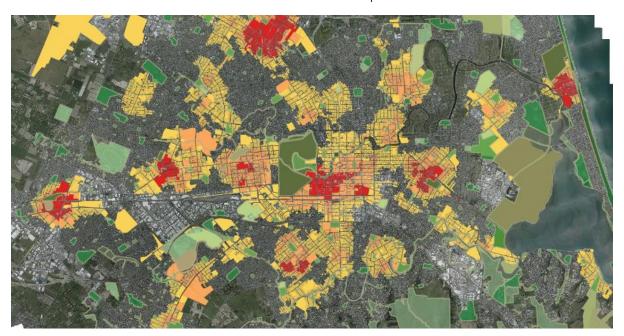


Figure 22 'Density-enablement' model from CCC's Section 32 report

Better measures of city-wide accessibility exist. Researchers from the University of Canterbury have evaluated NZ cities, including Christchurch on a site-by-site basis to find walking, cycling, durations to a range of everyday amenities, and have published (after peer-review) their method and results²⁹.

What their work shows (Figure 23) is that for a representative range of everyday amenities and services, accessibility via walking is excellent in many places which CCC's model excludes or minimises, like Sumner, Redcliffs, Wigram, Oaklands/Halswell, Riccarton, Fendalton, Bishopdale, Merivale/St Albans, and Richmond. Others — most notably Aidanfield — seem to score highly in the CCC model but in reality, consist of literal open fields (see Figure 33), with none of the 'intensification enablers' ostensibly required by CCC's model, except a Core Bus Route.

Meanwhile, accessibility via cycling (Figure 24) is excellent for the vast majority of the city.

The proposed LPTAA QM should be removed, as its spatial extent is inconsistent with poor accessibility.

²⁷ Proposed Housing and Business Choice Plan Change (PC14) Section 32 report Part 1 Appendix 3

²⁸ Proposed Housing and Business Choice Plan Change (PC14) Section 32 report Part 2 (QMs), Part 3, 6.32.3

²⁹ T.M. Logan, M.H. Hobbs, L.C. Conrow, N.L. Reid, R.A. Young, M.J. Anderson, The x-minute city: Measuring the 10, 15, 20-minute city and an evaluation of its use for sustainable urban design. ISSN 0264-2751, https://doi.org/10.1016/j.cities.2022.103924

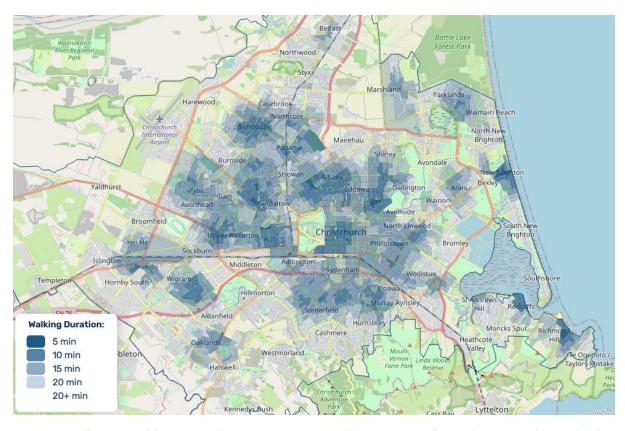


Figure 23 Walking accessibility to everyday amenities, as mapped by University of Canterbury researchers and Urban Intelligence. Image courtesy: https://research.uintel.co.nz/x-minute-city/

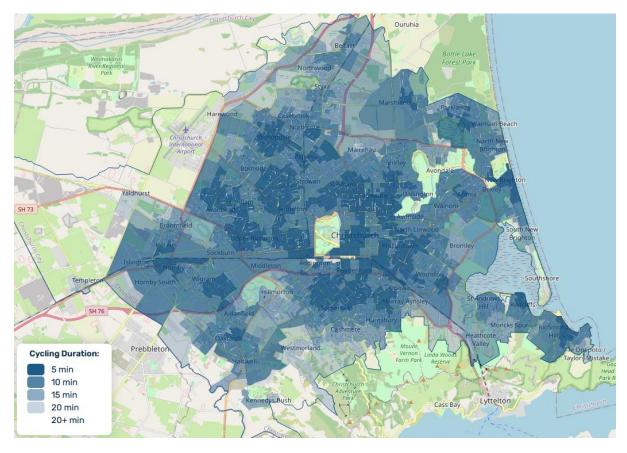


Figure 24 Cycling accessibility to everyday amenities, as mapped by University of Canterbury researchers and Urban Intelligence. Image courtesy: https://research.uintel.co.nz/x-minute-city/

High negative impact on housing

In addition to the inconsistent application, there is a **very high impact** associated with implementing this QM over the proposed extent. Indeed, it is by far the most impactful proposed QM by CCC. In their Section 32 Report, CCC states³⁰ that *"the areas proposed to be subject to this qualifying matter are extensive, covering approximately 12,096 hectares of land"*. They also acknowledge that it reduces total plan-enabled development capacity by as many as 216,280 households (conservatively), or 34,100 feasible dwellings³¹. This is out of an assessed plan-enabled capacity (excluding application of all proposed QM's) of 875,000 (a **24.7% reduction in total capacity**), or a **reduction from the otherwise-feasible capacity of 142,000 new dwellings by 24%**. It's clear that rather than reserving this density restriction to our most peripheral and/or least-easily connected communities, the **proposed Qualifying Matter has been applied extremely broadly**, covering parts of the city which have decent if not excellent public transport accessibility, and are otherwise commercially feasible for new growth.

It should also be noted, that though CCC's impact assessment asserts that plan-enabled and feasible capacity is still "surplus" to demand. Housing demand is not fixed, it is responsive to supply – the response function being the price. Therefore, we cannot accept a reduction in so-called "surplus" capacity without also accepting an increase in housing costs – the latter being an outcome inconsistent with the objectives of MDRS and NPS-UD. We shouldn't be planning for housing 'sufficiency', but for housing abundance, otherwise housing costs will be needlessly elevated.

To summarise, the Low Public Transport Accessibility Area – as proposed – is arbitrarily defined, does not correctly identify its own spatial extent, mis-characterises the public transport services available to affected areas, is unrelated to public transport provision or accessibility, vastly reduces plan-enabled and feasible housing capacity, and will lead to increased housing costs. It should be either scaled down to only cover those rare few, small areas which are inexplicably both zoned for residential uses and are genuinely lacking access to existing, planned, or practicable PT services, or else should be removed from the proposal altogether, due to the small-scale of benefits this QM would offer to the city and affected residents when restricted to a suitable spatial extent.

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³⁰ Proposed Housing and Business Choice Plan Change (PC14) Section 32 report Part 2 Qualifying Matters, Part 3, 6.32.6

³¹ Proposed Housing and Business Choice Plan Change (PC14) Section 32 report Part 1 Appendix 1, February 2023 Greater Christchurch Housing Development Capacity Assessment

Planned density insufficient

Compromised enablement of high density in HRZ

In High Density Residential (HRZ) zones, nominally 14m height, the building envelope is extremely constrained above 12m, via a combination of recession planes, deep boundary setbacks, and restrictive height limits and building separation rules. This will severely limit the feasibility of many developments within the HRZ zone to achieve the scale nominally permitted by the zone.

One mitigating factor is that at the front of sites, below 12m, exemptions for the recession plane, boundary setbacks, and building separation rules are made. While this is good, it is likely to create built forms which could otherwise be enabled under MRZ, if the same front-of-site recession/setback exemptions were to apply. These exemptions to recession planes and setback rules at the front of sites for MRZ were present in earlier versions of the proposed plan and should be re-incorporated.

Regarding HRZ, the current proposal requires parts of buildings exceeding 12m height (3-4 storeys) to have 6-8m setbacks from side boundaries, be no higher than 14m (still only ~4 storeys unless low stud heights are used), be no closer than 10m from an a nearby unit, and if built at the rear of sites be confined to only 12m height and aggressive recession planes. CCC's data (Figure 25) shows average road frontage for HRZ land parcels is only ~20m, roughly translating into the site width (though likely inflated by corner sites). Older sites (pre-1970, i.e. the ones located predominantly around historically relevant town centres, like the city centre, Riccarton, Papanui, etc) are noted as being predominantly only 15m wide.

Medium Density	Average road frontage
Average Road Frontage in Medium Density (All Parcels)	20.3
Average Road Frontage in Parcels 700-900	20.4
Average Road Frontage in Parcels Greater than 900	19.9

High Density	Average road frontage
Average Road Frontage in High Density (All Parcels)	19.8
Average Road Frontage in Parcels 500-700	20.2
Average Road Frontage in Parcels 700-900	19.8
Average Road Frontage in Parcels Greater than 900	19.2

Figure 25 Average road frontage across MRZ and HRZ according to CCC's section 32 report³².

³² Proposed Housing and Business Choice Plan Change (PC14) Section 32 report Part 2 Qualifying Matters, Part 3, 6.30.28 Area and site assessment; page 367

Illustrating what the building envelope might look like under these rules, in Figure 26 the top floor is only (maximally, with low floor-separations) the 5th, and it's only maximally 6m wide. Considering that **building above 3 storeys requires large fixed-cost investments** into additional infrastructure (e.g. elevators, high fire resistance and/or sprinklers, fire engineering, wind report, etc), the limited saleable/rentable floor area from the combined 4th and 5th floors is likely to reduce actual built volume to only 3 storeys; i.e. only the nominal built height of MRZ sites. The building envelope on the right-hand-side shows the more egregious example, using a **typical site from pre-1970's suburbs with a width of only 15m. Such a construction envelope completely rules out a 5th floor, further compromising the viability of building anything above 3-storeys in the HRZ zones.**

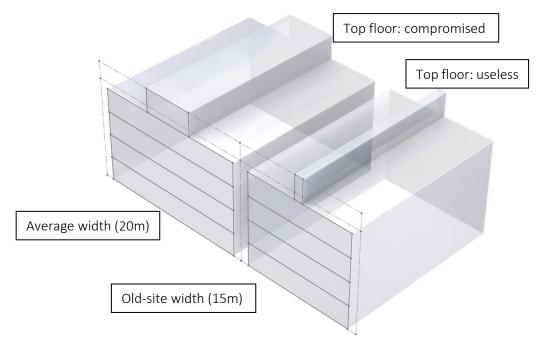


Figure 26 Front-of-site maximal build envelopes for HRZ to 14m height. LEFT: average, 20m wide site and RIGHT: typical pre-1970 site (15m width). Height limit and setback above 12m only allows for \sim 2.8m floor separations on average, and a (sometimes very) compromised 5th floor.

Importantly the site widths used for these illustrations show that **even the average HRZ site is compromised for development above 3-4 storeys** under the proposed rules. That could mean (depending on the statistical distribution of site widths) that around half of all sites zoned HRZ have even less feasible development prospects at heights exceeding 3 storeys. This is problematic in that – in **feasibly enabling only buildings of similar scale to MRZ** – it provides very **little incentive/allowances for development at increased scales/intensity in the areas most suited** to it, i.e. those zoned for HRZ.

In addition to the lack of development incentives exceeding 3 storeys, a low density-differential exists between the buildable envelope – even if built to their theoretical maximum limit – of both:

- An HRZ site built up at the road frontage vs built up along the side or rear boundary
- An HRZ site vs an MRZ site.

The laudable goal of the proposed road-frontage recession-plane waiver for the front 20m / 60% is to encourage development at the front of sites, to help create a vibrant and active streetscape, to help manage overlooking between adjacent sites (without limiting density below legal minimum standards) and to improve privacy for residents, while boosting safety via 'many-eyes' on the street. However, as proposed it only provides a small bonus in habitable floorspace compared to developing the side or rear of the site. Considering that any provision of on-site car-parking or manoeuvring space provided

will come at a cost to habitable area for a front-built site, but not for a side or rear-built site, the proposed waiver may not be sufficient to incentivise development at the road frontage.

In addition — while I would argue that subjective aesthetic ideals should not be included in our strategy objectives (see section: INAPPROPRIATE AND SUBJECTIVE STRATEGY OBJECTIVES) — **if** CCC is aiming to have "legible urban form" with "contrasting building clusters", "appropriate scale, form", and to manage the "clustering, scale and massing"³³ of our more densely populated centres, then allowing built forms of such **similar scale in MRZ and HRZ seems contradictory**.

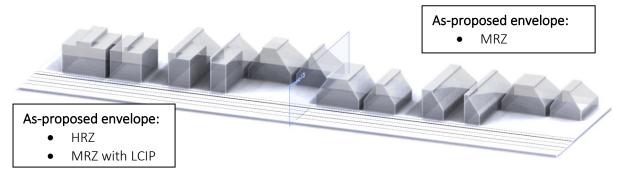


Figure 27 Theoretical build envelopes with 50% site coverage for HRZ (left) and MRZ (right), with alternating site widths of 20m and 15m. Site depth is 40m, creating 600-800m site areas (skewing larger than median parcel size). Road reserve width is 20m. Recession planes are all 3m+55° (the average across all site orientations), and setbacks above 12m are all 7m.

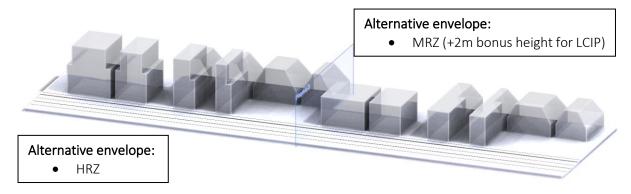


Figure 28 Alternative build envelopes with 50% site coverage for HRZ (left) and MRZ (right). Side/rear HIRTB: $4m+60^\circ$. Front 20m of HRZ sites get meaningful density bonus, with increased height limit of 20m, and exemption from the $4m+60^\circ$ plane, with side/rear setbacks of 3m above 12m height. Front 20m of MRZ sites also get density bonus, with small height limit increase from 11m+1m to flat 12m, plus exemption from the $4m+60^\circ$ plane. LCIP areas in MRZ get 14m height limit and additional permitted units (4 or more).

To remedy this, providing more density in general and density bonuses for development at the front of sites in HRZ, changes could be made to proposed built form standards for HRZ along the following lines:

- change side/rear height-in-relation-to-boundary (HIRTB) rules such that they are consistent with MDRS for MRZ, i.e., 4m+60°, and,
- waive HIRTB recession plane for parts of building in the front 20m of a site (optionally for the
 rest of the site also) which are setback by more than around 3-5m (reduced from 6-8m) from
 side and rear boundaries. This ensures 6-10m separation between upper-level units in adjacent
 HRZ buildings is maintained, and that floor width of upper-storeys remain feasible (at 5-9m for
 site widths of 15-20m). And,

³³ Proposed Housing and Business Choice Plan Change (PC14) Chapter 3 Strategic Directions 3.3.7 Objective – Well-functioning urban environment

- remove the redundant, proposed³⁴ building separation requirement for HRZ, and,
- increase the maximum permitted height within HRZ to 18-21m for the front 20m of a site, for 6-storey enablement in HRZ. Consider retaining 14m permitted height limit for rest of site.
- Increase number of permitted units to at least 6 within HRZ.

Similar density bonuses should be granted for MRZ (especially within Local Centre Intensification Precincts – LCIP) to incentivise development at the front of those sites, and to boost viability of medium density on older, narrow sites. One simple alternative ruleset which might help to achieve this, and which aligns well with the alternative HRZ built form standards above is to:

- change side/rear height-in-relation-to-boundary rules such that they are MDRS-compliant, i.e., 4m+60°, and,
- waive HIRTB recession plane for parts of building in front 20m of a site (optionally for the rest of the site also) which are setback by more than around 3-5m from side/rear boundaries, and,
- retain current height limits for 11+1m nominal, or 14m if LCIP applies, and,
- Increase number of permitted units to 4, potentially only if LCIP applies.

Addington

It's great to see high-density residential zoning applied in some places, such as the Town Centre Intensification Precinct on the South and East sides of Riccarton. Curiously though, while the extent of this zone extends from Riccarton Rd to Blenheim Rd – the latter of which has no core Public Transport routes – the nearby suburb of Addington – particularly at the intersection of Whiteleigh and Lincoln Roads – is served by two core PT routes, and is proximal to housing, employment, and local retail/commercial/hospitality venues, but has no up-zoning planned – at least none exceeding baseline density requirements of the MDRS.

Addington should be up-zoned to a Local Centre (Medium) and increased density in the surrounding neighbourhood permitted, by implementation of HRZ, or a Local Centre Intensification Precinct, or an equivalent mechanism.

According to NPS-UD 2020 Policy 3d; our district plan must enable "within and adjacent to neighbourhood centre zones, local centre zones, and town centre zones (or equivalent), building heights and densities of urban form commensurate with the level of commercial activity and community services". Given this graduated approach to density around neighbourhood cores is an expected outcome of NPS-UD, we apply this to Mixed Use Zone's also, and should permit increased densities of development adjacent to the proposed Mixed Use Zone, which is served by two Core frequent PT lines.

As proposed, the MUZ zone terminates abruptly in the middle of Addington, most sharply illustrated (see Figure 29) across Clarence Street South, where there is also no buffer around the LCZ zone of building heights "commensurate with the level of commercial activity". I suggest that the Addington Local Centre become at least a Local Centre (Medium), and the area around both it, and around Addington MUZ is changed to HRZ (or at least LCIP), consistent with both NPS-UD and the proposed District Plan Objective 15.2.3 (b)³⁵, i.e., "Mixed use zones located close to the City Centre Zone transition into high density residential neighbourhoods that contribute to an improved diversity of housing type, tenure and affordability and support a reduction in greenhouse gas emissions."

³⁴ Housing and Business Choice Plan Change (PC14) Chapter 14 Residential: Rules – High Density Residential Zone 14.6.2.5 Building separation

³⁵ Proposed Housing and Business Choice Plan Change (PC14) Chapter 15 Commercial, Objective 15.2.3 (b) Office parks and mixed use areas outside the central city

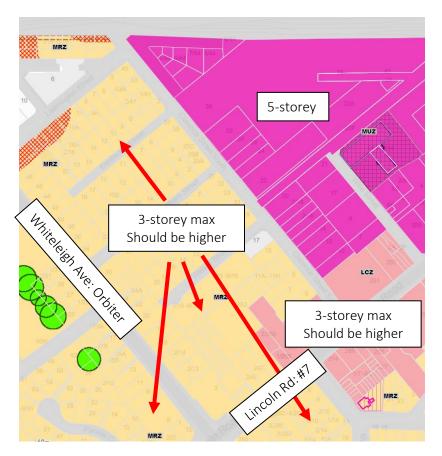


Figure 29 Addington proposed zoning exhibits only 3-storey densities in parts of commercial zone fronting Lincoln Road. Not only should this be higher, bus a walkable catchment of housing should be too. The sharp difference in building densities in the adjacent MUZ is anomalous.

The anomaly here may be due in part to a misapplication of the proposed mixed-use policy³⁶, which seeks of MUZ areas: "...limiting their future growth and development to ensure commercial activity... is focussed within the network of commercial centres". As Addington (and New Brighton for that matter) is such a centre, it is clearly inappropriate. This policy (15.2.3.2) should be revised with respect to MUZ areas adjacent to or forming part of commercial centres, as in Addington's case. The current wording incorrectly implies that all MUZ areas are not within the strategic network of commercial centres, as Addington's is.

Regarding wider impact, since the plan does not currently permit higher densities here than in other parts of the city (not subject to QM's) which are far less-well connected to employment, retail, and entertainment opportunities, it **incentivises growth in those more peripheral areas** rather than preferentially in better connected and more central suburbs. This in-effect undermines the goals of NPS-UD and the (good) motivation behind CCC's (flawed) Low PT Accessibility QM – i.e., that of concentrating growth in central and well-connected areas more economically served with reticulated utilities and transport infrastructure.

This effect is evident looking further down Lincoln Road to Aidanfield, where a new Town Centre Zone (TCZ) surrounded by HRZ is proposed on what's now largely farmland. While I'm not opposed to this Aidanfield development (since it is infilling a strange rural exclave rather than sprawling the periphery of the city), it is nonsensical to provide for such intensive development farther away from the city centre

³⁶ Proposed Housing and Business Choice Plan Change (PC14) Chapter 15 Commercial, Policy 15.2.3.2 (a) Mixed use areas outside the central city

before allowing higher levels of development in the existing urban footprint, along the same transit corridor, in the more centrally located suburb of Addington. Both locations share the same Core radial transit route of the #7, but in Addington's case it also has the Orbiter service to connect it frequently with adjacent Key Activity Centres of Riccarton and Barrington. Aidanfield has the #60 to serve a similar function to connect it to Wigram, but that is a lower-frequency line connecting with lower-activity centres. Addington is also a walkable distance to the city centre, a feature lacking in Aidanfield.

Addington Local Centre should be zoned at least as a Local Centre (Medium), and the area around both it and Addington MUZ zoned to HRZ or MRZ with Local Centre Intensification Precinct.

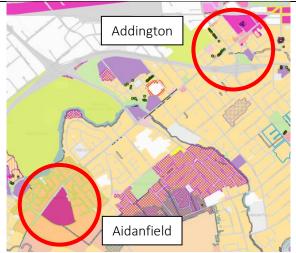


Figure 30 Zoning and positions of Addington vs Aidanfield

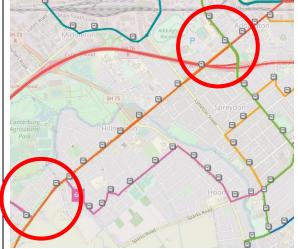


Figure 31 Public transport provision for Addington vs Aidanfield.



Figure 32 Addington, proposal zoned as a "Small Local Centre" for 12m/4 storeys commercial-use, largely adjacent to Lincoln Rd, with no adjacent buffer of commensurate residential density – i.e. adjacent housing only to baseline MDRS standard of 11m/3-storeys. Photo: Google Streetview



Figure 33 Aidanfield, proposal zoned as a "Town Centre" for 20m/6 storeys commercial-use, largely adjacent to Halswell Rd, with \sim 800m adjacent buffer of "High Density" housing, i.e. adjacent housing of up to 14m/4-storeys without resource consent, or 32m/10-storeys with RC. Shares same Core PT line (#7) as Addington but lacks the Orbiter and is 3-4km farther from the city centre. Photo: Google Streetview

Lyttelton

In Lyttelton's case, essentially the entire urban area is excluded from intensification via application of various Qualifying Matters (regardless of their sometimes-dubious merits — see section: LOW PUBLIC TRANSPORT ACCESSIBILITY AREA). This is despite being well connected to public transport (with multiple bus routes and a ferry connection) and offering a broad range of amenities — including hospitality, entertainment, retail, schooling, etc. However, the proposed zoning extent for the Local Centre in this area is limited to only the CBP zone, which is poised to retain existing District Plan rules — i.e., there is no intensification in Lyttelton enabled by this proposed plan. No buffer zone is planned around this Local Centre zone for adjacent residential intensification "commensurate with the level of commercial activity" as required by NPS-UD Policy 3d, despite there being no natural hazard QM or infrastructure QM constraints. Lyttelton should qualify as a Local Centre (Medium) gain commensurate permitted density within the centre and in the surrounding neighbourhood.



Figure 34 QM constraints in Lyttelton are dominated by Low PT Accessibility QM and "character" protections, preventing commensurate up-zoning of sites adjacent to and in walkable catchment of the local centre.



Figure 35 PT access within Lyttelton is quite good, being served by future-core #28 and the somewhat surprisingly frequent Diamond Harbour Ferry.

Sumner

For Sumner, we have a very similar situation as Lyttelton, with good (if not excellent) Public Transport (#3, Christchurch's most-frequent Core bus service), a high degree of local amenities including retail, bars, cafés, a supermarket, and excellent recreation opportunities. However, this high-demand suburb (see Figure 12) is also severely limited in permitted intensification. Adjacent to the LCZ zone is only Residential Suburban Density Transition Zone (RSDT), which retains existing District Plan rules. Along the beachfront blocks we have MRZ zones, nearly compliant with MDRS, but further from the coast the zoning reverts to low-density Residential Suburban Zone (RS). This is curious as the sites further from the coast are at reduced risk from coastal hazards (reflecting in the reduction in Coastal Hazard Risk Management Area priority) yet are zoned at lower densities. The only other difference which could be accounting for the reduced density zoning in the more-inland blocks is the application of the Low PT Accessibility QM to those blocks, despite them having identical PT provision as the rest of Sumner and being well-within an 800m walkable catchment of the LCZ zone. Though I don't think we should necessarily intensify areas at high risk of increasingly severe coastal hazards, the zoning in this area is clearly not in line with the level of risk from natural hazards, nor commensurate with the level of commercial activity as required by NPS-UD. Sumner should be re-zoned to a Local Centre – Medium and gain commensurate permitted density within the centre and in the surrounding neighbourhood.

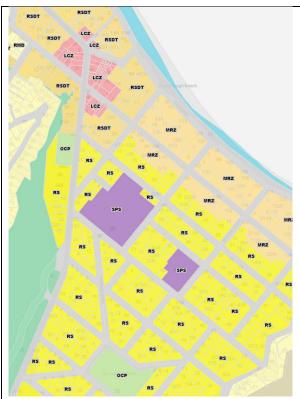


Figure 36 Sumner Local Centre as proposed is insufficiently zoned and has insufficient up-zoning of residential sites in walkable catchment. Sites further from the coast are zoned to low densities.



Figure 37 Sites further from the coast are at reduced risk of coastal hazards, denoted by their coastal hazard risk priority (medium, high, etc).



Figure 38 Sites farther from the coast have identical public transport provision

Sydenham South

In Sydenham South (Colombo Street between Brougham Street and Southampton Street), the Local Centre Zone (LCZ, 14m permitted) South of Milton/Huxley Street has no surrounding buffer zone of intensification "commensurate with the level of commercial activity and community services". The adjacent sites (and walkable catchment) to this LCZ zone are only MRZ, with its permitted building height of only 11m. Suggested change is to up-zone sites within blocks containing parts of this commercial centre to match the building height and density limits of the zone.

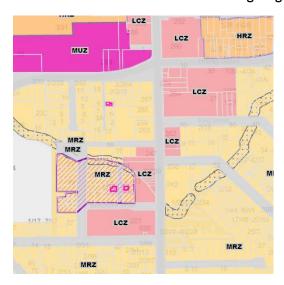


Figure 39 Sydenham South Local Centre is insufficiently zoned and has insufficient up-zoning of sites in walkable catchment.

Wigram

Similarly, in Wigram, the Local Centre Zone (LCZ, 14m permitted) has no surrounding buffer zone of intensification "commensurate with the level of commercial activity and community services". The adjacent sites (and walkable catchment) to this LCZ zone are only MRZ, with its permitted building height of only 11m. Suggested change is to up-zone sites adjacent to this commercial zone to match the building height and density limits of the zone. The Wigram area Local Centre should also certainly qualify as a Medium Local Centre, considering its high number of local amenities including a supermarket, mall, hospitality, cinema, etc, and the surrounding residential area should be up-zoned for commensurate building heights, i.e. 4 or more storeys.



Figure 40 Wigram Local Centre is insufficiently zoned and has insufficient up-zoning of residential sites in walkable catchment.



Figure 41 Existing public transport provision in Wigram shows decent connections currently exist.

Inappropriate and subjective strategy objectives

The strategic objectives outlined in the proposed district plan include some subparts are too subjective, restrictive, and irrelevant to the short, medium, and long-term aspirations of the city's residents. For example, from the proposed objective 3.3.7³⁷ CCC define a well-functioning urban environment as:

A well-functioning urban environment that enables all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future; including by recognising and providing for;

- i. Within commercial and residential zones, a distinctive, **legible** urban form and strong sense of place, expressed through:
 - A. Contrasting building clusters within the cityscape and the wider perspective of the Te Poho-o-Tamatea/the Port Hills and Canterbury plains; and
 - B. Appropriate scale, form and location of buildings when viewed in context of the city's natural environment and significant open spaces, providing for:
 - I. Larger scale development where it can be **visually absorbed** within the environment; and
 - II. Lower heights and design controls for development located in more sensitive environments...

And:

D. The clustering, scale, and massing of development in and around commercial centres, commensurate with the role of the centre and the extent of commercial and community services provided...

The items in bold are emphasised by me. They represent vague aesthetic preferences, speaking to a vision of a remote skyline, or a particular expectation for a streetscape, which isn't valued by all – or probably even most – residents. Nobody is moving to or staying in Christchurch because of these predominantly aesthetic preferences for how the city might look from the perspective of a helicopter.

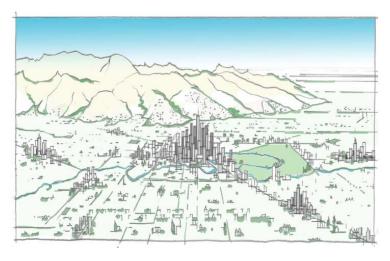


Figure 42 A CCC illustration, with a future-vision for a view of the city which will be available to nearly none of its residents. Source: https://www.ccc.govt.nz/assets/Documents/Consultation/2023/Webinars/District-Plan-Changes/PC14-Public-Webinar-16-February-2023.pdf

 $^{^{37}}$ Proposed Housing and Business Choice Plan Change (PC14) Chapter 3 Strategic Directions 3.3.7 Objective – Well-functioning urban environment

Furthermore, these CCC objectives **contort the NPS-UD policy definition** of well-functioning urban environments³⁸, from:

- (iii) ...have or enable a variety of homes that:
 - (i) meet the needs, in terms of type, price, and location, of different households; and
 - (ii) enable Māori to express their cultural traditions and norms; and
- (iv) have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and
- (v) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and
- (vi) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and
- (vii) support reductions in greenhouse gas emissions; and
- (viii) are resilient to the likely current and future effects of climate change.

to an urban environment which 'functions-well' only if your sole priority is a particular idea of visual amenity.

The CCC-proposed **Strategic Objectives 3.3.7(a)(i)(A), (B), and (D)** are therefore, in my view, subjective, restrictive, and irrelevant to the values and aspiration of the city's residents and **should be removed from the proposal** or **replaced by the NPS-UD definition** of a well-functioning urban environment.

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³⁸ National Policy Statement on Urban Development (NPS-UD) 2020 – updated May 2022, Policy 1

Lack of focus on Public and Active Transport

Though the proposed plan has some prioritisation of density with respect to public transport accessibility and active modes like cycling, but areas with excellent PT and active-modes connectivity should get stronger density bonuses. The current proposal does not go far enough to encourage urban land uses along our best-served, best-connected transport corridors. We should be permitting higher densities — exceeding the new MDRS 3-unit, 3-storey residential baseline — along our corridors best-suited to and already served by good transit and active travel options. These corridors have the best existing capacity for population growth and should therefore be prioritised for said growth. The economical operations especially of rapid, congestion-free, high-capacity, high-frequency public transport largely depend on high intensity urban land uses around station/stop locations — so we should be enabling development of this urban form if we ever want such a well-functioning PT system.

More housing near Core public transport routes

While Christchurch currently lacks a true rapid transit service and therefore misses out on NPS-UD 6-storey heights in station walkable catchments, it is fortunate to have a **comprehensive public transport network** (see Figure 13 and Figure 43) with the capability for fast and direct trips across most of the key centres in the city with one or fewer transfer points. These bus route alignments are simple, navigable, and **easily upgraded for capacity demands**, with route priority improvements an existing, ongoing project, and vehicle capacity headroom with more busses, double-deckers, articulated and/or tram upgrades possible.

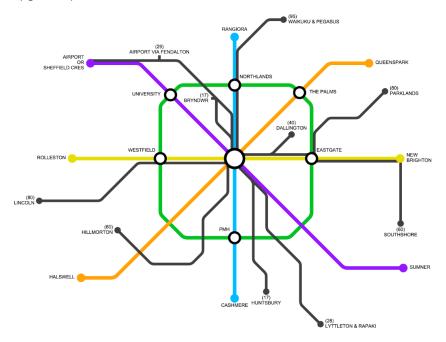


Figure 43 Christchurch simplified existing Core frequent bus network diagram, with "Future-Core" routes e.g. 17, 28, 29. Credit: By Dragonfire2539 - Own work, CC BY-SA 4.0, https://commons.wikimedia.org/w/index.php?curid=40527379

We should be encouraging as much future population growth as possible into these public transport corridors to enable people without being car-dependent, to reduce transport emissions on a per-capita basis, reduce infrastructure costs of sprawl and dispersed growth, and to grow the catchment of the public transport network enabling cost-effective upgrades for all. For these reasons, permitted residential density within walkable catchments of stop locations of our Core Bus Routes (Orbiter, #1, #3, #5, #7, and eventually any future Core Bus Routes such as the #28) should be increased to at least the densities permitted by HRZ zoning (4 storeys or more), such that they are above the baseline MRZ density limits.

More housing near Major Cycle Routes

Similarly, a truly unique local feature of Christchurch's transport infrastructure is the Major Cycle Route (MCR) network.

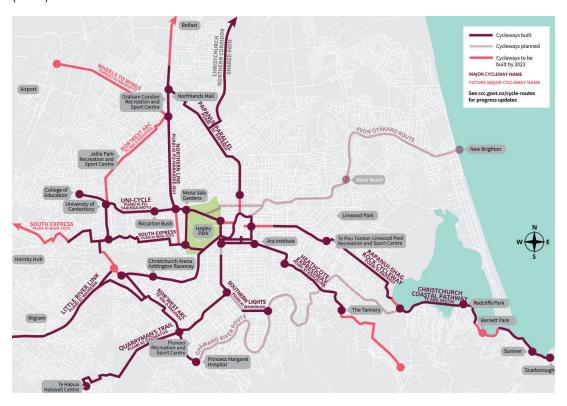


Figure 44 Christchurch Major Cycle Route network. Source: Christchurch Bike Easy Guide and Map, CCC

This system is high-capacity, high-reliability, infinitely frequent, on-demand, zero-emission, and ultra-low-congestion. Many, who both live and work near the network can live car-lite (with for example, only one infrequently-used car between two people) could – without the spatial requirements of large amounts of car-storage – feasibly live in higher density housing topologies without compromising the local transport infrastructure. This makes developments of this kind (mid-rise, car-lite) much more feasible in areas served by the MCR network. Considering the private benefits and overwhelmingly positive externalities that cycling and other micro-mobility produces – such as reduced emissions, improved fitness, reduced congestion, travel resilience, independence for those unable to drive (including children), among many others, we should be maximally utilising our already-built safe cycling infrastructure by increasing the residential, commercial, and employment density in the sites and blocks adjacent to it. If these areas are zoned for any residential use, they should be zoned for HRZ (4 storeys or more) or equivalent density, such that they are above the baseline MRZ density limits.

To pre-empt counter-arguments based along the lines of 'not everyone can cycle', New Zealand ranks among the highest in the world for ability to cycle in the adult population at 82%³⁹. That's not much below the proportion who hold a full or restricted driver's license (~96% of over 15yo⁴⁰), but for cycling the proportion may extrapolate well to children too. Data suggests⁴¹ higher rates of cycling activity in children compared to adults. So, with roughly 82% of the total population being able to cycle, but only ~77% of the total population being able to drive, we see it's likely that more people can cycle than drive.

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³⁹ https://www.greaterauckland.org.nz/2022/08/25/bikes-vs-cars-per-capita/

⁴⁰ Driver's license holders: https://opendata-nzta.opendata.arcgis.com/documents/driver-licence-holders/about
Population: https://www.stats.govt.nz/information-releases/national-population-estimates-at-30-june-2021

⁴¹ https://www.transport.govt.nz/assets/Uploads/Report/Cycling-2015-y1012.pdf

In addition, cycling isn't required of everyone living in medium and high-density housing near cycleways. The fact that many people in these areas will cycle for many of their trips creates the positive externalities (such reduced congestion, storage requirements etc) which make higher density living more feasible for all residents, regardless of their personal travel-mode choice.

Housing near (potential) rail stations

Lastly, Christchurch plays host to a passenger rail station for inter-regional trips. At present this station largely serves tourist markets, though the extant rail network within Greater Christchurch has been investigated for future suburban rail services, and further growth of especially the inter-regional services is entirely plausible. The road link to Dunedin for example is increasingly congested, low resilience, and Air New Zealand manage to make a profit on the CHC-DUN route flying about 7 return trips daily — a trip which, unlike rail, doesn't also service interstitial centres like Ashburton, Timaru, or Oamaru. Considering the rail corridors are already publicly owned, cover large parts of the city, and with much of the fixed infrastructure costs already paid for, they represent an attractive scaffold around which the city and wider region could grow in future without excessive cost burdens for new congestion-free transport infrastructure. Emerging metropolitan centres within Christchurch such as Hornby, Riccarton, and Papanui and Sydenham all lie on this corridor, as do the Rolleston and Rangiora slightly further afield.

Unfortunately, past spatial planning has limited the growth around the rest of the rail corridor such that suburban rail services would likely see low utilisation and limited economic viability if run on the existing rail alignments, at least without lots of new growth in suburbs feasibly served by it — suburbs like Hornby, Addington, Riccarton, Papanui, Sydenham/Moorhouse, and even Heathcote Valley, Lyttelton, Rolleston and Rangiora. This is despite the huge advantages that such congestion-free, safe, rapid travel would provide to those using it, and those benefiting from that many fewer cars on the road, such as drivers, cyclists, pedestrians, and council finances in road maintenance.

This mismatch in location between high urban density and latent high-capacity transport infrastructure will continue to be the case at least until spatial planning allows for higher urban densities within a walkable catchment of these feasible station locations, and/or such time as the rail corridor and services garner new investment — with both requirements currently locked in a chicken and egg scenario preventing progress. Though the immediate priority in public transport investment in Christchurch is rightly on improving the bus network and upgrading the City Spine route for tramway operation, cost-free allowances might be made now for the long-term evolution of the city's urban form and transport network by increasing the density limits in centres proximal to the existing heavy railways.

Even if a dedicated suburban rail system was not built, or new track into the city centre laid, many of these station locations could be feasibly served even by commuter-oriented services serving a dual purpose of inter-regional travel between Dunedin and Christchurch, and commuter services across Greater Christchurch and other Canterbury urban centres like Timaru and Ashburton. Such interregional services seem increasingly likely to form part of a future low-emission, resilient passenger transport system, accommodating future population growth spread throughout the South Island, replacing, or complimenting the many trips currently made by car and plane, and this would help to create a more integrated, resilient, and prosperous South Island economy.

Because of the latent potential of the rail corridor and feasible station locations for passenger services, and the existing lack of urban density proximal to those locations, I suggest that the area around the existing passenger rail station in Addington and around other feasible station locations such as Hornby, Riccarton, Papanui, Sydenham/Moorhouse, Heathcote Valley and Lyttelton, be zoned for at least HRZ, MUZ or equivalent density, such that they are at least above baseline MRZ density limits.

Our proposed Housing and Business Choice Plan Change (14)



	Detai	

Submission Date: 01/05/2023

First name: Philip Last name: Rance

Prefered method of contact Email

Consultation Document Submissions

Provision: Chapter 8 Subdivision, Development and Earthworks

Oppose

I seek the following decision from the Council

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

My submission is that:

I oppose the increased level of housing intensification in areas indicated by the council.

Using my own area as an example (Watford Street / Halton Street in Strowan).

- 1. The level of traffic due to multiple schools will place increased pressure on both vehicle movements and parking in the area with greater intensification. This will lead to additional congestion and a deterioration of the living environment specially for children.
- 2. The area is 'a leafy suburb' the lost of trees (which happens with intensification) and charter homes will destroy the nature and feel of the community together with the loss of natural environment for the bird life.
- 3. The intensification will lead to Christchurch no longer being a different city to those up north. If you are going to live in high density housing area that lacks character i will move north and get paid more. Christchurch attracts people because it is an 'livable' city.
- 4. Apartments and high density living is a fad, people will tire of this and it will be rundown ghetto before too long that will then have to be managed by the council.

Christchurch City Council

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details				
Submission Date:	01/05/2023			
First name:	Murray	Last name:	Walsh	
Prefered method of o	contact Email			
Attached Documents				
		Name		
PC14 Helmores Lane - proposed RCOverlay rules - Novo			4	

PC14 – RESIDENTIAL CHARACTER OVERLAY RULES (PROPOSED)

CCC Summary of Proposed Changes

In recognition of the status of a Qualifying Matter, we propose introducing a resource consent requirement as a restricted discretionary activity, to help us better protect Character Areas. While some infill development will be allowed, we will have more ability to decline a resource consent where the design of a new house, or changes to an existing house, aren't in keeping with the Character Area.

Subdivision will also be more restrictive, depending on the zone and area. For example, within a certain Character Area an additional house may be allowed on an existing site, or to the rear on a new site, but it may be limited to between five and eight metres (one or two storeys, depending on building design). It may require a larger garden and existing trees to be retained, with the house or houses set further back from the street and other boundaries than would be allowed for in a general suburban area.

Rules for the Character Areas will differ depending on the character values of each area, as well as the District Plan zone in which the character area is located. The character values that are already being used to assess any development designs submitted to us are proposed to remain the same.

Proposed Rules (Medium Density Residential Zone)

Activity	Activity within a Character Area Overlay	Activity if not in a Character Area
Status		Overlay
Permitted	Within any Character Area Overlay, the	No equivalent rule – no density limit
	interior conversion of an existing residential	
	unit into two residential units.	
Controlled	In a Character Area Overlay,	
	a. The erection of new residential unit to	
	the rear of an existing residential unit on	
	the same site, where it is:	
	i. less than 5 metres in height; and	
	ii. meets the built form standards applicable	
	to the Character Area Overlay within which	
	it is located.	
	h Ann andication original from this mile	
	b. Any application arising from this rule	
	shall not be limited or publicly notified.	
Restricted	Residential units in the Character Area	No density limit.
Discretionary	Overlay that do not meet Rule 14.5.3.2.7 –	
	Number of residential units per site –	
	maximum of 2 residential units per site.	

Restricted Discretionary	Within a Character Area Overlay: a. The demolition or removal of a building greater than 30m2 on the site, relocation of a building onto the site, erection of new buildings and alterations or additions to existing buildings, accessory buildings, fences and walls associated with that development.	
	b. This rule does not apply: i. where 14.5.3.1.2 C1 applies. ii. to fences that meet the applicable built form standard 14.5.3.2.12 for that Character Area; iii. to accessory buildings that are less than 30m2 and located to the rear of the main residential unit on the site and are less than 5 metres in height; iv. to fences that are located on a side or rear boundary of the site, except where that boundary is adjacent to a public space.	
	c. Activities that do not meet Built Form standard 14.5.3.2.6. d. Any application arising from this rule shall not be limited or publicly notified.	
	Building height controls (dependent on the area, but the current Character Areas have 7m and 5.5 height limits proposed)	In most places, 11 metres
	Character Areas have a range of other special limits on built form, dependent on the values of that particular Character Area, including: - the width of building frontages - landscaping - setbacks (larger than typical) - building coverage - outdoor living space requirements - minimum glazing facing the street - fencing - garaging and car ports - building separation	
	Generally the built form requirements are stricter than the underlying zoning would otherwise allow.	

If these rules are not met, resource consent	
is needed (restricted discretionary activity	
status).	

Proposed Subdivision Rules

Activity within a Character Area Overlay	Activity if not in a Character Area
	Overlay
Minimum net site area for subdivision varies between Character Areas in the Medium Density Zone, but is generally larger than the underlying Zone requirement.	400m2 proposed for the Medium Density Residential Zone or 300m2 proposed for the High Density Residential Zone
In High Density Zone – 400m2.	



Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 01/05/2023

First name: Deborah Last name: BROWN

Prefered method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Oppose

I seek the following decision from the Council

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

15 Cashmere View Street should be a suburban character area.

Resource consent should be required before ANY development can proceed.

My submission is that:

15 Cashmere View Street should be a suburban character area.

Resource consent should be required before ANY development can proceed.



Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 01/05/2023

First name: Simon Last name: BROWN

Prefered method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Oppose

I seek the following decision from the Council

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

15 Cashmere View Street should be a suburban character area.

Resource consent should be required before ANY development can proceed.

My submission is that:

15 Cashmere View Street should be a suburban character area.

Resource consent should be required before ANY development can proceed.



Submitter Details

Submission Date: 01/05/2023

First name: Chris Last name: Wells

Prefered method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Seek Amendment

I seek the following decision from the Council

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

My submission is that:

Cashmere View Street should be recognised as a suburban character area. The street has many well maintained houses with well established gardens and it is inappropriate for the kind of buildings a MDRS zone would allow.

A resource consent should be required for any development to proceed.

Christchurch City Council

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details					
Submission Date: First name:	01/05/2023 Michael	Last name:	Fisher		
Prefered method of contact Email					
Attached Documents					
Name					
Submission on PC				- -	

PC 14 Submission points

M Fisher

May 2023

Provision	Position	Comment	Change sought
14.5.3.1.3 RD14 (b)	Object & seek relief	This makes the provisions particularly onerous for the placement of accessory buildings (such as sheds) to the front or side of the main residential unit.	Change rule RD14 (b) to remove the location requirement for accessory buildings to the rear of the main residential unit. This rule does not apply: iii. to accessory buildings that are less than 30m2 and located to the rear of the main residential unit on the site and are less than 5 metres in height;
14.5.3.2.3 iv. Building height	Object & seek relief	This change makes development and alteration in the Beckenham character area more onerous than the current accepted height limit.	Retain current 8 metre height limit
14.5.3.2.8 (a) i Setbacks	Object & seek relief	This 8 metre setback is a blunt tool particularly as the current design guidance for the Beckenham Character area specifies that dwellings can line up with adjacent dwellings to keep a consistent street scene (even if they are closer to the street boundary). In some areas of the Beckenham character area there are houses closer that the 8 (or 6 metres) which should provide the opportunity for any move or alteration of a dwelling to line up with houses adjacent without breaching the setback provision.	Add extra provision to 14.5.3.2.8 (a) i. as a number 3. 3. except where adjacent residential units are closer to the front boundary.
14.5.3.2.8 a) ii & iii Setbacks	Object & seek relief	The new rules states 2m and 3m side and rear setbacks for the Beckenham Character overlay. This is onerous particularly when the character overlay for Beckenham now been reduced meaning that some side and rear properties (which are not within but are adjacent to properties in the character overlay) are not	Change to 1m for both side and rear setbacks

		subject to the same setbacks and can build 1m from boundaries.	
14.5.3.2.9 (a) Building coverage	Object & seek relief	The requirement for the maximum building coverage is onerous particularly when coupled with the other built form standards in the Beckenham character area.	Change to 50% building coverage



Submitter Details

Submission Date: 01/05/2023

First name: Sulekha Last name: Korgaonkar

Prefered method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Support

I seek the following decision from the Council

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

Retain Ryan Street as a residential character area and the provisions that maintain the streets character.

My submission is that:

I support the inclusion of Ryan Street as Residential Area and the provisions in Chapter 14 that retain its character as a street of predominantly late 1920s early 1930's bungalows.



Submitter Details

Submission Date: 02/05/2023

First name: Glennis Last name: Pattison

Prefered method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Oppose

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area: My concerns are for the general proposed changes.

My submission is that:

I oppose residential areas having any changes from what they were originally planned for many years ago in original planning - residential areas are years in planning and new areas should be the ones to plan for extra housing at commencement of planning a subdivision.

- ie sewerage, water supply, roads, schools etc were for the dwellings on original planning for my area and natural light would be affected to existing houses from new higher closer dwellings.
- ie noise and mental health would be affected for young and old with constant noise from construction.
- ie built up areas can have an detrimental affect on mental health/family life etc



\circ	Contract Contract	Description
Su	bmitter	Details

Submission Date: 02/05/2023

First name: Paul Last name: Cary

Prefered method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Oppose

I seek the following decision from the Council

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

Limit HRZ to the inner city and suburban commercial areas as originally. Ensure onsite carparks are required for all new HRZ and MRZ developments.

My submission is that:

The proposed Plan Change 14 will significantly reduce the amenity values, character and current quality of the our neighbourhood.

Both MRZ and HRZ do not have a requirement for on-site parking for residents. This will add to the problematic street parking which is already significant due to the increasing students, teachers, visitors and construction workers associated with the expanding St Andrews College. The facilities offered by St Andrews College are all used beyond the 8:30-3:30 school hours.

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

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



Submitter Details

Submission Date: 02/05/2023

First name: John Last name: Edilson

Prefered method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Oppose

I seek the following decision from the Council

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

Opposing the proposed changes

My submission is that:

I am writing as regards the designation of Merivale as a large local centre, there by allowing buildings of 6 levels

the issue to me and my neighbours is that

the roads around Merivale are very tight now and often two cars cannot travel down a road side by side, we also have a lot of traffic in relation to the schools also causing parking issues

I have seen myself two cars being side swiped as they drove down a Merivale St.

The intensification makes no allowance for the above and there is a clear health and safety issue and how does the CCC propose to deal with that matter



Submitter Details

Submission Date: 02/05/2023

First name: Tiffany Last name: Boyle

Prefered method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Oppose

I seek the following decision from the Council

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

Revoke the idea of high rise housing buildings in Hornby and work to rebuild existing infrastructure to handle the current demand in the area.

My submission is that:

I strongly object to high rise housing being developed in the Hornby suburb. The infrastructure in Hornby cannot cope with increased housing. As a home owner in the area, no money is spent on fixing current infrastructure problems which I believe is more of a priority than adding in additional housing.



Submitter Details

Submission Date: 02/05/2023

First name: Aaron Last name: Peck

Prefered method of contact Email

Consultation Document Submissions

Provision: Planning Maps

Seek Amendment

I seek the following decision from the Council

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

To reconsider if there should be high density developement allowed around barrington mall like other local centres.

My submission is that:

Around all hubs there is an increased area of development. But there does not appear to be an increase in density around Barrington Mall. Surely like other centres there is an allowable increase in development as well.



Submitter Details

Submission Date: 02/05/2023

First name: Terry Last name: Blogg

Prefered method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Oppose

I seek the following decision from the Council

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

To not implement changes that would see higher density housing in the areas proposed.

My submission is that:

I object to plan change 14 in its entirety for the following reasons: • The process by which the community has been consulted with has caused a general lack of understanding within the community. The documentation provided to the general public has contained numerous misleading and incorrect statements, which have resulted in a vast proportion of the community not able to understand the implications of the changes proposed. • The proposal to increase density in certain parts of the city reflects a misguided and incorrect assumption that there is a need for the level of density proposed, when in fact there is sufficient land zoned for density increase already given the changes already made post earthquake. • Furthermore, increases in density should be focused on the central city and around key hubs such as Riccarton or Northlands • The proposed change has failed to take account of the nature of the existing residential environments. The complete failure of the plan change to assess effects on the residents of Christchurch is incomprehensible. • The poorly conceived application of recession plane concepts has the potential to result in shockingly bad outcomes, and will result in (in many cases), complete loss of sunlight into dwellings and gardens. This will have hugely detrimental impacts on mental health in Christchurch, and will result in the complete loss of the ability of many inhabitants to grow vegetable and fruit gardens in Christchurch's climate. • The complete lack of proper provision to mitigate against privacy effects is disgraceful. • The proposal will result in significant loss of tree and garden cover throughout the city • The proposal reflects a failure to understand how density should be correctly increased across a city • The exemptions proposed, particularly the high accessibility exemption, is based on unsupported conclusions and presumptions. Furthermore, some of the models used contain presumptions that are inconsistent with conditions that actually exist. • Much of the plan change documentation appears to be conceived on the incorrect premise that the change is a surety. • There appears to be a failure to fully understand the implications of the change on the current zoning, and a lack of an assessment of how the proposal will affect existing housing stock • The incomplete assessment carried out by the Council has resulted in proposed changes that will destroy the very character of Christchurch. • The changes proposed do not reflect the wishes of the community and the lack of meaningful consultation is entirely undemocratic. • The proposed changes must be rejected, as they do not reflect the community's need, nor do they properly balance the environmental, economic and social factors as required within the statutory framework.



Submitter Details

Submission Date: 02/05/2023

First name: Melissa Last name: Macfarlane

Prefered method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Support

I seek the following decision from the Council

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

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

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

My submission is that:

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

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



Submitter Details

Submission Date: 02/05/2023

First name: Irene Last name: Marks

Prefered method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Support

I seek the following decision from the Council

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

I fully support that Ryan Street is included as a residential character area with provisions that maintain its character as a street of bungalows (and trees).

My submission is that:

I support that Ryan Street be included as a residential character area

In the councils new modified PC14 plan.

It is great news that the CCC recognizes the historical value of this street

And its bungalows

It's been very disappointing that the Council approved the abomination

Of a "development" at 32 -36 Ryan Street.

Please make it stop at this. Ryan Street is quite low lying and the drainage

Isn't the best. The middle section of the street continues to pool with water

After heavy rain. Any further developments like the one you consented to will

Only exacerbate this problem.

We have lived here for over 20 years and regard it as a special street that should not be ruined by big developments that in the process gets rid of trees and covered in more concrete.



Submitter Details

Submission Date: 02/05/2023

First name: Last name: Hide

Prefered method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Oppose

I seek the following decision from the Council

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

41 Cambridge Terrace - maintain 14 meter restriction.

My submission is that:

I appose any increase in height restrictions in the area/block Cambridge Terrace, Rolleston Avenue, Cashel Street, Montreal street (north).

This is predominantly a residential area and further increases of new buildings will impact natural light, parking in particular if new builds are not required to have on site/off street parking (refer 28 Cashel Street) creating congestion and loss of enjoyment for existing residents, This particular section of Cambridge Terrace is a heavy traffic area.



Submitter Details

Submission Date: 02/05/2023

First name: Mathias Last name: Roehring

Prefered method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Seek Amendment

I seek the following decision from the Council

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

We are seeking a decision from the council to not set the boundary of RS and MRZ within the block between Tauiwi Cres and Ranui St but to move the boundary to either Tauiwi Cres OR Ranui St.

This will remove the conflict of MRZ long-term negatively affecting RS housing, character, privacy, loss of amenity, and loss of value in the RS zone but the nearby MRZ zone.

This will also provide a better opportunity for investors to not only develop properties alongside Ranui Srt but also to cross from Ranui St to Tauiwi Cres. Examples are the recent developments of Gilberthorpes St/Aranui St or Gilberthorpes St/Waterloo Rd. "Plan A" means for us we can stay on site and maintain our life style.

"Plan B" means for us to accept that Christchurch needs to evolve and therefore will change character. At least we can sell if required at a fair price without a financial loss.

Both options are acceptable within the bigger picture.

Please find the attached file for illustration.

My submission is that:

We seek an amendment to the District Plan, Chapter 14.

We are concerned about the plan as it is proposed in the area Hei Hei/Hornby, the "block" between Tauiwi Crescent and Ranui Street. Our property is 28 Tauiwi Cres, which is planned to be RS while right next to our property on the Ranui side of the block the plan is to become MRZ. (Attached file for illustration)

We are supporting the overall District Plan but we see a significant impact on our quality of life and our financial investment. We propose 2 options to amend the plan.

Reasoning with reference to the district plan

14.2.1.2

Tauiwi Cres is within 550m walking distance of a bus route.

Wycola Park, Hei Hei Community Center, and shops are also less than 800m and no different to other qualified areas in the neighborhood. Hornby Primary School is 1.3km but that's not different to Ranui St. or other qualified areas.

14.2.4.3

The plan is to keep the Tauiwi side of the block at low density and the Ranui side of the block at medium density. Per definition, the privacy of a medium-density area can be compromised but the access to privacy of the low-density area must be good and not be compromised.

Right next to a 2- or 3-storey building, the privacy of the low-density area will be compromised though. Not having any windows or balconies at the medium-density developments would be a significant development limitation. Therefore having the boundary within the block is a significant compromise for both sides and causing long term conflicts.

The same applies to landscaping for the low-density area. The low-density area would be compromised from a landscaping perspective.

Therefore the low-density area right next to the medium-density area would significantly disadvantage the low-density area.

14.2.5.4 iv

A low-density area next to a potentially 12m high building is not an amenity at all.

14.2.5.6 b

Mitigating the adverse effects of this planned boundary in the middle of the block is practically impossible or requires major compromise on both sides. The easiest way is to simply move the boundary from the middle of the block to either side.

331ai

Referring back to the strategic directions: With a low-density property right next to a medium-density property and the adverse effects, the investment certainty is not fostered as required in 3.3.1 a ii as a strategic direction. In contrast, our investment seems to not improve but to deteriorate with the boundary in the planned location within the block.

Loss of land value

With the boundary within the block, the quality of life and the land value of the remaining low-density area side will deteriorate. The loss is not recoverable because larger investors would prefer the MRZ and single home buyers will prefer the RS area with no 2- or 3-storey building next to it. That means the RS land on the Tauiwi side will decrease buyer interest.

This financial loss and the deterioration of our quality of life are not acceptable.

The loss can be eliminated or mitigated by moving the boundary to either side of the block. Then the value will not deteriorate because no conflict with different building styles next to each will occur or both sides get equal opportunities for development and even more because investors can develop across the block not only alongside Ranui St. to recover our quality of life we can then invest in another property without financial loss caused by the current plan.

The boundary of RS and MRZ on a street with a natural distance of at least 12m does not cause this conflict.

Attached Documents		
	Name	
Block_Tauiwi_Ranui		<u> </u>





Submitter Details

Submission Date: 02/05/2023

First name: Peter Last name: Ackroyd

Prefered method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Oppose

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area: Remove the HRZ designation from all of the Merivale area.

My submission is that:

What a lot of nonsense this whole exercise is. Why is the Council so craven in accepting so called national standards which are really Auckland centric?

I strongly oppose the designation of large parts of our Merivale neighbourhood as HRZ. In particular who was the smart alec responsible for coming up with this designation for our neighbourhood without consultation or discussion? The whole planning department of the Council should be sacked immediately.

There is a huge amount of intensification happening throughout the city under existing planning laws. We don't need additional requirements for intensification.

As a result of previous planning cock ups the city centre is already suffering from overdevelopment around suburban commercial centres. The aim should be to decrease or minimize residential development around suburban commercial centres - not increase it.

Everyone knows making a submission is a waste of time when there are highly paid city and government bureaucrats with an agenda to follow. What a waste of time and money.

Christchurch City Council

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details					
Submission Date: First name:	02/05/2023 Colin	Last name:	McGavin		
Prefered method of contact Email					
Attached Documents					
		Name			
ChristchurchDistrict	PlanPhotosMay23			₩ .	

Photographs Supporting Submission.

Photo01-WalkingDistance.jpg

Distance walking from Paparoa St to Northlands Mall is 1.81 Kilometres.

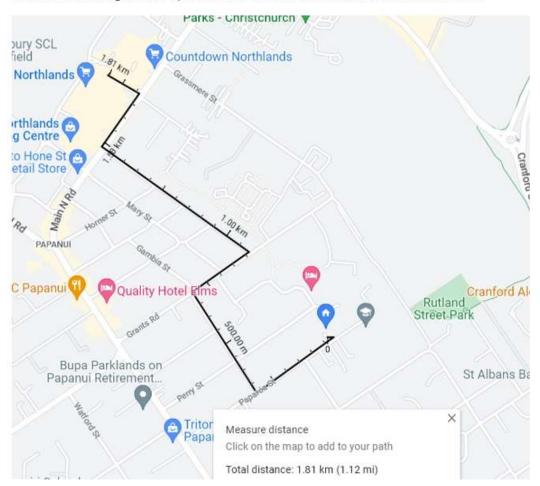


Photo02.TreeLinedStreet.jpg

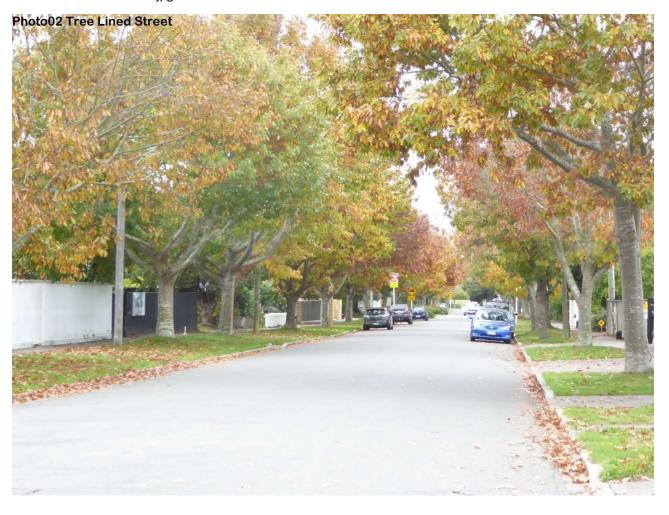


Photo03.Saturday.jpg



Photo04.DuringSchool.jpg



Photo05.MainNorthRoad-2.Jan2008.jpg

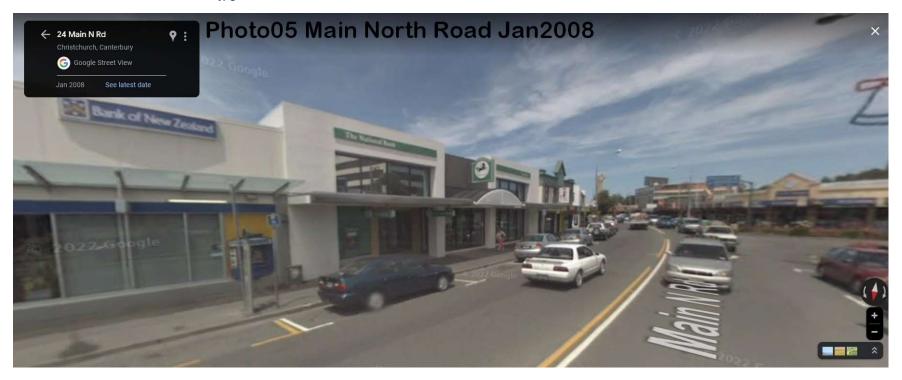


Photo06.MainNorthRoad-2.Aug2022.jpg



Photo07.MainNorthRoad-1.Jan2008.jpg



Photo08.MainNorthRoad-1.Aug2022.jpg



Photo09.LangdonsRoad.Jan2008.jpg



Photo10.LangdonsRoad.Aug2022.jpg



Photo11.PapanuiRd.Apr2023.jpg



Photo12.MainNorthRoad.Apr2023.jpg



Our submission:

Transportation - Walkability

Paparoa St is beyond reasonable walking distance from Northlands Mall. It is completely impractical to walk 1.8 km carrying a weekly supermarket shop. We already notice abandoned supermarket trolleys on streets closer to the Northlands Mall than Paparoa Street. It is also far greater than the Council's own requirement of 1.2 km walkability for the City Centre and smaller walking catchments for other centres (page 12 of Council document 'Have your say on the District Plan Changes').

See attached Photo01.WalkingDistance.jpg

Transportation - Parking

Paparoa Street is being squeezed at both ends by parking requirements, and Paparoa Street is already hazardous for traffic entering and leaving Papanui Road.

In the north, Paparoa Street School is extremely busy with parents dropping off and picking up students. Adding apartments that have no off-street parking requirement will cause significant traffic chaos (and safety risks) during the school terms.

In the south, many (unknown) people use Paparoa Street as an all-day park while they catch the bus on Papanui Road, meaning that street parking availability is very limited. Adding apartments that have no off-street parking requirement will cause significant traffic chaos and frustration.

Community - School Safety

Paparoa Street is host to Paparoa Street School - a high-quality primary school that saturates the parking in Paparoa St during school days. Adding apartments that have no off-street parking requirement (so they park on the street all day) will cause significant traffic chaos during the school terms and seriously impact on parent and child safety.

See attached photos Photo03.Saturday.jpg and Photo04.DuringSchool.jpg

Infrastructure - Water, sewage, stormwater

Paparoa Street was conceived for urban residential living, and has an infrastructure to match. This means that water reticulation and sewage, and electricity supply have been designed with capacity for residential dwellings, not high-density apartment living. Converting Paparoa St to high density living will place an unknown strain on existing infrastructure.

Demographics -Social Impact

The social impact of apartment-living people is undetermined. Apartment dwellers will likely require a lively café and entertainment environment, and a 1.8 km walk to the Northlands Mall and back is unlikely to appeal to apartment dwellers. This is likely to lead to empty apartments, a prelude to a ghetto. We have been unable to locate any City Council research on this topic.

Land Use - Geology

The land quality in Paparoa Street is likely not suitable for high density living. If new two storey houses in this area need four-metre driven piles, what would a six storey apartment block need?

Land Use - Elevation Suitability

The ground elevation at Paparoa Street is 9-10 metres above mean sea level. The impact of future weather and marine events at this elevation is unknown, but the future impact of climate change and sea level rise must be taken into consideration.

Land Use - Earthquake and Liquefaction Suitability

The Tonkin + Taylor liquefaction vulnerability map produced for Christchurch City Council defines the Papanui area (from Mays Road through to Bishopdale) as 'Medium Liquefaction Vulnerability'. The 'Liquefaction Damage Scale' Tonkin + Taylor provide has a scale of 1 to 7 (1 = less damage, 7 = more damage). Normans Road through Chapel Street has a rating of 5 out of 7 — higher damage risk from liquefaction.

Urban Design - Street Scene

Paparoa St and its surrounding streets are visually attractive tree lined streets, typical of those that support the Christchurch image of "The Garden City". They are a pleasant blend of restored 1900s villas and new houses that have been built in a manner that blends new with the old. Removing existing trees and gardens to install high-rise apartment blocks will destroy this image.

See attached photo Photo02. TreeLinedStreet.jpg

Urban Design - Papanui Designation as "Large Town Centre"

Papanui is no longer a 'Large Town Centre', and should now be designated as a 'Town Centre'. In 2008, the Main North Road in Papanui had seven (7) bank branch offices (all with ATMs), an Insurance company and a Post Office. In 2023 it has one bank, one ATM, no Insurance company and no Post Office.

See attached photos Photo05.MainNorthRoad-2.Jan2008.jpg, Photo06.MainNorthRoad-2.Aug2022.jpg,Photo11.PapanuiRd.Apr2023.jpg and Photo12.MainNorthRoad.Apr2023.jpg.

Urban Design - Focal Point of Papanui Town Centre

The current focal centre for the High Density Residential zoning is the "Old Papanui Shopping Precinct" in Papanui Road, Main North Road and the Northlands Mall. The retail shopping focus has now moved to the new shopping precinct (Northlink) on Langdons Road. As a result of this shift of retail, there are now several empty shops in Papanui Road and Main North Road.

See attached photos Photo07. MainNortRoad-1. Jan 2008. jpg and Photo08. MainNorthRoad-1. Aug 2022. jpg, Photo09. Langdons Road. Jan 2008. jpg and Photo10. Langdons Road. Aug 2022. jpg.

Urban Design - Apartment Blocks should be in Clusters

Apartment blocks have their place in a city, but they should be grouped together so that essential services can be designed and provided in bulk, and water runoff from large wet weather events can be properly predicted and managed.

Urban Design - Better Alternatives Available

There are other areas around Papanui that do not have tree-lined streets, have higher elevation and are further from the sea. An arc centred around Northlink Shopping Precinct, starting at Harewood Road and ending on Main North Road would provide a superior alternative option. The land there is farther from the sea, has a higher elevation, and has a lower liquefaction vulnerability. It is also closer to the Christchurch ring road – a major public transport corridor.

Urban Design - Papanui Heritage Designations (Plan Change 13)

Some streets around Paparoa Street are "Memorial Avenues", which have been designated as heritage streets by the 2015 Independent Hearings Panel. The Council has acknowledged this in Plan Change 13 (16 Papanui War Memorial Avenues).

Urban Design - Intermingling Heritage Houses with Apartment Blocks

From both a visual and practical perspective, the intermingling of traditional Christchurch housing in tree-lined streets with apartment buildings is, quite simply, bonkers. This is much more than just 'recession planes'. It is the very essence of Christchurch. Regardless of Government Requirements, this will surely lead to the destruction of Christchurch's "Garden City" reputation.

Land Use - Requirement for High Density Housing in Christchurch

The re-zoning of Paparoa Street and the Papanui area is unnecessary, because there are large tracts of land in Christchurch already zoned high density residential land that are sitting undeveloped. These will take many years to develop and populate, and avoid the requirements to rezone Paparoa Street and its surrounds.

Community - Destruction of Property Values

The first apartment to go up in the general Papanui area will lead to a downward slide of property value across the area. For many people, whose property is their major financial asset, this will cause widespread dissatisfaction.

Decisions Sought:

Given the multiplicity of items of concern, we propose that the boundary line for High Density Residential zoning be along Harewood Road and Main North Road to the North and West, and the area to the South and East of this boundary line is zoned Residential Suburban.

Photos submitted (with acknowledgements to Google Maps for some screen shots):























Submitter Details

Submission Date: 02/05/2023

First name: Aaron Last name: Jaggar

Prefered method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Seek Amendment

I seek the following decision from the Council

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

As per above. List Ryan Street as a Character Street but continue to allow consented developments but not the Governments proposed medium density housing without consent.

My submission is that:

I support the recommendation to list Ryan Street as a character Street and exempt it from there Government's medium density housing rules where 3 properties can be built without consent. I believe that would disrupt the character of the street which is one of the few tree lined streets in the region. It also one best street in 1974.

However, I would not want this decision to block consented development from taking place in the future. The sections are very large and suitable for development including my own which is 1180m2. The region is currently in a medium density transition zone which allows with consented development within the CCC district plan. I would like this to remain in place such is the case with 32-36 Ryan Street where several modern townhouses have been built. The street is close to Te Aratai College, Edmonds Park, transport of Ferry Road and close to Eastgate. This makes the street very suitable for development as per the CCC current district plan.



Submitter Details

Submission Date: 02/05/2023

First name: Sue Last name: Sunderland

Prefered method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Oppose

I seek the following decision from the Council

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

No change to Chapter 14 Residential.

My submission is that:

I object to changes in the plan under Chapter 14 Residential, Higher Density. Christchurch calls itself the garden city that has beautiful trees and a lovely layout. Higher density is in opposition to this. I live in the zone of Merivale that runs from Carlton Mill Road to Rossall Street across to Papanui Road and through to Heaton Street. In this area after the EQs businesses were allowed to operate from residential properties. Turn these back to residential. That was initially the thought behind this allowance in operating a business in a residential zone.

if Chch city wants to implement a change to the Plan in Chapter 14 then do this within the city's four avenues. There are plenty of empty sections here that could have huge residential developments and accommodate high density living. Perhaps if Council contacted the owners Ngi Tahu /developers, etc who are land-banking, to free up their sites to enable building on them.

To put a 4-10 storey new build in an already cluttered neighbourhood like Merivale where the roads are narrow, there is already high traffic congestion from the private and general schools, Merivale Mall, St George's, Nurse Maude and Merivale Village will only exacerbate the problems of a fragile community.

I do not I want a developer knocking down houses to build up to 10 storey residential buildings which will block sunlight, views, remove trees, causing parking issues. We already have trouble getting roading and footpaths repaired in the area. The level of service has spiralled downward and will further deteriorate, if possible, with more crowding and overuse. Reported on many times but no resolution.

If the council has to put high density somewhere then put it in an areas that are void of character as mention above, within the four avenues or in the concrete jungle of Riccarton between Riccarton and Blenheim Roads. This is a view to the future if this planned change proceeds. No greenery, congestion, of traffic, dense housing, untidy ugly zone.

Auckland may need higher density because of its population growth not Christchurch. If the plan is not altered to suit the area concerned then the area will be ruined completely.

Sue and Denis Sunderland



	tter		

Submission Date: 02/05/2023

First name: Bill Last name: Marks

Prefered method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Support

I seek the following decision from the Council

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

Ryan Street should be kept as a character street and no more intensive development as at 32 to 36 where seven units have been crammed on this section. These will result in parking problems and storm water problems in an area that already has flooding problems.

Although some bungalows have had some cladding changes I don't see this as a detraction to it's character status.

My submission is that:

I support the designation of Ryan Street as a Character area.

In my opinion it is a fine example of a 1930's street with it's mostly original bungalows and it's fine trees.

Ryan Street also has had recognition in 1974 when it won an award as a well kept beautiful street!



Submitter Details

Submission Date: 02/05/2023

First name: Anthony William Last name: Norbert-Munns

Prefered method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Oppose

I seek the following decision from the Council

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

My submission is that:

- 1. I wish to join submission number 50982
- 2. Ask CCC to consider making Allister Avenue a one way street running east to west. Leaving present parking as is. There is no room for a two way road even if one side was banned from car parking.
- 3. All right hand turns from Leinster Road+ Allister Ave + Heaton street are stopped. The major build ups in all streets is a serious worry.
- 4.Students in this area I can count in minutes, over 100 at peak times, something will go wrong soon. There are 6 schools in the immediate area then add Christchurch Girls and Boys High School to this.
- 5.A perfect solution would be to block Allister Ave off at the Leinster Road end but imagine that is dreaming. I understand that about 1920 it was blocked to public access. Worth consideration when peoples safety is involved.
- 6.I can be contacted at anytime but I am out of NZ from 12th May until 3 June, 2023.

AWN-M

Support with submission 50982 (neighbour)

SAME FAMILY RESIDENT SINCE 1925

Christchurch City Council

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details						
Submission Date: First name:	02/05/2023 Hebe	Last name:	Gibson			
Organisation: Te Mana Ora/Communi Prefered method of co						
Attached Documents		Name				
SubmissionFINAL230502						

2 May 2023

Christchurch City Council PO Box 73016 Christchurch

Tēnā koutou,

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

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

General Comments

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

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

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

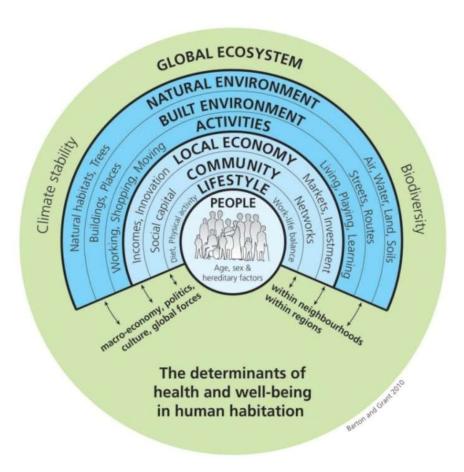


Figure 1: Determinants of health and wellbeing

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

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

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

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

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

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

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

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

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

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

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

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



Specific Comments

Meeting Housing Demands: Climate Change

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

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

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



Health Promoting Neighbourhoods: Community Connectedness and Privacy

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

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

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

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

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

Health Promoting Neighbourhoods: Healthy Streets

- 23. It is also important to consider how neighbourhood design can contribute to social connection and sense of community. Neighbourhoods can influence opportunities for meaningful social interaction, including through the layout of streets, local amenities and public spaces. Places that encourage social interaction are designed to be accessible by all, have destinations for friends to meet, and have 'bumping spaces' for interactions, such as street furniture.¹⁶
- 24. The Healthy Streets Approach is a useful tool for conceptualising how neighbourhood design can facilitate sense of community and social connection. The Healthy Streets Indicators outline aspects of the human experience of being on streets that should be considered when planning public spaces (Figure 2). Te Mana Ora recommends that Christchurch City Council considers incorporating the Healthy Streets Approach into matters of control and discretion to create places that are vibrant and inclusive, where people feel safe and relaxed and there are things to do and see. Considering how to

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

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

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

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

- make places attractive is also important when rezoning areas of the city, such as industrial areas, which may lack such place-making features.
- 25. Introducing higher density housing has the potential to put greater pressure on roads and car parking. Te Mana Ora recommends that the Council uses the Healthy Streets Approach to consider how to make walking and cycling more attractive and challenge car dominance. As noted in the Consultation Document, planning decisions have been based on the 'walkable catchments' of commercial centres so enhancing the walkability of Ōtautahi Christchurch should be prioritised.



Figure 2: The Healthy Streets Indicators

Health Promoting Neighbourhoods: Climate Resilience and Green Space

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

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

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

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

Christchurch City Council has the opportunity to consider how to mitigate this problem before the intensification of development begins.

Residential Heritage Areas

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

Additional comments

Meeting Housing Demands: Affordability

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

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

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

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

Meeting Housing Demands: Diversity, Quality and Accessibility

- 37. As stated in the Consultation Document, Christchurch City Council will consider design in the resource consent process. Te Mana Ora recommends that Christchurch City Council uses the resource consent process to improve the design of new housing developments, including attention to universal design (see paragraph 42) and good ventilation (see paragraph 41).
- 38. While these proposed plan changes will enable more housing and MDRS Policy 1 (14.2.3.2) enables "a variety of housing types with a mix of densities within the zone, including 3-storey attached and detached dwellings, and low-rise apartments", Te Mana Ora encourages Christchurch City Council to consider how to ensure this will be achieved and how increased density and subdivision will provide diversity of housing stock that caters to range of population groups with different needs. Providing a diversity of housing stock and a mix of residential densities can give everyone more choice about where to live.
- 39. New housing developments should cater to a range of household sizes.

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

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

resources/statistics/housing/nousing-register.rumi

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

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

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

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

- 43. Disabled people on the waitlist for public housing in Aotearoa New Zealand who are looking for accessible housing wait 90 days longer than non-disabled people.²³ The average wait time for people who have requested a modified house is 434 days. This confirms the need for more housing following universal design standards. Te Mana Ora recommends that Christchurch City Council considers how to ensure that new housing is both accessible and affordable.
- 44. Te Mana Ora recommends that accessibility plans be required to support quality large scale developments (Policy 14.2.5.3) and other high-density developments or neighbourhoods so that local accessibility needs are understood and provided for.

Conclusion

- 45. Te Mana Ora does not wish to be heard in support of this submission.
- 46. If others make a similar submission, the submitter will not consider presenting a joint case with them at the hearing.
- 47. Thank you for the opportunity to submit on proposed Heritage Plan Change (PC13) and Housing and Business Choice Plan Change (PC14).

Ngā mihi,

Vince Barry

Regional Director Public Health Te Waipounamu National Public Health Service

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



Submitter Details

Submission Date: 02/05/2023

First name: Julie Last name: Kidd

Prefered method of contact Email

Consultation Document Submissions

Provision: Chapter 6 General Rules and Procedures

Support

I seek the following decision from the Council

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

My submission is that:

I wish to comment on qualifying matters, in particular to endorse changes that protect the amount of sunlight buildings are exposed to, at least to a level that is equivalent to the level of exposure of a building in Auckland. As a retired doctor, I am aware of the connection between exposure to bright light and wellbeing, especially mood. Living in a building where there is no exposure to sunlight for 5 months of the year could be detrimental to health, especially for people who have reasons why they are unable to be out of the house for much of the time. I do support the principle of increased urban density of housing stock to allow people to live closer to transport and amenities, but not at the expense of other aspects of health and wellbeing. For this reason, I also support as much being done as possible to maintain tree canopy cover.



Submitter Details

Submission Date: 02/05/2023

First name: Rohan Last name: A Collett

Prefered method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Seek Amendment

I seek the following decision from the Council

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

My submission is that:

The Airport Noise Corridor (which runs between Fendalton/Riccarton to the airport) is not a Qualifying Matter as planes only use this path when the wind direction is north-west or south-east, which according to NIWA records is less than 3% of the time. Omitting this large area of land from MDRS because of detrimental effects from planes flying overhead for 3% of the time seems ridiculous.

That all outdoor living spaces are required to be located on the east, north or west sides of dwellings not on the south side.

That all of the CBD is rezoned Mixed Use to promote diversity of space and help activate the city for longer periods.

Living Hills zone has the density increased by encouraging more smaller units instead of larger single units.

Minimum heights in the High Density Residential area is increased from two-stories to 3-4 stories to better reflect the intended increase in density in these centralised areas.



Submitter Details

Submission Date: 02/05/2023

First name: Curtis Last name: Bush

Prefered method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Oppose

I seek the following decision from the Council

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

Therese Street, Spreydon

My submission is that:

I am writing this submission to express my strong opposition to the creation of a medium density residential zone in our neighborhood. This decision will have a significant impact on our community's living conditions, and I urge you to reconsider this plan.

One of the main reasons why we chose to live in this area is because of its peaceful and quiet nature. However, allowing tall buildings to be built will result in increased noise pollution, reduced privacy, and loss of natural light. It will also change the character of our neighborhood, making it more urban and less residential.

Furthermore, the densification of our area will put a strain on existing infrastructure such as roads, parking, and importantly water services which we often see struggle with consistent rainfall as is, I would hate to see what the effects will be on this struggling infrastructure with increased water catchment from densified construction. The increased population density will lead to congestion, longer commute times, and more pollution, which will have a negative impact on our health and wellbeing.

The proposed development will also impact the local ecosystem and wildlife. The trees and green spaces of existing backyards that provide us with fresh air and natural beauty will be destroyed. This loss of natural resources will have long-term negative effects on the environment and our quality of life.

Moreover, allowing developers to build tall buildings will lead to the displacement of long-time residents who have called this area home for years. These individuals and families will be forced to leave their homes and communities, which will lead to the loss of community connections and cultural heritage.

In conclusion, I strongly urge the council to reconsider this decision to densify our residential area. We chose to live here because of the peaceful and quiet nature of our neighborhood, and we do not want that to change. The negative impact on our living conditions, infrastructure, environment, and community far outweighs any perceived benefits of densification.

I urge you to prioritize the needs and wishes of the residents over what can only be seen and the interests of the consent fee hungry CCC and the developers that feed them.



Submitter Details

Submission Date: 09/05/2023

First name: Terri Last name: Winder

Organisation: Ceres New Zealand, LLC

Prefered method of contact Email

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:

Refer to attached submission.

My submission is that:

Refer to attached submission.

Provision: Chapter 15 Commercial

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:

Refer to attached submission.

My submission is that:

Refer to attached submission.

Attached Documents

Name

J16644 Ceres PC13 and PC14 Submission FINAL 20230508



Submitter Details

Submission Date: 09/05/2023

First name: Terri Last name: Winder

Organisation: Ceres New Zealand, LLC

Prefered method of contact Email

Consultation Document Submissions

Provision: Planning Maps

Oppose

I seek the following decision from the Council

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

Refer to attached submission.

My submission is that:

Due to the ambiguity regarding which provisions are notified under PC13 and PC14, the submitter lodges their submission on both to ensure that it applies to PC13 and PC14.

Refer to attached submission.

Attached Documents

Name

J16644 Ceres PC13 and PC14 Submission FINAL 20230508





Our Reference: J16644

Mark Stevenson Christchurch City Council c/o Engagement Team

Email: engagement@ccc.govt.nz

Dear Mark,

SUBMISSION ON A NOTIFIED PROPOSAL FOR A POLICY STATEMENT OR PLAN, CHANGE OR VARIATION CLAUSE 6 OF SCHEDULE 1 AND VIA INTENSIFICATION PLANNING INSTRUMENT (IPI) IN ACCORDANCE WITH SECTION 80F(1)(a), RESOURCE MANAGEMENT ACT 1991

SUBMISSION ON HERITAGE PLAN CHANGE (PC13) AND HOUSING AND BUSINESS CHOICE PLAN CHANGE (PC14)

Purpose of Submission

This letter is a submission on the Heritage Plan Change ("PC13") and Housing and Business Choice Plan Change ("PC14") proposed by the Christchurch City Council ("Council") prepared by Planz Consultants Limited ("Planz") on behalf of Ceres New Zealand, LLC ("Ceres").

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

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

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

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

Submitters details

Submitter Ceres New Zealand, LLC

Contact Name Swaroop Gowda

Address for Service Ceres New Zealand, LLC

C/- Planz Consultants Limited

PO Box 1845

Christchurch 8140

Attn: Terri Winder

M: 021 225 9323

E: terri@planzconsultants.co.nz

Submission

This submission has been prepared by following the Council's notification of PC13 and PC14 in relation to 25 Peterborough Street, Central City, Christchurch and 87-93 Victoria Street, Central City, Christchurch.

The location of 25 Peterborough Street is depicted in Figure 1. Under PC13 and PC14, 25 Peterborough Street is located within the City Centre Zone (Figure 2) and subject to the following overlays.

- Heritage Setting Setting #281
- Heritage Item Item #440 Highly Significant
- Central City Building Height 32m Overlay
- Significant and other Trees Significant Tree #274.

The location of 87-93 Victoria Street is depicted in Figure 1. Under PC13 and PC14, 87-93 Victoria Street is located within the City Centre Zone (Figure 2) and subject to the following overlays.

- Cathedral Square and Victoria Street Precinct
- Victoria Street Height
- Heritage Setting Setting #296
- Heritage Item Item #529 Highly Significant
- Central City Building Height 45m Overlay



Figure 1 Location of 25 Peterborough Street within orange boundaries and 87-93 Victoria Street within red boundaries (Canterbury Maps)

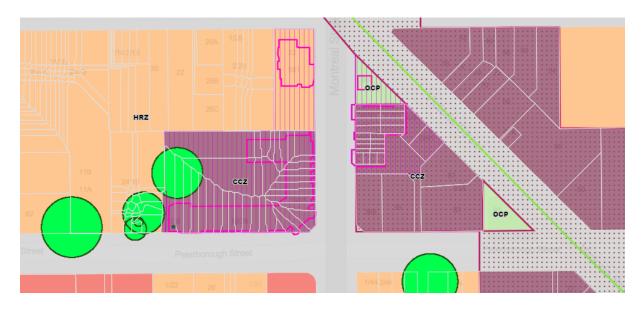


Figure 2 PC13 and PC14 Zoning of 25 Peterborough Street and 87-93 Victoria Street (PC13 and PC14 GIS)

PC13

Chapter 9.3 Historic Heritage

Ceres **oppose** changes to the proposed Chapter 9.3 Historic Heritage (as notified on 17 March 2023) for the following reasons.

Point 1. The proposed policies, rules, matters of discretion, and schedules do not reflect significantly damaged heritage buildings which are uneconomical to repair, restore, and/or reconstruct.

Point 2. Resultant of deleting a rule and matters of discretion relating to buildings which sustained damage in the Canterbury earthquakes of 2010 and 2011, it is unclear how the several significantly damaged heritage buildings in Christchurch which remain in a state of disrepair will be managed from a planning perspective.

Point 3. The retention of Significant Tree #274 impedes the redevelopment of 25 Peterborough Street and, in turn, the use / reuse of the property and building therein.

Point 1

There are several heritage buildings within the city which remain significantly damaged, derelict, and vacant (e.g., 25 Peterborough Street and 91-93 Victoria Street), albeit the city is approximately 12 years post the Canterbury earthquakes.

Policy 9.3.2.2.3 (as notified) seeks for heritage items to be managed in a way that provides for the ongoing use / adaptive reuse of heritage buildings in a manner that is sensitive to their heritage values while recognising the need for works to be undertaken to accommodate their long-term retention and use, and the associated engineering and financial factors. Additionally, this policy seeks to recognise the need for a flexible approach to heritage management, with particular regard to enabling repairs, restoration, and reconstruction, in a manner which is sensitive to the heritage values of the scheduled historic heritage.

However, repairing a significantly damaged heritage building will involve a large volume of reconstruction and restoration work meaning that the resultant building is more likely than not to be a replica, rather than the original heritage fabric. Considering this, short- and long-term financial factors (i.e., repair / reconstruction costs, rental yield, etc.) greatly influence the ongoing use / adaptive reuse of a significantly damaged heritage building. For example, if the cost to repair / reconstruct a significantly damaged heritage building outweighs the long-term financial return then it would be uneconomical to pursue redevelopment options. Consequentially, damaged heritage buildings may be left in a damaged and derelict state or demolished entirely.

Considering the above, this policy (as notified) does not fully recognise the great impact financial factors contribute to the commercial decision of repairing, restoring, and reconstructing a significantly damaged heritage building to foster its use / reuse. Notably, sensitivity towards financial factors seems to understate its influence.

Additionally, Rule 9.3.4.1.5 (NC1) (as notified) does not fully recognise / reflect the need to demolish a significantly damaged heritage building that would be uneconomical to repair, restore, or reconstruct. The Non-Complying Activity status seems excessive / onerous given the nature of the damage sustained by a highly significant heritage item, and cost to repair / reconstruct.

Considering the above, Ceres seek the following decisions:

- a. Create a schedule identifying significantly damaged heritage items which face significant challenges to their ongoing restoration and economic reuse. Given that 12 years have elapsed since the earthquakes, these buildings are well known and able to be readily distinguished from buildings that are habitable and occupied. The list is narrow, is likely to extend to no more than a dozen or so buildings, and could include the following: Victoria Mansions, Peterborough Centre, Harley Chambers (Cambridge Tce), Englefield House (Fitzgerald Ave), Empire Hotel (Norwich Quay), Daresbury (Daresbury Lane), and the Dux/ Student Union building at the Arts Centre.
- b. Add a focussed policy within Chapter 9.3 which better reflects and recognises significantly damaged heritage items (identified in the schedule created as part of point a above) which face significant challenges to their repair and reuse. It is artificial for the policy and rule framework to ignore the post-quake reality that there are a number of significantly damaged heritage items and to not provide any differentiation between how intact and badly damaged buildings are to be managed.
- c. **Add** a Restricted Discretionary Activity provision (RD9) to Rule 9.3.4.1.3 for the repair, restoration, reconstruction, or alteration of a heritage item identified in the schedule created as part of point a above. The Matters of Discretion applicable to this rule will be those detailed in point e below.
- d. **Add** a Restricted Discretionary Activity provision (RD10) to Rule 9.3.4.1.3 for the demolition of a heritage item identified in the schedule created as part of point a above. The Matters of Discretion applicable to this rule will be those detailed in point e below.
- e. Add a Matter of Discretion provision to Rule 9.3.6 relating to the provision of a heritage restoration assessment or a heritage demolition assessment (the latter being applicable if the heritage item is to be demolished); engineering and Quantity Surveying evidence; photographic records; and a deconstruction salvage plan.

Point 2

There are several heritage buildings within Christchurch which remain significantly damaged and vacant because of the various Canterbury earthquakes. The Operative Christchurch District Plan ("Operative Plan") specifically provided Rules and Matters of Discretion relating to the upgrade, replacement, reconstruction, restoration, alteration, and relocation of a heritage item.

However, resultant of PC13, these Rules and Matters of Discretion are proposed to be deleted, or significantly altered so that the resultant effect is entirely different to that of the Operative Plan. This approach seems premature while there continue to be several significantly damaged heritage buildings within Christchurch.

Ceres seek the following decision:

a. **Delete** the PC13 proposed changes to Rule 9.3.4.1.1 (P9) and proposed deletion of P11 and P12 and Matter of Discretion 9.3.6.1.

Point 3

As a consequence of earthquake damage, the heritage building at 25 Peterborough Street may require significant reconstruction (potentially including demolition works) to reuse the building and property. The Horizontal Elm established on the site, which is identified as being significant, is located behind the

existing building and its visibility from adjacent properties and public spaces is largely blocked by built form. The precise location of the Horizontal Elm will highly likely restrict / impede the reconstruction / redevelopment of the building and property by limiting layout and design options. However, resultant of removing the Horizontal Elm, more options may be available for the reuse of the property and building including the area located at the centre.

Ceres seek the following decision:

- a. **Remove** the Horizontal Elm (*Ulmus glabra Horizontalis*) tree located on 25 Peterborough Street (Significant Tree #274) from Appendix 9.4.7.1 Schedules of significant trees (Christchurch City and Banks Peninsula).
- b. **Remove** the Significant and other Trees overlay applied to 25 Peterborough Street and update Planning Map 32C and H10 accordingly.

PC14

Chapter 15 Commercial

Ceres **oppose** changes to the proposed Chapter 15 Commercial (as notified on 17 March 2023) for the following reasons.

Point 4. There is ambiguity regarding the height standards / overlay applicable to the 25 Peterborough Street and 87-93 Victoria Street which, in turn, causes confusion and poor application of the provisions.

Point 5. The height standards / overlay applicable to the 25 Peterborough Street and 87-93 Victoria Street, in conjunction with Standards 15.11.2.11, 15.11.2.12, 15.11.2.14, 15.11.2.15, and 15.11.2.16, are contrary to Policy 3 of the National Policy Statement on Urban Development 2020 ("NPS-UD").

Point 6. Policy 15.2.4.1.a.iii is contrary to Policy 3 of the NPS-UD

Point 4

With regards to building height standards applicable to 25 Peterborough Street, the following is noted.

- Pursuant to Standard 15.11.2.11.a.i of PC14, the maximum height of any building on the property is 90m, and the maximum height of the building base is 28m.
- Pursuant to Standard 15.11.2.11.a.vi of PC14, the maximum height of all buildings in the Central City Heritage Qualifying Matter and Precinct is 28m.
- Pursuant to Standard 15.11.2.12 of PC14, the maximum height of the road wall of any building on the property shall be ... for sites located on a street intersection, a maximum height of 28m for a maximum distance of 30m from the street corner.
 - 25 Peterborough Street comprises several unit titles with a Stratum in Freehold estate. In the case
 of strata titles, PC14 defines site as meaning the underlying certificate of title of the entire land
 immediately prior to subdivision. Considering this, 25 Peterborough Street is entirely located on a
 street intersection.
- As previously mentioned, 25 Peterborough Street is subject to the Central City Building Height 32m Overlay pursuant to PC14.

With regards to building height standards applicable to 87-93 Victoria Street, the following is noted.

- Pursuant to Standard 15.11.2.11.a.v of PC14, the maximum height of all buildings on the property (as its located within the Victoria Street Height Precinct) is 45m, and the maximum height of the building based is 28m.
- Pursuant to Standard 15.11.2.11.a.vi of PC14, the maximum height of all buildings in the Central City Heritage Qualifying Matter and Precinct is 28m.
- As previously mentioned, 87-93 Victoria Street is subject to the Central City Building Height 45m Overlay pursuant to PC14.

Notably, there is no link between Standards 15.11.2.11 and 15.11.2.12 of PC14 and the Central City Maximum Building Height Planning Map including its overlays.

Considering the above, the various height standards / overlays applicable to 25 Peterborough Street and 87-93 Victoria Street create confusion and will result in poor application due to the ambiguity.

Additionally, the various height standards / overlays are contrary to Policy 3 of the NPS-UD for the reasons detailed below. Specifically, the heights standards / overlays applicable to 25 Peterborough Street and 87-93 Victoria Street as notified do not maximise the benefits of intensification.

An appropriate maximum height of any building on 25 Peterborough Street and 87-93 Victoria Street would be 90m to enable an economical redevelopment of both properties and restoration of the heritage buildings therein.

Ceres seek the following decision:

- a. **Remove** the Central City Heritage Qualifying Matter and Precinct applied to 25 Peterborough Street and 87-93 Victoria Street and update the planning maps accordingly.
- b. **Remove** the Central City Building Height 32m Overlay from 25 Peterborough Street and update the Central City Maximum Building Height Planning Map accordingly.
- c. **Remove** the Central City Building Height 45m Overlay from 87-93 Victoria Street and update the Central City Maximum Building Height Planning Map accordingly.
- d. **Remove** 87-93 Victoria Street from the Victoria Street Height Precinct and update the planning maps accordingly.
- e. **Delete** Standard 15.11.2.12.
- f. **Add** an exemption to Standard 15.11.2.11 which states that clauses ii to vi of Standard 15.11.2.11.a do not apply to any site containing a significant heritage item.
- g. **Add** an exemption to Standard 15.11.2.12 which states that clause a of Standard 15.11.2.12 does not apply to any site containing a significant heritage item.
- h. **Add** an exemption to Standard 15.11.2.14 which states that clause a of Standard 15.11.2.14 does not apply to any site containing a significant heritage item.
- i. Add an exemption to Standard 15.11.2.15 which states that clause a of Standard 15.11.2.15 does not apply to any site containing a significant heritage item.
- j. **Add** an exemption to Standard 15.11.2.16 which states that clause a of Standard 15.11.2.16 does not apply to any site containing a significant heritage item.

Point 5

Policy 3 of the NPS-UD states "In relation to tier 1 urban environments, regional policy statements and district plans enable:

a) in city centre zones, building heights and density of urban form to realise as much development capacity as possible, to maximise benefits of intensification; ..."

The various height standards of Standards 15.11.2.11 and 15.11.2.12 and building height overlays applicable to 25 Peterborough Street and 87-93 Victoria Street are detailed in Point 4 above.

With regards to density of urban form, the following standards of PC14 are relevant to both properties.

- Standard 15.11.2.1 (Building setback and continuity)
- Standard 15.11.2.3 (Sunlight and outlook for the street)
- Standard 15.11.2.9 (Sunlight and outlook at boundary with a residential zone)
- Standard 15.11.2.10 (Minimum setback from the boundary with a residential zone)
- Standard 15.11.2.14 (Building tower setbacks)
- Standard 15.11.2.15 (Maximum building tower dimension and building tower coverage)
- Standard 15.11.2.16 (Minimum building tower separation)

The tenets of the standards bullet pointed above will not be traversed. However, when these standards are applied to 25 Peterborough Street and 87-93 Victoria Street, in conjunction with the height standards and overlays, any redevelopment of these properties and buildings therein will be restricted and impeded in both its height and density options. Ceres engaged several experienced architectural firms to develop concept plans for 25 Peterborough Street to deliver a multi-storey apartment or hotel development. All proposed designs are considered to deliver high quality urban design outcomes, yet none of them would

comply with the 'podium and tower' typology which PC14 appears to seek and consider as being the only acceptable design solution.

Applying the height standards / overlays, in conjunction with the standards bullet pointed above to the redevelopment of small or unusually shaped land parcels (which are common through the city centre) will be extremely challenging.

Resultant of applying these standards / overlays, in most costs, the redevelopment of any city centre zone site (including 25 Peterborough Street and 87-93 Victoria Street) will result in a financial return significantly less than that achievable through the Operative Plan. Consequentially, it may be uneconomical to develop / redevelop many city centre sites including those occupied by significantly damaged buildings (which would be left in a state of disrepair / derelict) or those undeveloped and vacant.

Consequentially, Standards 15.11.2.1, 15.11.2.3, 15.11.2.9 to 15.11.2.12, and 15.11.2.14 to 15.11.2.16 and the building height overlays of PC14 do not maximise the benefits of intensification and, therefore, are contrary to Policy 3 of the NPS-UD.

Ceres seek the following decision:

a. **Delete** Standards 15.11.2.11, 15.11.2.12, 15.11.2.14, 15.11.2.15, and 15.11.2.16

Point 6

Rule 15.11.1.1.c limits the permitted activities undertaken at 25 Peterborough Street to those detailed within Rules 15.11.1.1 (P13), (P14), and (P17) pursuant to PC14.

Rule 15.11.1.1 (P13) relates to residential activity with various activity specific standards.

Rule 15.11.1.1 (P14) relates to visitor accommodation with various activity specific standards.

Rule 15.11.1.1 (P17) states "the following activities in the Former Christchurch Teachers College building at 25 Peterborough Street:

- i. Retail activity
- ii. Commercial services
- iii. Entertainment activity
- iv. Gymnasium
- v. Education activity
- vi. Health care facility
- vii. Office
- viii. Art studios and workshops
- ix. Preschool"

Rule 15.11.1.1 (P17) of PC14 is a carryover from the Operative Plan, specifically Rule 15.10.1.1 (P17).

Rule 15.11.1.1 (P17) significantly impacts the redevelopment of 25 Peterborough Street and the building therein by limiting the land uses and associated scale that are permitted to operate from this property. As previously mentioned, repairing, reconstructing, and / or redeveloping 25 Peterborough Street and its significantly damaged heritage building will be at a great cost. This cost will be weighed against the long-term economic benefit of the work and, therefore, the use of 25 Peterborough Street needs to be maximised. This can be achieved by enabling appropriate land uses to operate from 25 Peterborough Street as permitted activities, without limiting their scale. Rules 15.11.1.1 (P1) to (P15) detail land uses anticipated within the City Centre Zone and Ceres consider these same uses and associated scales to be appropriate to operate from 25 Peterborough Street.

Rule 15.10.1.1 (P17) of the Operative Plan was largely proposed by Ceres in their submission on the Christchurch District Plan 2015. However, since the 2015 submission, Ceres have a greater awareness of the significant scope of works and associated cost to repair, restore, or reconstruct 25 Peterborough Street. To balance those costs, Ceres need to be able to maximise the built form and land use opportunities available for 25 Peterborough Street. The Section 32 Evaluation Report for the Commercial Sub-Chapters and supporting documentation does not provide any reasoning for the retention of Rule 15.11.1.1 (P17) of PC14. Therefore, it does not seem sensible to restrict the land uses or control land uses that operate from 25 Peterborough Street any differently to the wider City Centre Zone. Hence, Rule 15.11.1.1 (P17) of PC14 should be deleted as it does not foster the restoration / redevelopment of 25 Peterborough from an economical / financial perspective.

Ceres seek the following decision:

- a. Delete Rule 15.11.1.1.c
- b. **Delete** Rule 15.11.1.1 (P17)
- c. Retain activity specific standard b of Rules 15.11.1.1 (P13) and (P14).

Point 7

Policy 15.2.4.1 states:

- a. Provide for development of a significant scale and form massing that reinforces the City's distinctive sense of place and a legible urban form by: ...
 - iii. limiting building height along Victoria Street where taller buildings are inappropriate due to the potential impact on legibility of the city centre form and dominance impacts on adjoining residential neighbourhoods.

For the reasons detailed within point 5 above, tenet iii of Policy 15.2.4.1.a is contrary to Policy 3 of the NPS-UD as limiting building heights along Victoria Street does not maximise the benefit of intensification.

The scale and massing of development within the City Centre Zone is controlled through the standards. The various relevant standards ensure that building heights are limited to that appropriate for the wider city centre form and its legibility, as well as adjoining residential neighbourhoods. Therefore, tenet iii of Policy 15.2.4.1.a is unnecessary.

Ceres seek the following decision:

a. Delete Rule 15.2.4.1.a.iii.

Summary

Ceres generally support PC13 and PC14 on the basis that the modifications detailed above are adopted.

Yours faithfully

PLANZ CONSULTANTS LTD

Terri Winder

Consultant Planner

Phone: 021 225 9323

Email: terri@planzconsultants.co.nz





Our Reference: J16644

Mark Stevenson Christchurch City Council c/o Engagement Team

Email: engagement@ccc.govt.nz

Dear Mark,

SUBMISSION ON A NOTIFIED PROPOSAL FOR A POLICY STATEMENT OR PLAN, CHANGE OR VARIATION CLAUSE 6 OF SCHEDULE 1 AND VIA INTENSIFICATION PLANNING INSTRUMENT (IPI) IN ACCORDANCE WITH SECTION 80F(1)(a), RESOURCE MANAGEMENT ACT 1991

SUBMISSION ON HERITAGE PLAN CHANGE (PC13) AND HOUSING AND BUSINESS CHOICE PLAN CHANGE (PC14)

Purpose of Submission

This letter is a submission on the Heritage Plan Change ("PC13") and Housing and Business Choice Plan Change ("PC14") proposed by the Christchurch City Council ("Council") prepared by Planz Consultants Limited ("Planz") on behalf of Ceres New Zealand, LLC ("Ceres").

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

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

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

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

Submitters details

Submitter Ceres New Zealand, LLC

Contact Name Swaroop Gowda

Address for Service Ceres New Zealand, LLC

C/- Planz Consultants Limited

PO Box 1845

Christchurch 8140

Attn: Terri Winder

M: 021 225 9323

E: terri@planzconsultants.co.nz

Submission

This submission has been prepared by following the Council's notification of PC13 and PC14 in relation to 25 Peterborough Street, Central City, Christchurch and 87-93 Victoria Street, Central City, Christchurch.

The location of 25 Peterborough Street is depicted in Figure 1. Under PC13 and PC14, 25 Peterborough Street is located within the City Centre Zone (Figure 2) and subject to the following overlays.

- Heritage Setting Setting #281
- Heritage Item Item #440 Highly Significant
- Central City Building Height 32m Overlay
- Significant and other Trees Significant Tree #274.

The location of 87-93 Victoria Street is depicted in Figure 1. Under PC13 and PC14, 87-93 Victoria Street is located within the City Centre Zone (Figure 2) and subject to the following overlays.

- Cathedral Square and Victoria Street Precinct
- Victoria Street Height
- Heritage Setting Setting #296
- Heritage Item Item #529 Highly Significant
- Central City Building Height 45m Overlay



Figure 1 Location of 25 Peterborough Street within orange boundaries and 87-93 Victoria Street within red boundaries (Canterbury Maps)

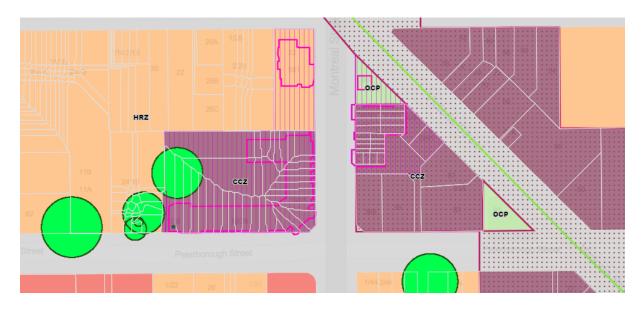


Figure 2 PC13 and PC14 Zoning of 25 Peterborough Street and 87-93 Victoria Street (PC13 and PC14 GIS)

PC13

Chapter 9.3 Historic Heritage

Ceres **oppose** changes to the proposed Chapter 9.3 Historic Heritage (as notified on 17 March 2023) for the following reasons.

Point 1. The proposed policies, rules, matters of discretion, and schedules do not reflect significantly damaged heritage buildings which are uneconomical to repair, restore, and/or reconstruct.

Point 2. Resultant of deleting a rule and matters of discretion relating to buildings which sustained damage in the Canterbury earthquakes of 2010 and 2011, it is unclear how the several significantly damaged heritage buildings in Christchurch which remain in a state of disrepair will be managed from a planning perspective.

Point 3. The retention of Significant Tree #274 impedes the redevelopment of 25 Peterborough Street and, in turn, the use / reuse of the property and building therein.

Point 1

There are several heritage buildings within the city which remain significantly damaged, derelict, and vacant (e.g., 25 Peterborough Street and 91-93 Victoria Street), albeit the city is approximately 12 years post the Canterbury earthquakes.

Policy 9.3.2.2.3 (as notified) seeks for heritage items to be managed in a way that provides for the ongoing use / adaptive reuse of heritage buildings in a manner that is sensitive to their heritage values while recognising the need for works to be undertaken to accommodate their long-term retention and use, and the associated engineering and financial factors. Additionally, this policy seeks to recognise the need for a flexible approach to heritage management, with particular regard to enabling repairs, restoration, and reconstruction, in a manner which is sensitive to the heritage values of the scheduled historic heritage.

However, repairing a significantly damaged heritage building will involve a large volume of reconstruction and restoration work meaning that the resultant building is more likely than not to be a replica, rather than the original heritage fabric. Considering this, short- and long-term financial factors (i.e., repair / reconstruction costs, rental yield, etc.) greatly influence the ongoing use / adaptive reuse of a significantly damaged heritage building. For example, if the cost to repair / reconstruct a significantly damaged heritage building outweighs the long-term financial return then it would be uneconomical to pursue redevelopment options. Consequentially, damaged heritage buildings may be left in a damaged and derelict state or demolished entirely.

Considering the above, this policy (as notified) does not fully recognise the great impact financial factors contribute to the commercial decision of repairing, restoring, and reconstructing a significantly damaged heritage building to foster its use / reuse. Notably, sensitivity towards financial factors seems to understate its influence.

Additionally, Rule 9.3.4.1.5 (NC1) (as notified) does not fully recognise / reflect the need to demolish a significantly damaged heritage building that would be uneconomical to repair, restore, or reconstruct. The Non-Complying Activity status seems excessive / onerous given the nature of the damage sustained by a highly significant heritage item, and cost to repair / reconstruct.

Considering the above, Ceres seek the following decisions:

- a. Create a schedule identifying significantly damaged heritage items which face significant challenges to their ongoing restoration and economic reuse. Given that 12 years have elapsed since the earthquakes, these buildings are well known and able to be readily distinguished from buildings that are habitable and occupied. The list is narrow, is likely to extend to no more than a dozen or so buildings, and could include the following: Victoria Mansions, Peterborough Centre, Harley Chambers (Cambridge Tce), Englefield House (Fitzgerald Ave), Empire Hotel (Norwich Quay), Daresbury (Daresbury Lane), and the Dux/ Student Union building at the Arts Centre.
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- e. Add a Matter of Discretion provision to Rule 9.3.6 relating to the provision of a heritage restoration assessment or a heritage demolition assessment (the latter being applicable if the heritage item is to be demolished); engineering and Quantity Surveying evidence; photographic records; and a deconstruction salvage plan.

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There are several heritage buildings within Christchurch which remain significantly damaged and vacant because of the various Canterbury earthquakes. The Operative Christchurch District Plan ("Operative Plan") specifically provided Rules and Matters of Discretion relating to the upgrade, replacement, reconstruction, restoration, alteration, and relocation of a heritage item.

However, resultant of PC13, these Rules and Matters of Discretion are proposed to be deleted, or significantly altered so that the resultant effect is entirely different to that of the Operative Plan. This approach seems premature while there continue to be several significantly damaged heritage buildings within Christchurch.

Ceres seek the following decision:

a. **Delete** the PC13 proposed changes to Rule 9.3.4.1.1 (P9) and proposed deletion of P11 and P12 and Matter of Discretion 9.3.6.1.

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As a consequence of earthquake damage, the heritage building at 25 Peterborough Street may require significant reconstruction (potentially including demolition works) to reuse the building and property. The Horizontal Elm established on the site, which is identified as being significant, is located behind the

existing building and its visibility from adjacent properties and public spaces is largely blocked by built form. The precise location of the Horizontal Elm will highly likely restrict / impede the reconstruction / redevelopment of the building and property by limiting layout and design options. However, resultant of removing the Horizontal Elm, more options may be available for the reuse of the property and building including the area located at the centre.

Ceres seek the following decision:

- a. **Remove** the Horizontal Elm (*Ulmus glabra Horizontalis*) tree located on 25 Peterborough Street (Significant Tree #274) from Appendix 9.4.7.1 Schedules of significant trees (Christchurch City and Banks Peninsula).
- b. **Remove** the Significant and other Trees overlay applied to 25 Peterborough Street and update Planning Map 32C and H10 accordingly.

PC14

Chapter 15 Commercial

Ceres **oppose** changes to the proposed Chapter 15 Commercial (as notified on 17 March 2023) for the following reasons.

Point 4. There is ambiguity regarding the height standards / overlay applicable to the 25 Peterborough Street and 87-93 Victoria Street which, in turn, causes confusion and poor application of the provisions.

Point 5. The height standards / overlay applicable to the 25 Peterborough Street and 87-93 Victoria Street, in conjunction with Standards 15.11.2.11, 15.11.2.12, 15.11.2.14, 15.11.2.15, and 15.11.2.16, are contrary to Policy 3 of the National Policy Statement on Urban Development 2020 ("NPS-UD").

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Point 4

With regards to building height standards applicable to 25 Peterborough Street, the following is noted.

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 property shall be ... for sites located on a street intersection, a maximum height of 28m for a maximum
 distance of 30m from the street corner.
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 of strata titles, PC14 defines site as meaning the underlying certificate of title of the entire land
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 street intersection.
- As previously mentioned, 25 Peterborough Street is subject to the Central City Building Height 32m Overlay pursuant to PC14.

With regards to building height standards applicable to 87-93 Victoria Street, the following is noted.

- Pursuant to Standard 15.11.2.11.a.v of PC14, the maximum height of all buildings on the property (as its located within the Victoria Street Height Precinct) is 45m, and the maximum height of the building based is 28m.
- Pursuant to Standard 15.11.2.11.a.vi of PC14, the maximum height of all buildings in the Central City Heritage Qualifying Matter and Precinct is 28m.
- As previously mentioned, 87-93 Victoria Street is subject to the Central City Building Height 45m Overlay pursuant to PC14.

Notably, there is no link between Standards 15.11.2.11 and 15.11.2.12 of PC14 and the Central City Maximum Building Height Planning Map including its overlays.

Considering the above, the various height standards / overlays applicable to 25 Peterborough Street and 87-93 Victoria Street create confusion and will result in poor application due to the ambiguity.

Additionally, the various height standards / overlays are contrary to Policy 3 of the NPS-UD for the reasons detailed below. Specifically, the heights standards / overlays applicable to 25 Peterborough Street and 87-93 Victoria Street as notified do not maximise the benefits of intensification.

An appropriate maximum height of any building on 25 Peterborough Street and 87-93 Victoria Street would be 90m to enable an economical redevelopment of both properties and restoration of the heritage buildings therein.

Ceres seek the following decision:

- a. **Remove** the Central City Heritage Qualifying Matter and Precinct applied to 25 Peterborough Street and 87-93 Victoria Street and update the planning maps accordingly.
- b. **Remove** the Central City Building Height 32m Overlay from 25 Peterborough Street and update the Central City Maximum Building Height Planning Map accordingly.
- c. **Remove** the Central City Building Height 45m Overlay from 87-93 Victoria Street and update the Central City Maximum Building Height Planning Map accordingly.
- d. **Remove** 87-93 Victoria Street from the Victoria Street Height Precinct and update the planning maps accordingly.
- e. **Delete** Standard 15.11.2.12.
- f. **Add** an exemption to Standard 15.11.2.11 which states that clauses ii to vi of Standard 15.11.2.11.a do not apply to any site containing a significant heritage item.
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a) in city centre zones, building heights and density of urban form to realise as much development capacity as possible, to maximise benefits of intensification; ..."

The various height standards of Standards 15.11.2.11 and 15.11.2.12 and building height overlays applicable to 25 Peterborough Street and 87-93 Victoria Street are detailed in Point 4 above.

With regards to density of urban form, the following standards of PC14 are relevant to both properties.

- Standard 15.11.2.1 (Building setback and continuity)
- Standard 15.11.2.3 (Sunlight and outlook for the street)
- Standard 15.11.2.9 (Sunlight and outlook at boundary with a residential zone)
- Standard 15.11.2.10 (Minimum setback from the boundary with a residential zone)
- Standard 15.11.2.14 (Building tower setbacks)
- Standard 15.11.2.15 (Maximum building tower dimension and building tower coverage)
- Standard 15.11.2.16 (Minimum building tower separation)

The tenets of the standards bullet pointed above will not be traversed. However, when these standards are applied to 25 Peterborough Street and 87-93 Victoria Street, in conjunction with the height standards and overlays, any redevelopment of these properties and buildings therein will be restricted and impeded in both its height and density options. Ceres engaged several experienced architectural firms to develop concept plans for 25 Peterborough Street to deliver a multi-storey apartment or hotel development. All proposed designs are considered to deliver high quality urban design outcomes, yet none of them would

comply with the 'podium and tower' typology which PC14 appears to seek and consider as being the only acceptable design solution.

Applying the height standards / overlays, in conjunction with the standards bullet pointed above to the redevelopment of small or unusually shaped land parcels (which are common through the city centre) will be extremely challenging.

Resultant of applying these standards / overlays, in most costs, the redevelopment of any city centre zone site (including 25 Peterborough Street and 87-93 Victoria Street) will result in a financial return significantly less than that achievable through the Operative Plan. Consequentially, it may be uneconomical to develop / redevelop many city centre sites including those occupied by significantly damaged buildings (which would be left in a state of disrepair / derelict) or those undeveloped and vacant.

Consequentially, Standards 15.11.2.1, 15.11.2.3, 15.11.2.9 to 15.11.2.12, and 15.11.2.14 to 15.11.2.16 and the building height overlays of PC14 do not maximise the benefits of intensification and, therefore, are contrary to Policy 3 of the NPS-UD.

Ceres seek the following decision:

a. **Delete** Standards 15.11.2.11, 15.11.2.12, 15.11.2.14, 15.11.2.15, and 15.11.2.16

Point 6

Rule 15.11.1.1.c limits the permitted activities undertaken at 25 Peterborough Street to those detailed within Rules 15.11.1.1 (P13), (P14), and (P17) pursuant to PC14.

Rule 15.11.1.1 (P13) relates to residential activity with various activity specific standards.

Rule 15.11.1.1 (P14) relates to visitor accommodation with various activity specific standards.

Rule 15.11.1.1 (P17) states "the following activities in the Former Christchurch Teachers College building at 25 Peterborough Street:

- i. Retail activity
- ii. Commercial services
- iii. Entertainment activity
- iv. Gymnasium
- v. Education activity
- vi. Health care facility
- vii. Office
- viii. Art studios and workshops
- ix. Preschool"

Rule 15.11.1.1 (P17) of PC14 is a carryover from the Operative Plan, specifically Rule 15.10.1.1 (P17).

Rule 15.11.1.1 (P17) significantly impacts the redevelopment of 25 Peterborough Street and the building therein by limiting the land uses and associated scale that are permitted to operate from this property. As previously mentioned, repairing, reconstructing, and / or redeveloping 25 Peterborough Street and its significantly damaged heritage building will be at a great cost. This cost will be weighed against the long-term economic benefit of the work and, therefore, the use of 25 Peterborough Street needs to be maximised. This can be achieved by enabling appropriate land uses to operate from 25 Peterborough Street as permitted activities, without limiting their scale. Rules 15.11.1.1 (P1) to (P15) detail land uses anticipated within the City Centre Zone and Ceres consider these same uses and associated scales to be appropriate to operate from 25 Peterborough Street.

Rule 15.10.1.1 (P17) of the Operative Plan was largely proposed by Ceres in their submission on the Christchurch District Plan 2015. However, since the 2015 submission, Ceres have a greater awareness of the significant scope of works and associated cost to repair, restore, or reconstruct 25 Peterborough Street. To balance those costs, Ceres need to be able to maximise the built form and land use opportunities available for 25 Peterborough Street. The Section 32 Evaluation Report for the Commercial Sub-Chapters and supporting documentation does not provide any reasoning for the retention of Rule 15.11.1.1 (P17) of PC14. Therefore, it does not seem sensible to restrict the land uses or control land uses that operate from 25 Peterborough Street any differently to the wider City Centre Zone. Hence, Rule 15.11.1.1 (P17) of PC14 should be deleted as it does not foster the restoration / redevelopment of 25 Peterborough from an economical / financial perspective.

Ceres seek the following decision:

- a. Delete Rule 15.11.1.1.c
- b. **Delete** Rule 15.11.1.1 (P17)
- c. Retain activity specific standard b of Rules 15.11.1.1 (P13) and (P14).

Point 7

Policy 15.2.4.1 states:

- a. Provide for development of a significant scale and form massing that reinforces the City's distinctive sense of place and a legible urban form by: ...
 - iii. limiting building height along Victoria Street where taller buildings are inappropriate due to the potential impact on legibility of the city centre form and dominance impacts on adjoining residential neighbourhoods.

For the reasons detailed within point 5 above, tenet iii of Policy 15.2.4.1.a is contrary to Policy 3 of the NPS-UD as limiting building heights along Victoria Street does not maximise the benefit of intensification.

The scale and massing of development within the City Centre Zone is controlled through the standards. The various relevant standards ensure that building heights are limited to that appropriate for the wider city centre form and its legibility, as well as adjoining residential neighbourhoods. Therefore, tenet iii of Policy 15.2.4.1.a is unnecessary.

Ceres seek the following decision:

a. Delete Rule 15.2.4.1.a.iii.

Summary

Ceres generally support PC13 and PC14 on the basis that the modifications detailed above are adopted.

Yours faithfully

PLANZ CONSULTANTS LTD

Terri Winder

Consultant Planner

Phone: 021 225 9323

Email: terri@planzconsultants.co.nz

Our proposed Housing and Business Choice Plan Change (14)



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Submission Date: 09/05/2023

First name: Defyd Last name: Williams

Organisation: Papanui Heritage Group

Prefered method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Oppose

I seek the following decision from the Council

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

My submission is that:

See the detailed submission attached.

This submission, from the Papanui Heritage Group, is about the Proposed Housing and Business Choice Plan Change (PC14). More specifically it is about the extent of the High Density Residential Zone in Papanui as shown on Planning Map 24A. Our submission is that we are **opposed** to the High Density Residential Zone (HRZ) extending into the residential streets of Papanui. We would like the extent of this zone to be greatly reduced to those areas marked TC2, so that it does not intrude into the quiet-tree-lined streets which are such a feature of Papanui.

Attached Documents

Name
Defyd Williams-PHG submssion PC 14

Proposed Housing and Business Choice Plan Change (PC14) Submission from the Papanui Heritage Group, May 2023

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

Defyd - Click on 'planning maps' which is right down the bottom of the drop-down menu.

My submission is:

This submission, from the Papanui Heritage Group, is about the Proposed Housing and Business Choice Plan Change (PC14). More specifically it is about the extent of the High Density Residential Zone in Papanui as shown on Planning Map 24A. Our submission is that we are **opposed** to the High Density Residential Zone (HRZ) extending into the residential streets of Papanui. We would like the extent of this zone to be greatly reduced to those areas marked TC2, so that it does not intrude into the quiet-tree-lined streets which are such a feature of Papanui.

The reasons for our submission are:

Papanui is a popular suburb whose character comes from a range of building styles dating from the 1890s to the present day, and the presence of many street-side trees. The fifteen Memorial Avenues planted following World War II as memorials to those Christchurch citizens who died in the war, are a special feature of Papanui. Some streets adjoining the memorial avenues have also been planted and now make for a most attractive streetscape: Rayburn Avenue being a prime example.

We have a particular concern about the inclusion of the total length of four of Papanui's Memorial Avenues (St James Avenue, Dormer, Perry and Gambia Streets) in the High Density Residential Zone.

In addition part of two memorial avenues, Halton Street, and Tomes Road, and one side of Windermere Road are in the High Density Residential Zone.

To have housing blocks of up to 14 metres (without resource consent) and 14 - 32 metres (with resource consent) looming over these streets would be visually jarring and would cause a huge loss of passive enjoyment for inhabitants of the suburb.

Four to ten-storey housing blocks on any of the proposed HRZ streets in Papanui would be hugely damaging to the health and well-being of residents who stand to lose sunlight and privacy, to be heavily shaded and to suffer financial loss on what for many elderly people is their only significant asset.

We are also opposed to the HRZ zone extending along Papanui Road. Currently side streets such as Tomes Road, Halton Perry, Dormer and Paparoa Street provide attractive view shafts for people travelling along Papanui Road. But with HRZ zones on both side of the road there will be an inevitable loss of trees and street facing gardens. Instead, these will eventually be

replaced by dreary multi-level tower blocks, which will do little to encourage residents to walk and explore their suburb.

.....

Papanui Road was the original link between Christchurch and its oldest suburb. In the late nineteenth century and early twentieth century it became notable for the quality of its residential housing and the presence of churches and schools. The city's most popular tram service also ran along Papanui Road. Although much of this has changed the streetscape still rewards walkers and cyclists, bus and car passengers with some of its historic character. Papanui Road should be protected from the development which would blight the whole area.

Most significant of all is the inclusion of St James Avenue in the HRZ zone, where original memorial scarlet oak trees line the Harewood Road end of the street. High-rise apartment blocks would destroy the character of this most historic part of Papanui. Previous attempts to remove or replace the mature oak trees in St James Avenue have been resisted by local residents on at least three occasions, for example in 2010. Most recently in 2016 the local community successfully argued (to a Government-appointed independent hearings panel) against a proposal to rezone part of Papanui, which would have led to housing intensification.

The first building in this area was the St Pauls Anglican church completed in 1853 replaced in 1878 by a timber Gothic Revival church designed by Benjamin Mountfort, which still stands today. The associated glebe was developed as St James' Park in 1923 and features a children's playground and a croquet ground complemented by mature English trees planted in the mid-1920s. St James Avenue, developed in the 1890s, effectively frames the park and displays a range of housing styles from the late nineteenth century through to buildings that post-date the Canterbury earthquakes. The cemetery attached to St Pauls' Church completes an oasis of calm and the significance of the church and cemetery have been recognised with Category 2 Heritage New Zealand classifications.

......

The Papanui Heritage Group is well qualified to comment on the Papanui area, having been collecting information, documenting and photographing the district since the group's founding in 2001. The group has published a series of pamphlets, and has placed many of its publications and research in the Papanui Library for the public to use. It provided monthly articles to the Nor'West News for many years, and published a book about the history of the Papanui area, *Timber Town to City Suburb*, by Murray Williams. The PHG has contributed to the financing of the re-establishment of Papanui Bush and the historical interpretation board at the entrance.

Medium Density Residential Zone (MRZ):

The PHG understands that the Medium Density Residential Zone for most of residential Christchurch has been legally imposed by the Government.

Nonetheless the Papanui Heritage Group wishes to register its protest against the imposition of such a zone.

Most of Papanui's housing is single storey and we foresee inequitable situations developing where those who are unlucky enough to have three-storey units built next to them will suffer a loss in property value. Pensioners whose only significant investment is their single storey bungalow, could find their future comfort and prosperity undermined. In addition, loss of sun, loss of privacy and colder houses will all lead to a loss in quality of life.

We don't agree that such intensification is necessary in suburban Christchurch. Instead, our contention is that the gradual building of infill housing, or blocks of single or double storey flats on empty sections, as is happening now, will meet Papanui's future housing needs.

I seek the following decision from the Council:

We ask that St James Avenue, Windermere Road, Gambia Street, Dormer Street, Perry Street, Halton Street, Paparoa Street, Rayburn Avenue and Tomes Road, all be removed from the High Density Residential Zone.

I am seeking that Council make changes to a specific site or sites:

Yes

Please provide the address or area

St James Avenue, Windermere Road, Gambia Street, Dormer Street, Perry Street, Halton Street, Paparoa Street, Tomes Road, Rayburn Avenue.

Do you wish to speak at the hearing in support of your submission?

Yes

If others make a similar submission would you consider presenting a joint case at the hearing?

No

Our proposed Housing and Business Choice Plan Change (14)



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Submission Date: 09/05/2023

First name: Dylan Last name: Lange

Organisation: Papanui Heritage Group

On behalf of: Papanui Heritage Group

Prefered method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Oppose

I seek the following decision from the Council

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

My submission is that:

See detailed submission in the attachment.

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Attached Documents

	Name	
Defyd Williams-PHG submssion PC 14		э. Т

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My submission is:

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The reasons for our submission are:

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We have a particular concern about the inclusion of the total length of four of Papanui's Memorial Avenues (St James Avenue, Dormer, Perry and Gambia Streets) in the High Density Residential Zone.

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The first building in this area was the St Pauls Anglican church completed in 1853 replaced in 1878 by a timber Gothic Revival church designed by Benjamin Mountfort, which still stands today. The associated glebe was developed as St James' Park in 1923 and features a children's playground and a croquet ground complemented by mature English trees planted in the mid-1920s. St James Avenue, developed in the 1890s, effectively frames the park and displays a range of housing styles from the late nineteenth century through to buildings that post-date the Canterbury earthquakes. The cemetery attached to St Pauls' Church completes an oasis of calm and the significance of the church and cemetery have been recognised with Category 2 Heritage New Zealand classifications.

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Yes

Please provide the address or area

St James Avenue, Windermere Road, Gambia Street, Dormer Street, Perry Street, Halton Street, Paparoa Street, Tomes Road, Rayburn Avenue.

Do you wish to speak at the hearing in support of your submission?

Yes

If others make a similar submission would you consider presenting a joint case at the hearing?

No

Our proposed Housing and Business Choice Plan Change (14)



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Submission Date: 02/05/2023

First name: Susan Last name: Peake

Prefered method of contact Email

Consultation Document Submissions

Provision: Chapter 8 Subdivision, Development and Earthworks

Oppose

I seek the following decision from the Council

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

I wish to see the proposed zoning for the eight Papanui Living Streets change from being classified as residential high density and revert to residential medium density housing.

My submission is that:

Given the non existence of a local Residents' Group in the Papanui Living Streets neighbourhood(the Papanui East Residents' Association ceased to function around 2010) a small group of long term current residents and myself met in late 2022 to discuss various local issues including a specific focus on infill housing and the infrastructure required to cope with increased housing density. Subsequently, via email conversations, group members unanimously agreed to oppose the provision of the density zone issue change on the following ground (see attachment).

Attached	Documents

Name

Susan Peake attachment P14 Housing Density Submission

PC 14 submission: Susan Peake

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

This submission relates to the current P14 provision pertaining to the eight (8) 'Living Streets in East Papanui' (formerly known pre 2003 as the 'Papanui Cluster').

These streets include Grants Road, Gambia, Mary, Proctor, Frank, Wyndham, Loftus and Horner Streets. The proposed provisions increase the housing density level from (current) Medium Density Zone to High Density Zone.

My submission is that:

I oppose the proposed change from residential medium density housing to residential high density zoning.

Given the non existence of a local Residents' Group in the Papanui Living Streets neighbourhood (the Papanui East Residents' Association ceased to function around 2010) a small group of long term current residents and myself met in late 2022 to discuss various local issues including a specific focus on infill housing and the infrastructure required to cope with increased housing density. Subsequently, via email conversations, group members unanimously agreed to oppose the provision of the density zone issue change on the following grounds:

- When the Living Streets were developed between 2003-2008, at great financial expense to the Council, the eight streets in the unique Papanui Cluster were significantly narrowed with road calming measures which included traffic flow redirection, offset road intersections and major landscaping. The maps provided by the Christchurch City Council (Council) and included in the PC14 proposal do not accurately reflect the current design of the small 'blocks' of narrow streets in the Papanui cluster accommodating a 3 vehicle width.
- The Council's stated mission was to create...'variety of road environments support and encourage a greater range of community and street activity'. Being changed to a high density housing zone will not meet the Council's aim as multistorey buildings on limited space will not necessarily lead to a sense of connectedness and community.
- The land in the Papanui Living Streets areas is unsuitable for higher level housing (14-32 metres) due to flood prone nature of the land which has a consistently high water table and unidentified springs. A 'Black Map' showing waterways, swamps and vegetation cover in 1856 being full of 'Raupo (bullrushes) and tussocks'.
- During severe periods of rain, residents are already worried about the existing overburdened storm water and sewerage infrastructure. Residents in Mary Street have stated they have been unable to flush toilets due to the water

backing up in the toilet bowl and storm water drains overflowing due to blocked Council drains.

- Residents have reported their properties flooding: eg earlier this year number 15
 Proctor Street was initially declined consent for a new build of four two story
 apartments due to inadequate piling depth (source, site project manager, see
 attached photo).
- Homeowners have reported sewerage in their garage (Wyndham Street) and in their front garden (Grants Road).
- Number 55 Grants Road is at the lowest point of the Living Streets area and
 consistently floods during heavy rainfall. Expensive mitigating landscaping and a
 drainage pump have had a limited impact however water continues to run over
 the pavement at the lowest point (see photo).
- The amount of infill housing in the area especially in the last two decades has impacted negatively with run-off creating more water saturation. When the housing plots were originally divided the average plot was approximately 650 square metres. Number 56 Frank Street, in the middle of the small area between Gambia and Mary Streets is 615 square metres, has recently been granted consent to build six dwellings (see photo).
- New builds without a garage means owners' cars will and are already being parked on the narrow streets most of which are either 120min parking limits during business hours or being used by staff from the ever increasing commercial area of Northlands and surrounds.
- The installation of more recent traffic signals on Grassmere Street/Main North Road plus the much earlier installation of the Mary Street/Main North Road lights has meant more vehicles cutting through the residential streets making the area less safe and more dangerous for pedestrians and those on bikes. A concept underpinning the Council Living Streets is for car drivers to 'give way to people and vulnerable road users'. The area demographics include many older home owners plus those living in the retirement village at number 95 Grants Road who regularly walk in the area.
- Several home owners have expressed concern about the proposed mixed housing development planned for the flood prone Cranford Basin. In December 2022 Council announced that there would be 1400 dwellings, a significant increase from the 410 homes approved by Council in 2016.
- Concerns have been expressed about the unknown impact between the proposed (flood-prone) Cranford Basin development and the Council's proposal regarding housing density. These concerns pertain to ensuring the three waters

infrastructure is resourced and implemented in both areas as well as the impact of increased vehicle traffic.

 Finally the community infrastructure to service a growing population means ensuring capacity is available in local health, education, social, youth and recreational facilities

I seek the following decision from the Council:

I wish to see the proposed zoning for the eight Papanui Living Streets change from being classified as residential high density and revert to **residential** medium density housing.









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Our proposed Housing and Business Choice Plan Change (14)



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Submission Date: 02/05/2023

First name: Malcolm Last name: Long

Organisation:

Ōpāwaho Heathcote River Network (OHRN)

Prefered method of contact Email

Consultation Document Submissions

Provision: Chapter 5 Natural Hazards

Seek Amendment

I seek the following decision from the Council

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

See supporting document

My submission is that:

See supporting document

Attached Documents

Name

OHRN Submission to CCC Plan Change 14

Submission on the

Christchurch City Council Plan Change 14



May, 2023

Ōpāwaho Heathcote River Network Inc.

Email: info@ohrn.nz Website: www.ohrn.nz

Facebook: OpawahoHeathcoteRiver

Phone: 027 672 7497

Thank you for the opportunity to make a submission on the Christchurch City Council (CCC) Plan Change 14.

The Ōpāwaho Heathcote River Network - Who are we?

The Ōpāwaho Heathcote River Network (OHRN) is a community based catchment group that cares deeply about the health and mauri of the river; about connecting the community around the river and about advocating for the river. We facilitate and support the values, efforts and needs of our local river care organizations and communities along the river.

We have become a voice for the river and a recognised player in the community-led delivery of collaborative actions to support the work carried out by both ECan and the CCC, to improve the health of the river and to strengthen the community connection to the river.

Our Vision is:

An ecologically healthy river that people take pride in, care for and enjoy.

Our Purpose is:

We are a voice for the Opawaho Heathcote River, advocating on its behalf to:

- promote the regeneration of the health and mauri of the awa, and
- connect with and support communities within the river catchment.

Plan Change 14: Qualifying Matters

- We request that an additional Qualifying Matter is added, namely High Soil Erosion Risk area as indicated in the Land and Water Regional Plan.
 - a. Any disturbance of the soil within areas of High Soil Erosion Risk increases the amount of erosion and increases sediment entering rivers.
 - b. Intensive residential housing creates a greater percentage of impervious surfaces on building sites.
 - c. This increased area of impervious surface increases the amount of stormwater produced which in turn increases the risk of erosion of easily erodible soils.
 - d. There are no totally satisfactory means for preventing continuing erosion of such soils once they have been disturbed, especially on slopes..
 - Climate change is causing an increase in the severity of high rainfall events which will have significant impacts on High Soil Erosion Risk areas in hill suburbs.

f. Council must be able to better control the negative effects of housing intensification and to minimise the effects of any building within High Soil Erosion Risk areas.

Plan Change 14: Policy Outcomes

We would expect that the following outcomes will guide the development of the detail of changes:

- 2. Rules should seek to maximise tree canopy coverage within intensive housing including incentives to retain mature trees and/or penalties for removal of mature trees.
 - a. Canopy cover is important for controlling ground temperatures in the context of climate change
 - b. Canopy cover increases amenity values
 - c. Canopy cover takes decades, even under ideal conditions, to recover from the removal of mature trees
- Rules should seek to encourage or require community-level planning in areas of high intensification to provide public water-garden or swale-type areas to help offset the increased stormwater runoff effects of intensification and to improve recreational amenity for the residents.

Thank you for the opportunity to provide a submission on the Draft Plan Change 14.

We wish to be heard on this submission

.

Annabelle Hasselman

Chair

Ōpāwaho Heathcote River Network

Our proposed Housing and Business Choice Plan Change (14)



Submitter Details

Submission Date: 02/05/2023

First name: Trudi Last name: Bishop

Prefered method of contact Email

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:

Beckenham should be removed from the medium residential zone due to flooding risks and heritage significance. An increase in high density housing within the Beckenham loop will increase the risk of flooding due to less vegetation cover, more concrete. Water will have less places to go.andnbsp;

With an increase in housing in this area it also increases the run off from roads from increased traffic due to an increase in population and an increase in the number of houses. There is a risk to an increase sediment in the surrounding rivers and therefore aquatic life especially of native species, flora and fauna.andnbsp;

There should be no more development allowed on the Port Hills, adjacent to Bowenvale Reserve and in Banks Peninsula due to high erosion and sediment loss in these areas. The areas need to be protected for wild life, water quality and fish passage. More planting and erosion/sediment control is required here and the unique area of natural significance for the city.

My submission is that:

The proposed changes to Plan 14 are not taking into account the wellbeing of the city's residents from living in close proximity to each other. High density housing is a stressful way to live and interact with other people. Children will have reduced access to outdoor space. Noise levels and issues with noisy neighbours will cause increased stress to residents. Privacy also becomes an issue.andnbsp;

Having lived in high density terraced housing in the UK for 20years I can testify to the increased stress levels, higher noise, issues with neighbours and stress on children from a lack of sufficient outdoor space.

There are also no considerations for tree cover, existing trees to remain on properties able to be developed or of increased flood risk due to higher density housing, meaning less porous surfaces, hotter areas to live, more pressure on storm and wastewater from an increase in population.andnbsp;

This current plan allows for developers to destroy current heritage areas such as Beckenham, St Albans which were originally considered areas of significant heritage.andnbsp;

By allowing developers to overdevelop small plots of land as the proposal suggests without consent and considering neighbours it is only favouring the developer and not the community.andnbsp;

This should not be allowed to go through.andnbsp;

More strict guidelines and enforcement of earthworks etc should be brought in as part of the plan change to reduce sediment and erosion and therefore the polluting of our waterways and therefore the coast too. This would reduce cost to the council and rate payers from having to suck sediment from stormwater drains. Building inspectors need to be brought in before earthworks begins not afterward to prevent sediment going into the waterways.andnbsp;

The tree cover and planting is not enough to balance the increase in heat from both global warming and the increase in buildings in the city, more cover and planting is required especially in a city built on a swamp. It does not make sense for the council to propose planting elsewhere in the city rather than at the housing/development sites. This is not balancing the negative effects of the building work on the over-all environment or the citizens of the city.andnbsp;

All large developments should be required to include public transport, safe cycle ways and large green spaces for residents.andnbsp;

For larger commercial or high inner city residential developments, it should be mandatory (where practical) to include solar panels, rain water collection, roof gardens (for rain water collection) and charging for electric vehicles. All buildings should have sound proofing, double/triple glazing and insulation. All large commercial builds and large residential builds should be required to include water recirculation within them - meaning 'brown water' can be recirculated to be used for flushing toilets etc to minimise water usage, waster and storm water costs to rate payers.

Christchurch City Council

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details					
Submission Date: First name:	02/05/2023 Maureen	Last name:	McGavin		
Prefered method of contact Email					
Attached Documents					
		Name			
ChristchurchDistrictF	ChristchurchDistrictPlanPhotosMay23				

Photographs Supporting Submission.

Photo01-WalkingDistance.jpg

Distance walking from Paparoa St to Northlands Mall is 1.81 Kilometres.

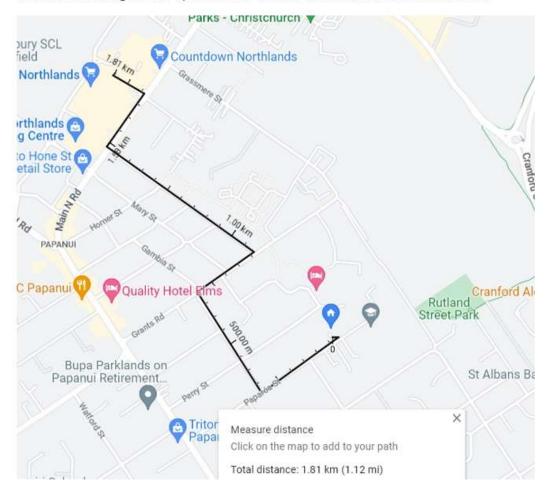


Photo02.TreeLinedStreet.jpg

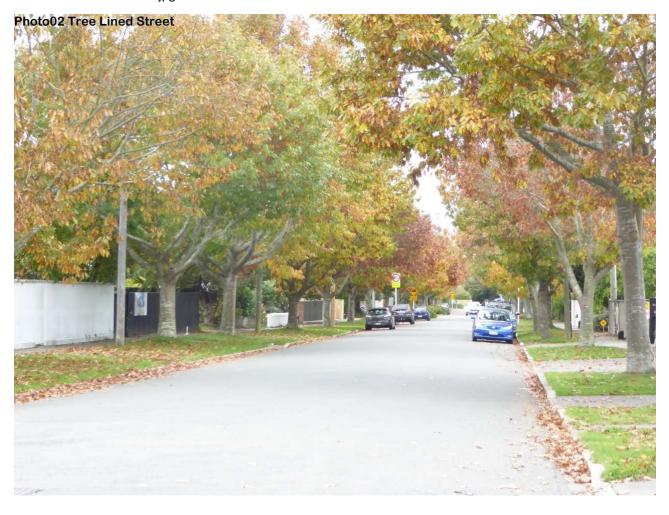


Photo03.Saturday.jpg



Photo04.DuringSchool.jpg



Photo05.MainNorthRoad-2.Jan2008.jpg

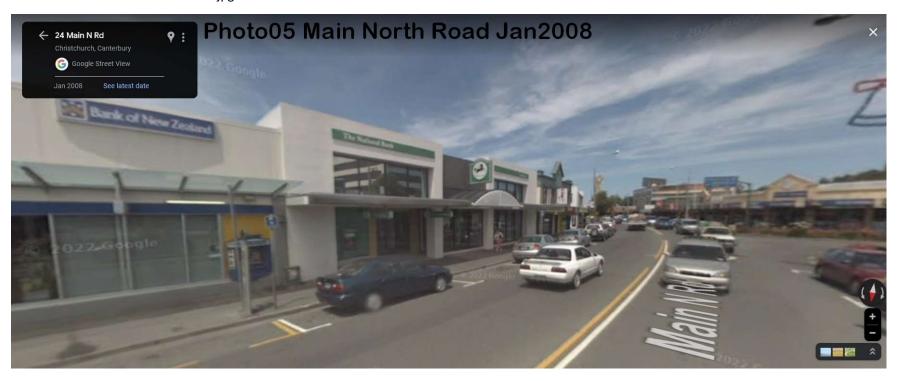


Photo06.MainNorthRoad-2.Aug2022.jpg



Photo07.MainNorthRoad-1.Jan2008.jpg



Photo08.MainNorthRoad-1.Aug2022.jpg



Photo09.LangdonsRoad.Jan2008.jpg



Photo10.LangdonsRoad.Aug2022.jpg



Photo11.PapanuiRd.Apr2023.jpg



Photo12.MainNorthRoad.Apr2023.jpg



Our submission:

Transportation - Walkability

Paparoa St is beyond reasonable walking distance from Northlands Mall. It is completely impractical to walk 1.8 km carrying a weekly supermarket shop. We already notice abandoned supermarket trolleys on streets closer to the Northlands Mall than Paparoa Street. It is also far greater than the Council's own requirement of 1.2 km walkability for the City Centre and smaller walking catchments for other centres (page 12 of Council document 'Have your say on the District Plan Changes').

See attached Photo01.WalkingDistance.jpg

Transportation - Parking

Paparoa Street is being squeezed at both ends by parking requirements, and Paparoa Street is already hazardous for traffic entering and leaving Papanui Road.

In the north, Paparoa Street School is extremely busy with parents dropping off and picking up students. Adding apartments that have no off-street parking requirement will cause significant traffic chaos (and safety risks) during the school terms.

In the south, many (unknown) people use Paparoa Street as an all-day park while they catch the bus on Papanui Road, meaning that street parking availability is very limited. Adding apartments that have no off-street parking requirement will cause significant traffic chaos and frustration.

Community - School Safety

Paparoa Street is host to Paparoa Street School - a high-quality primary school that saturates the parking in Paparoa St during school days. Adding apartments that have no off-street parking requirement (so they park on the street all day) will cause significant traffic chaos during the school terms and seriously impact on parent and child safety.

See attached photos Photo03.Saturday.jpg and Photo04.DuringSchool.jpg

Infrastructure - Water, sewage, stormwater

Paparoa Street was conceived for urban residential living, and has an infrastructure to match. This means that water reticulation and sewage, and electricity supply have been designed with capacity for residential dwellings, not high-density apartment living. Converting Paparoa St to high density living will place an unknown strain on existing infrastructure.

Demographics -Social Impact

The social impact of apartment-living people is undetermined. Apartment dwellers will likely require a lively café and entertainment environment, and a 1.8 km walk to the Northlands Mall and back is unlikely to appeal to apartment dwellers. This is likely to lead to empty apartments, a prelude to a ghetto. We have been unable to locate any City Council research on this topic.

Land Use - Geology

The land quality in Paparoa Street is likely not suitable for high density living. If new two storey houses in this area need four-metre driven piles, what would a six storey apartment block need?

Land Use - Elevation Suitability

The ground elevation at Paparoa Street is 9-10 metres above mean sea level. The impact of future weather and marine events at this elevation is unknown, but the future impact of climate change and sea level rise must be taken into consideration.

Land Use - Earthquake and Liquefaction Suitability

The Tonkin + Taylor liquefaction vulnerability map produced for Christchurch City Council defines the Papanui area (from Mays Road through to Bishopdale) as 'Medium Liquefaction Vulnerability'. The 'Liquefaction Damage Scale' Tonkin + Taylor provide has a scale of 1 to 7 (1 = less damage, 7 = more damage). Normans Road through Chapel Street has a rating of 5 out of 7 — higher damage risk from liquefaction.

Urban Design - Street Scene

Paparoa St and its surrounding streets are visually attractive tree lined streets, typical of those that support the Christchurch image of "The Garden City". They are a pleasant blend of restored 1900s villas and new houses that have been built in a manner that blends new with the old. Removing existing trees and gardens to install high-rise apartment blocks will destroy this image.

See attached photo Photo02. TreeLinedStreet.jpg

Urban Design - Papanui Designation as "Large Town Centre"

Papanui is no longer a 'Large Town Centre', and should now be designated as a 'Town Centre'. In 2008, the Main North Road in Papanui had seven (7) bank branch offices (all with ATMs), an Insurance company and a Post Office. In 2023 it has one bank, one ATM, no Insurance company and no Post Office.

See attached photos Photo05.MainNorthRoad-2.Jan2008.jpg, Photo06.MainNorthRoad-2.Aug2022.jpg,Photo11.PapanuiRd.Apr2023.jpg and Photo12.MainNorthRoad.Apr2023.jpg.

Urban Design - Focal Point of Papanui Town Centre

The current focal centre for the High Density Residential zoning is the "Old Papanui Shopping Precinct" in Papanui Road, Main North Road and the Northlands Mall. The retail shopping focus has now moved to the new shopping precinct (Northlink) on Langdons Road. As a result of this shift of retail, there are now several empty shops in Papanui Road and Main North Road.

See attached photos Photo07. MainNortRoad-1. Jan 2008. jpg and Photo08. MainNorthRoad-1. Aug 2022. jpg, Photo09. Langdons Road. Jan 2008. jpg and Photo10. Langdons Road. Aug 2022. jpg.

Urban Design - Apartment Blocks should be in Clusters

Apartment blocks have their place in a city, but they should be grouped together so that essential services can be designed and provided in bulk, and water runoff from large wet weather events can be properly predicted and managed.

Urban Design - Better Alternatives Available

There are other areas around Papanui that do not have tree-lined streets, have higher elevation and are further from the sea. An arc centred around Northlink Shopping Precinct, starting at Harewood Road and ending on Main North Road would provide a superior alternative option. The land there is farther from the sea, has a higher elevation, and has a lower liquefaction vulnerability. It is also closer to the Christchurch ring road – a major public transport corridor.

Urban Design - Papanui Heritage Designations (Plan Change 13)

Some streets around Paparoa Street are "Memorial Avenues", which have been designated as heritage streets by the 2015 Independent Hearings Panel. The Council has acknowledged this in Plan Change 13 (16 Papanui War Memorial Avenues).

Urban Design - Intermingling Heritage Houses with Apartment Blocks

From both a visual and practical perspective, the intermingling of traditional Christchurch housing in tree-lined streets with apartment buildings is, quite simply, bonkers. This is much more than just 'recession planes'. It is the very essence of Christchurch. Regardless of Government Requirements, this will surely lead to the destruction of Christchurch's "Garden City" reputation.

Land Use - Requirement for High Density Housing in Christchurch

The re-zoning of Paparoa Street and the Papanui area is unnecessary, because there are large tracts of land in Christchurch already zoned high density residential land that are sitting undeveloped. These will take many years to develop and populate, and avoid the requirements to rezone Paparoa Street and its surrounds.

Community - Destruction of Property Values

The first apartment to go up in the general Papanui area will lead to a downward slide of property value across the area. For many people, whose property is their major financial asset, this will cause widespread dissatisfaction.

Decisions Sought:

Given the multiplicity of items of concern, we propose that the boundary line for High Density Residential zoning be along Harewood Road and Main North Road to the North and West, and the area to the South and East of this boundary line is zoned Residential Suburban.

Photos submitted (with acknowledgements to Google Maps for some screen shots):





















Christchurch City Council

Our proposed Housing and Business Choice Plan Change (14)

Attached Documents Name						
Prefered method of contact Email						
Submission Date: First name:	02/05/2023 Robin	Last name:	Parr			
Submitter Details	00/05/0000					

Sunlight Access

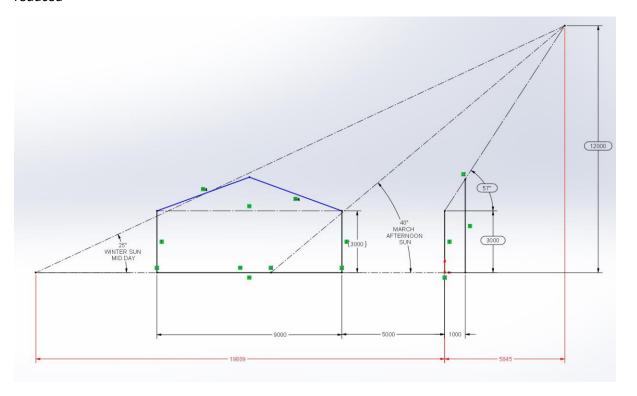
Please keep existing heights & angles of Recession planes at boundaries, currently 2.3m & 36° on our section, proposed MDRS is 4m & 60°.

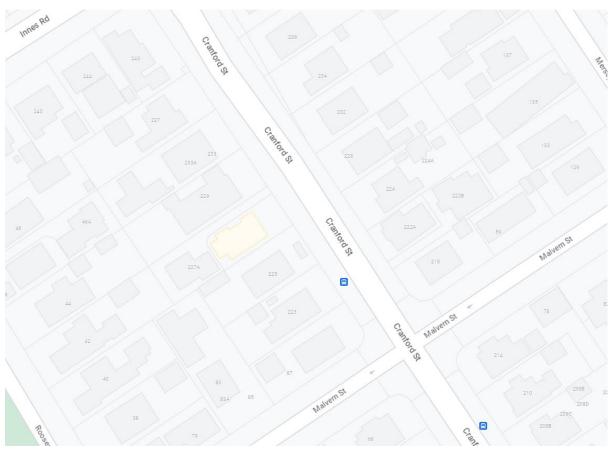
Our single-story house on Cranford/Malvern St (plus all other houses with a similar section orientation in this area) i.e. long side of the section runs NE/SW, in the proposed MRZ will lose almost all their sun for almost half of the year! This would significantly increase our heating requirements and costs to keep warm and greatly reduce our quality of life & ability to spend time outdoors in the sun. This would also completely block the sun from our decks, BBQ area, vegetable gardens and our children's outside playing areas

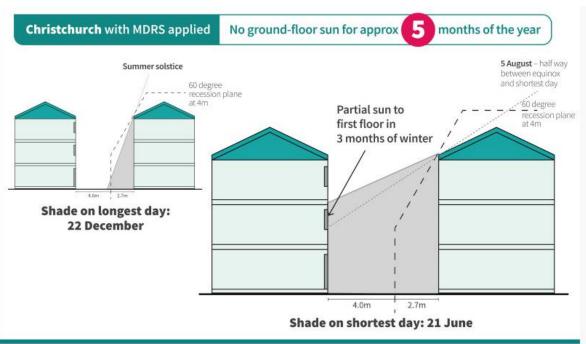
Even with the proposed Chch Qualifying Matter applied we would still lose most of our sunlight if the new building was 12m tall

We are intending to fit solar panels in the near future to try and reduce our power bills and be more environmentally friendly, but these would be in shadow for up to half the year if the new proposal goes ahead greatly reducing their efficiency to the point where they wouldn't be worth while

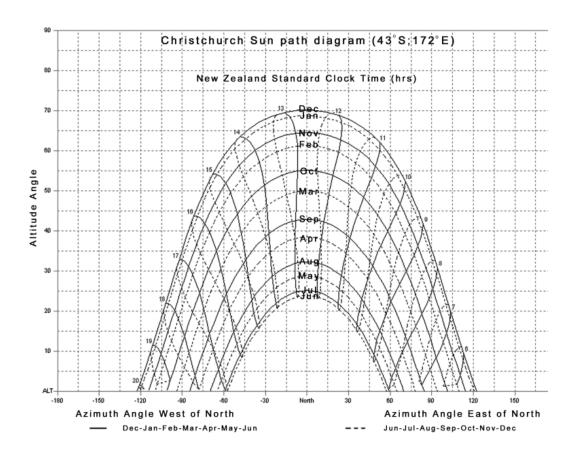
The proposed Qualifying Matters won't help as this will still cast a shadow 20m long in winter completely shading our whole section (see diagram), it is stated in the proposal you want to "protect and enhance property values", but you will be reducing ours unless this height and angle are greatly reduced







The Sunlight Access Qualifying Matter proposes to modify this approach to better reflect Christchurch' specific latitude and climate. It ensures a more equitable outcome across Tier 1 councils, providing for sunlight access at all levels of a building, ncreasing sun exposure, whilst better protecting and enhancing property values. A comparison of the MDRS and what we propose is provided in the table below.



Our proposed Housing and Business Choice Plan Change (14)



Submitter Details

Submission Date: 02/05/2023

First name: Susan Last name: Thomas

Prefered method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Oppose

I seek the following decision from the Council

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

My submission is that:

I am already alarmed by the sudden flurry of community housing being built in the old Banks Avenue School grounds - and on other side of Banks Avenue ,where expensive homes and a retirement complex used to be - and along New Brighton Road and Bampton Street.

I am reliably informed that one builder is buying up land and then going to neighbours telling them what they are building - and since it will adversely affect their properties, suggesting they therefore sell their adjoining property to him in Bampton Street.

Recently, 7 cars were broken into and two stolen on one night in what used to be a safe and peaceful area...

With the introduction of the new community properties at the back of Banks Ave School, parked cars are cluttering the already narrow streets (Belfield in particular) and a sudden influx of supermarket trolleys are both indicators of the lower socio standards coming into the area.

This can only increase as the infill continues and the area slides into disrepair (some now throwing the lawn clippings over the fence onto the footpath) and vehicles lining the streets.

All surrounded by red zones and flood zones.

Such a shame in what used to be a very pleasant area that average people could live in, play in and enjoy.

I am therefore opposed to the change in the Resource Management Act.

Christchurch City Council

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details						
Submission Date: First name:	02/05/2023 Jenny	Last name:	Crooks			
Prefered method of contact Email						
Attached Documents		Name -				
Name council rezoning 2023						

25A GREENHAVEN DRIVE, BURWOOD, CHRISTCHURCH, 8083.

Legal description Lot 40 DP 23572,

Lot 1 DP 303482, Pt RS 1818 Canterbury Dist

Property area (hectares) 1.2818

INTRODUCTION:

Our land area is 1.2818 Hectares – our 6.1m wide driveway is zoned Residential, and the bulk of the land is zoned Rural Fringe. On the East boundary of our property is Snellings waterway – which is where CCC currently have the city boundary, along this boundary, but not directly abutting us (due to Snellings Waterway and Clare Park) are residential properties. The North, South and West boundaries that are adjoining, feature a landscaped water retention area, and the balance of the East boundary has Clare Park next to us.

PROXIMITY TO FACILITIES:

There is a bus stop an easy 2-3 min walk on either side of Burwood Road (in front of, and opposite Waitakiri School). Shops are situated an easy 4 min walk away on both corners of Burwood Road, by Burwood Hospital. Approximately a 4-minute drive will have you at The Palms Shopping Centre, Home Base or at Preston's Shopping area. Further to this ideal situation, we also have Shirley Girls and Boys Schools, or QE facilities, approx. 3 mins drive away. We are on a residential sewer and water supply, with rubbish collection, paper, and mail delivery.

Therefore, every requirement under the new Government guidelines have been met, for the proposed sub-division rules, except the issue with the "City Boundary" abutting our East side.

REASON FOR REQUEST:

We have previously had CCC inform us that we cannot sub-divide this property, because it has already been sub-divided. We will explain this, by the following history:

We have owned this property for some 25 years, when we purchased this land block, an 8-acre block (3.2 Hectares) it was being used for horse grazing, and has numerous piles of couches, rubbish, rats, and a dilapidated shed on it. Previous owners had been going to build a house or have a farm, or other ideas that they never followed through. We cleared many wild Kilmarnock Willows, cleaned up the area and obtained a filling consent to enable some levelling of the immediate area, for a house.

Approximately 6 months later, we were approached by the CCC (Mr Bob Hopkins) to purchase 5 acres (2 hectares), he stated "If the filling consent application had come across my desk, I would have declined it, and I will decline any further filling consents, this will render the remaining 5 acres

useless to you, if you do not sell it to the CCC, we can take it anyway under the Public Works Act. This land is required by us for a Storm Water Retention Area." I confess we were very naïve back then, having no knowledge of their powers, and subsequently, we were left rather deflated, and felt threatened by these comments. The offer was made to us by him/CCC of \$100,000 for the 5 acres, based on their interpretation – that it was "landlocked" – which in fact it was not to us, nor obviously to the CCC, who have access from the extension road from Clare Park, along our South Boundary, to their horse grazing area (also now by the new access through from Mairehau Road). Because of what we had been told there was no option existing, but to accept the offer of \$100,000 for the entire 5 acres (2 hectares).

So PLEASE NOTE: This subdivision for a substantial portion of our land, was done by the CCC for the benefit of the CCC. The outcome of the acquirement, rendered our remaining land, insufficient to sustain stock, grazing, horticulture etc. The CCC previously stated, their reason for not allowing a subsequent subdivision as "you have already sub-divided" this was again – because of their direct actions and undertaken by them.

NATURAL HAZARDS – (POSSIBLE POTENTIAL FOR ADVERSE FLOODING)

We have also been incorrectly categorised (by a study CCC or the Government requested), that in the projected "hypothetical.event of a 1/100-year flood," we had remote outlying areas, to our West and South boundary, that could be a flood risk. Records will show that Christchurch has subsequently (since this hypothetical study was done), and factually suffered the 1/100, 1/200 and 1/300 events. At no time were these "hypothetical flood prone areas" or any others, effected, in any way. We contacted the CCC to have this classification removed, but we were told "it would take an Act of Parliament to remove this." So therefore, we also, do not have any areas that could be prone to flooding in such depicted severe occurrences, evidenced by the above actual events.

POSSIBILITY OF ENCROACHMENT ON ANY NEIGHBOURS:

Any subsequent section allowance will not encroach on neighbours, this area, as explained, is surrounded by Clare Park and Water Retention Areas. The only direct neighbours are on either side of our residential driveway area.

TO QUOTE YOUR PUBLISHED REQUIREMENTS:

"We need to provide for the growth of housing and commercial centres in the best locations, to help address issues such as climate change and housing affordability. This means more houses close to our growing commercial centres, where there's good access to services, public transport networks and infrastructure. Living within easy reach of work, school and shops makes getting around easier and helps reduce transport emissions."

CONCLUSION:

We believe we have thoroughly met the above requirements and that there is NOT ANY GOOD REASON, why this land cannot be re-zoned as residential (Medium Density Residential Zoning — would be preferred — to retain the characteristics of this unique property). All that is required is only moving the Urban Fringe line from Snellings Creek, to encompass this property, CCC has the existing storm water retention area, and this specific property is useless now except for housing (as explained above). We have a 6.1m wide entrance/driveway, facilitating easy access, for extra housing, all other proximity requirements have been met, complete with existing services. This unique property is fully fenced, it also basks in sunlight, and offers existing mature trees.

Please consider this property as a logical choice for re-zoning. It will enable people to have access to all services, in a good area with nearby shops, Doctors, Chemists, a Library, excellent Schools, Sports facilities, Golf courses, a Forest, Bakery, Bus stops, Burwood Hospital, a Church etc., and your action/s of rezoning – will not encroach on any adjoining properties.

Should you wish to personally view the property, require any further details, or have any queries, please do not hesitate to contact us, we would be happy to assist.

Best regards,

Russell and Jenny Crooks,

25A Greenhaven Drive, Burwood, CHRISTCHURCH, 8083.

PH: 027-444-2070 (Russell) – 027-659-4596 (Jenny)

Email: crooksrj@xtra.co.nz

Christchurch City Council

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details			
Submission Date: First name:	02/05/2023 Simon	Last name:	Smith
Prefered method of c	ontact Email		
Attached Documents			
		Name	
CCDC - PC14_Submis	sion_Final_230502		

Christchurch City Council PO Box 73016 Christchurch

2 May 2023

Re: Submission to Housing and Business Choice Plan Change (PC14)

Dear Sir/Madam,

I refer to the proposed changes to the Christchurch District Plan which seeks to rezone Watford Street, Strowan from Residential Suburban Zone (RS) to High Density Residential Zone (HRZ).

I act on behalf of Margaret Smith, owner of No. 18 Watford Street, Strowan and write to formally submit an objection to the proposed rezoning regarding adverse environmental impacts to the low-density character of the locality including bulk and scale, overshadowing, loss of landscaped setting, increased run-off and associated traffic and parking impacts.

The basis of the objection is set out in the attached submission.

We trust that Council will consider our concerns with the proposed rezoning and rejects the associated changes with regard to the eastern portion of Strowan bound by Watford Street (East), Normans Road (South), Papapui Road (East) and Bligh's Road (North).

Should you require any further information, please do not hesitate to contact myself by email at ssmith@sjb.com.au

Yours sincerely

Simon Smith Urban Planner

BSc Hons – University of Canterbury MURP – University of Sydney Associate – SJB Planning NSW

Submission to Housing and Business Choice Plan (PC14)

1.0 Proposed changes

The proposed changes to the Housing and Business Choice Plan (PC14) in relation to Watford Street, Strowan relating to rezoning from Residential Suburban Zone (RS) to High Density Residential Zone (HRZ) (refer to Figure 1) which permits the following:

Permitted without consent

- Increase of maximum building height to 14m (without consent)
- Front set-back 1.5m
- Site coverage 50-60%
- Recession plane 3m above boundary at 50-60 degrees
- Outdoor living 20m²
- Landscaping 20% of site or payable as a financial contribution
- Street façade 20% glazed or 17.5% under specific conditions.
- Parking Not required.

Permitted with resource consent

- Increase of maximum building height to 20m (i.e. >14m to 20m with resource consent)
- Front set-back 6-8m depending on orientation.
- Site coverage 50-60%
- Recession plane 3m above boundary at 50-60 degrees
- Outdoor living 20m²
- Landscaping 20% of site or payable as a financial contribution
- Street façade 20% glazed or 17.5% under specific conditions.
- Parking Not required.

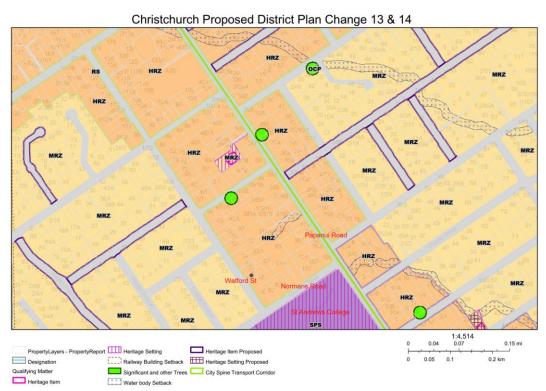


Figure 1 - Extract of proposed District Plan change 13 & 14 (NB: Location of St Andrews College to south)

2.0 Impacts

Character / Solar

Concerns are raised that the proposed rezoning to High Density Residential which results in a maximum in building height of 20m will adversely impact the low-density residential character of the eastern portion of Strowan bound by Watford Street (East), Normans Road (South), Papapui Road (East) and Bligh's Road (North).

The existing area is characterised by one to two storey single dwellings with extension landscaping plantings within the front setback. The increase in height from two to six storeys is substantial and coupled with minimal landscaping will result in an incongruous built form.

Concern is raised that the increased building height will result in adverse overshadowing noting the reliance of recession planes rather than ensuring a minimum allocation of solar access is retained to neighbouring sites.

In other jurisdictions it is common for new development to ensure a minimum of three to four hours of solar access are retained to private open space (i.e. outdoor areas) and habitable rooms.

Accordingly, the proposed rezoning will result in adverse impacts to the residential character and amenity of Strowan.

Traffic / infrastructure

Concern is raised that the proposed rezoning has not considered existing infrastructure including onstreet parking and associated traffic. This is particularly important as no off-street is required in the proposed amendments to the District Plan.

As noted in Figure 2 below, on-street parking in Watford Street and the wider locality is at capacity during school hours relative to its proximity to St Andrews College.



Figure 2 – Watford Street looking south towards Normans Road (Source: Google)

The increase in building density will result in increased demand for on-street parking in Watford Street and the surrounding locality. The increased density will in turn result in increased traffic and 'rat running' to obtain direct access to Papanui Road to the detriment of local residents.

In accordance with best practice, High Density Residential Zones should be concentred in the town centres with access to rapid public transport including light rail, trains and buses.

Christchurch does not currently have the existing transport infrastructure to justify such an increase in densities to suburban areas. Strowan is situated in the mid-point between Merivale and Papanui and is not deemed to form part of a town centre (suburban or otherwise).

Employing a 'broad brush' to rezoning is not considered to be best practice when the characteristics and infrastructure of a local area have not been adequately assessed.

With regard to infrastructure, the increase in density coupled with minimal landscaping will result in greater pressure on existing stormwater services. Concern is raised that Council has provided developers with the option of offsetting landscaping area compliance via a financial contribution. This will encourage additional hard stand areas and increase runoff into both neighbouring properties and the public realm.

Finally, it is noted that the effects of liquefaction in the locality are still being discovered some twelve years after the Christchurch earthquakes.

Therefore, concern is raised that the proposed increased density will result in greater excavation due to structural and access (including lifts) requirements for multi storey buildings.

Such excavation work will need to be carefully managed to ensure impacts to neighbouring properties are mitigated.

3.0 Conclusion

The proposed rezoning to High Density Residential (maximum height of 20m) to the easter portion of Strowan will result environmental impacts to the low-density character of the locality including bulk and scale, overshadowing, loss of landscaped setting, increased run-off and associated traffic and parking impacts.

Accordingly, it is requested that the proposed rezoning of the eastern portion of Strowan to High Density Residential is rejected.

Employing a 'broad brush' to rezoning is not considered to be best practice when the characteristics and infrastructure of a local area have not been adequately assessed.

Christchurch City Council

Our proposed Housing and Business Choice Plan Change (14)

Name Goulter - objectiom					
Attached Documents					
Prefered method of o	contact Postal				
First name:	Marilyn	Last name:	Goulter		
Submission Date:	02/05/2023				
Submitter Details					

Objection to Christchurch District Plan, Proposed Plan Change 14, under the Resource Management Act, 1991 – Marilyn Goulter

It is my understanding that, some time after the first big earthquakes in 2010, but before the killer shake in 2011, officials inspected the CTV Building. One wall of CTV's floor was apparently covered in cables, and, as taking them down to inspect the wall would have put the station off air for a day, that wall was not inspected. If this is indeed what happened it was and is entirely typical of Christchurch that business interests expect their interests to come above all other considerations.

I fear that a lesser example of the same sort of thinking is taking place with regard to the area where I live in Oakhampton St, which is proposed for high density housing. Part of the plan is that multistoreyed buildings of over four storeys, commonly as high as six storeys according to the Greater Hornby Residents' Association, and possibly as high as ten could be built here(for I have relied on the Council's site address information — when I looked up my address and "Ravensdown's" I knew all I wanted to know). My house is about 300 metres in a direct line from "Ravensdown's" fertilizer works. The planning map shows the area as simply "industrial." As Council staff have given very little indication of having actually visited the area it is questionable whether they realise quite what "Ravensdown" is, does, and worse still, what materials it has on site.

"Ravensdown" uses huge quantities of sulphur, a combustible material which gives off poisonous gases when it burns. It is not as if it just sits there quietly while it is waiting to be processed, for quantities of it give off heat when no-one is doing anything to it. Someone who worked at the plant has told me that the plant runs some sort of electrical supply line based on the energy the sulphur gives off. There have been some near misses in terms of fire there over the years, and there is apparently some risk of explosion when sulphur burns. I cannot suppose that the New Zealand Fire Service is thrilled at the prospect of ever having to fight a fire of that type in a populated area. Yet Council planners think it is appropriate to move thousands of extra people into an area with this risk factor, I suppose because they are in the mental silo of what the Act defines as relevant.

As well as this risk there are the every day health risks for vulnerable people from the fumes this plant emits. I know this from personal experience, for I grew up in Awatea Road, and in 1967 my brother, Christopher Schofield, died of complications of chronic asthma. He was not quite sixteen. Although there were other allergens it is clear that the emissions from the then "Kempthorne Prosser" plant, and not just emissions but actual sulphur particles blown from the great heap of sulphur stored outside at that time, were a constant irritant to his lungs. He was not the only asthmatic in the area to die young, and, from recollection, the Chief Medical Officer of Health for the area looked into whether he should close the plant, but decided against it, as some of the parents smoked. "Ravensdown" has much improved sulphur storage, higher chimneys, and better control of its emissions these days, but there are still windless nights when its smoke slides down the side of the chimney.

You may wonder why I chose to return to this area, feeling the way I do about this plant, but I grew up here, and this affordable house turned up here. If any hazardous event happened at that plant I feel that the existing houses, fences, and trees would provide some protection from it. This would not be the case for people living five or six floors up. Moreover, if there were people living ten floors up, they would be more or less at the top of 'Ravensdown's" chimney, and would be directly exposed to its fumes every time an easterly was blowing. Pity help them.

There are of course other objections to the plan. My main one is to the increased traffic flow on roads already heavily used. Council thinks high density housing would get people closer to their work, and so it would in some cases, but it cannot seriously think that many of the newcomers would walk to work. Their cars would be packed in among what are already crowded roads, and crowded with not just cars, but large numbers of trucks. It seems that people from all corners of the country feel the need to run a truck through Hornby, and what trucks! I often stand at the pedestrian crossings at the corner of Main South Road, Carmen and Shands Roads, and observe them. It is quite common to see three or four trucks in a row, many of them large ones with heavy loads. These include cattle, sheep, demolition, and timber trucks, but of course there are many other types of loads. Council staff may not be aware that trucks are involved in a larger proportion of road fatalities than their numbers would suggest.

If Council intends to bring in a lot of apartment dwellers to this immediate area It needs to communicate with Waka Kotahi New Zealand Transport Agency about improving crossing safety for pedestrians wanting to cross from this side of Main South Road to the supermarket and other businesses on the other side. This state highway is already a real speed track, and there is no pedestrian crossing between the other side of the Carmen/Shands Roads junction and Chappie Road. Another one at the top of Brynley Street would be a real improvement.

I am also objecting to the manner in which Council chose to communicate this zoning change to residents. If staff had thought about the matter at all, which they clearly did not, they would have realised they were communicating with a population often computer illiterate, and not well-educated. Instead of sending out a leaflet filled with well-meaning platitudes about the future and a suggestion people look the new plan up online they should have sent out maps showing the affected areas, and how they would change. What they did was a dismal failure in communication, because no-one to whom I spoke about it knew what the proposed changes were. Council staff can achieve clear communication when they want, for one couple to whom I spoke showed me their small backyard, and said Council had written to them saying they could build another house there. They had never had any wish to do this, had never asked Council about it, and have not changed their minds since receiving the letter.

In the clear expectation that Council will get its way the vultures, in the form of property developers buying up suitable properties, are hovering over this area.

If Council approves the proposed plan change 14 for this area without addressing areas of real concern which it has not so far considered it will be guilty of wilfully endangering many people's health and lives.

Marilyn Goulter

Our proposed Housing and Business Choice Plan Change (14)



Submitter Details

Submission Date: 02/05/2023

First name: Jill Last name: Edwards

Prefered method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Oppose

I seek the following decision from the Council

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

That the area surrounding and including Rose st should require a resource consent for development and that the area be zoned as a suburban character area

My submission is that:

Is that the area including and surrounding Rose st is of significant character and heritage value and that development should require a resource consent

Christchurch City Council

Our proposed Housing and Business Choice Plan Change (14)

Name PC14					
Attached Documents					
Prefered method of o	contact Email				
Submission Date: First name:	02/05/2023 James and Adriana	Last name:	Baddeley		
Submitter Details					

Our submission is that:

We are extremely concerned by the impact of the proposed rezoning to High Density Residential, on the character and coherence of our neighbourhood at Helmores Lane, specifically the area consisting of Helmores Lane, Desmond Street and Rhodes Street (to Rossall Street) (the Area). Owners and occupiers of these properties, ourselves included, have come to this Area to enjoy the amenity that the neighbourhood offers and have invested heavily in securing their properties. These property owners highly value the existing environment and the benefits it provides in terms of pleasantness and lifestyle. Previously, that character had been acknowledged by the identification of the area as a special amenity area (SAM8).

It is accepted that the Area has been subject to some residential re-development over the years, especially since the Canterbury earthquakes, nevertheless it has retained a sense of character and coherence that, we consider, is somewhat unique. It has a relationship to the Avon River and to the parklands beyond, which are part of, and provide a link to the rest of, Hagley Park. It has remained an enclave of relatively spacious residential dwellings that has also enabled the retention of many trees (including significant specimen trees) both within the streetscape and within private properties.

There are also heritage items within the Area that have been identified in the proposals for PC14. These items, including some of the surviving older residences, are an important part of the overall character of the Area. Changing the area around these items would remove their context and impact on their heritage setting.

The inclusion of this area as a High-Density Residential zone threatens to destroy this character and the coherence it provides. This is not simply a question of land values. There is much to be valued in living in an area with its own character and a sense of coherence that we seek to preserve.

Some might say that the change in zoning does not impact on this situation as the coherence will be maintained by existing landowners. This is arguable at best and in the case of the Area, overlooks that the changed zoning would itself change the equation for landowners and, more importantly those who might succeed them. The character of the Area is, in part, based on the longevity of ownership, which naturally means that changes in ownership can happen because of succession amongst other reasons. Newer owners, less invested in the character of the Area, would be free to take advantage of high-density status and, what is feared is a domino effect once the character that makes the Area so valuable to many, begins to be lost.

In addition, we note that there may also be further constraints to High (or even Medium) Density development in the area, which is identified as TC3 land and much of which is also in

the Council's own Flood Plain overlay. That is not to mention potential parking issues that would likely be created if there was a proliferation of High Density accommodation.

We acknowledge that this may not be the only area in Christchurch that holds these fears. We are firmly of the view that such views should not be unnecessarily discounted, where they can be justified.

Within the framework that the Council has chosen to given effect to the new Medium Density Residential standards and the National Policy Statement on Urban Development, we consider that there is the ability to protect what is special about this area by:

- Rezoning the area Medium Density, and identifying the Area as a Residential Character Overlay Area, with the applicable rules (as attached): or
- Rezoning the area Medium Density and imposing a further change to the qualifying matter allowing access to sunlight by making the recession plane 45°, rather that 50°, from 3m at southern boundaries: and/or
- Providing that southern boundary neighbours can be notified if resource consents for height or access to sunlight non-compliances.

There may be other ways to reduce the impacts on character of the intensifications changes which will become apparent and which we would like considered, but the key is that we think there is a need to protect the existing character. Having it identified as a Residential Character Area appears the best way, but if that is not possible, reducing the extent of any permitted intensification should be explored. At the very least, this area <u>should not</u> be zoned high density.

We seek the following decision from the Council:

- That Helmores Lane, Desmond Street and Rhodes Street (to Rossall Street) be identified
 in the Christchurch District Pan as a Medium Density Residential zone and a Residential
 Character Overlay Area and be made subject to the rules that apply to Residential
 Character areas: or,
- If Helmores Lane, Desmond Street and Rhodes Street (to Rossall Street) are not included as a Residential Character Area, that the Area be zoned Medium Density Residential: and,
- That sunlight access be better protected by further amending the medium/high density southern boundary recession plane to 45° from 3m at the boundary: and,

- That neighbours along the southern boundaries of any proposed developments that involve non-compliances with height or access to sunlight rules *can* be notified of the required resource consents and to make submissions.
- Any further or other decisions that achieve the outcomes sought by this submission, or are required as a consequence of the relief we seek.

Christchurch City Council

Our proposed Housing and Business Choice Plan Change (14)



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- Any further or other decisions that achieve the outcomes sought by this submission, or are required as a consequence of the relief we seek.

Our proposed Housing and Business Choice Plan Change (14)



Submitter Details

Submission Date: 02/05/2023

First name: Lindsay Last name: Sandford

Prefered method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Oppose

I seek the following decision from the Council

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

The change that I seek to the proposals, is a fairer way, that is much less "broad-brush", and which would move progressively, and not make blanket changes to whole areas overnight. Using Leicester Crescent in Halswall as an example, my request would be to only classify the streets immediately surrounding the nearby "Town centre zone" (which currently doesn't have a single commercial building), and the major surrounding roads as HRZ, then notify a "pathway" for streets further away (such as Leicester Crescent) to be reclassified as HRZ when a certain percentage (e.g. 50%) of housing closer to the "Town centre zone" has already been developed as higher density housing. This pathway approach would ensure that development will start closer to the commercial centre, and doesn't expand until a decent proportion of the housing closer to the zone has already been converted – and doesn't risk a massive four storey building standing like a sore thumb in the middle of an otherwise single-storey street. Done properly, a house 2 streets away would know that its classification will change in e.g. 5 years time, a house 3 streets away would have e.g. 10 years, etc.

My submission is that:

Making radical large-scale changes essentially overnight, is unfair to those who made purchasing decisions in good faith before these changes were announced. While I support enabling the densification of Christchurch over time, this needs to be done in a way that encourages changes very close to main transport routes/commercial hubs etc first, which can then spread out further over time. It needs to be fair to those who bought houses in areas with a distinctive family-friendly feel, in other words, residents should have forewarning of major change of many years (even decades), not just months or years. For example, someone currently living close to a major commercial centre should reasonably expect that it will densify first. However, someone living several streets away, where all houses are currently single-story family homes should have perhaps 10 years warning that their neighbourhood is marked for change – someone building a two-storey house next door would not raise concern, however someone building a four-storey house justifiably would. Similar to this point, the changes should also not appear piecemeal, as buildings start appearing that are completely at odds with the houses surrounding them, destroying the feel of a neighbourhood and creating fear whenever a neighbour sells their house.

The biggest losers of this change will be people who bought a house in what is currently a low density area. Then a neighbouring property is sold, and someone builds a much larger building/set of buildings on it, shading their

house/backyard. If they had specifically purchased that property for the "feel" of the neighbourhood, the sunny backyard, vege-garden etc, this plan change essentially steals that from them without compensation.

One example is: houses on Leicester Crescent in Halswell are to be classified HRZ, allowing 4 story buildings in an area of that is currently exclusively single-story housing. When these changes go into force, anyone could buy one of them and build a 14m high building, which blocks sunlight to the neighbouring properties for large parts of the year.

Our proposed Housing and Business Choice Plan Change (14)



Submitter Details

Submission Date: 02/05/2023

First name: Katie Last name: Newell

Prefered method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Seek Amendment

I seek the following decision from the Council

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

We're seeking an amendment for 76 Patten Street to be classed as a 'Medium Density Residential Zone' and to place 3 x single bedroom cottages on the one section under the new rules.

Based on the fact that this property does have great public transport access being only a 500m walk to the bus stop we do not consider this to be a 'Low Public Transport Accessibility Area' and seek your consideration on this matter.

My submission is that:

We're seeking an amendment for 76 Patten Street to be classed as a 'Medium Density Residential Zone' and to place 3 x single bedroom cottages on the one section under the new rules.

- The planning map shows this property as being in a 'Low Public Transport Accessibility Area' though there is a bus stop 500m away on Woodham Road, which is a 6 min walk. There are properties on Patten Street that are less than 120m (2 mins walk) away from this bus stop and still classed as a Low Public Transport Accessibility Area
- It's only 1.6km from the edge of the CBD or a 20 minute flat walk
- the 3 x single bed cottages proposed won't affect light with neighbouring properties, or one another
- they meet the 'Growth Challenge' which is to create more housing choice for people by providing a quality build, garden area that meets requirements, 1-2 person occupancy maximum but gives them their own space in an expensive rental market. Not everyone can afford a larger rental, or require one of this size. There are a lot of people who are looking to rent their own space and not be in an apartment, who don't require a larger house.
- This is highlighted just down the road at 60 Pattern Street where Housing NZ has put in 8 x units/small houses for people.
- Even if each cottage had 2 x people in it (1 bedroom cottage), there would still be less people and use on

services than having a 4 bedroom house on the section with a secondary dwelling

- The cottages would reach a wide market of people requiring an option where they have low maintenance gardens, their own home, off street parking. Eg working professionals, the elderly, people living on their own, people starting out in the property market
- The colonial styled cottages are a quality build which won't affect the character of the area





View from Patten Road along shared access way

Street Frontage

The sketch model views opposite illustrate the anticipated relationship of the cottages to the street.

Two cottages are located fronting the street and address the corner location, with separate driveways and entrances front Retreat Road and Patten Street. Set back at least 6m from the road, there is potential for generous tree planting and landscaping to retain the existing street charater. To the rear, the third cottage is accessed from a shared driveway off Patten Street.

This proposal would require an additional vehicular cross over off Retreat Road, however there is an existing dropped kerb which originally provided a pedestrian crossing which is no longer used (red zone opposite).





Aerial view looking west

Our proposed Housing and Business Choice Plan Change (14)



Submitter Details

Submission Date: 02/05/2023

First name: Bernard Last name: Hall JP (Retired)

Prefered method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Support

I seek the following decision from the Council

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

Please retain RYAN STREET, CHRISTCHURCH, 8011 as a CHARACTER STREET without multistory infill structures.

My submission is that:

I have lived at 14 Ryan Street since March 1974. During this time the street has won street awards for its presentation as a community. Residents have mowed the berms and looked after its over all presentation. At one time tour buses would travel down the street so people could enjoy it. Residents were/are proud of the street. We raised 4 sons in our house. And have proudly looked after ou.r gardens.

I understand the trees are classified as Heritage Trees, unfortunately the contracter TreeTech is too casual.

Sadly we were shocked to see 2 story infill housing under construction in the street and now live in fear that they may be built next door to us and destroy our life style what is left of it, I am 87 years old. I spent 35 years serving my comuinty as a JP now retired.

Needless to say we love Ryan Street classified as a Character Street.

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:

Our proposed Housing and Business Choice Plan Change (14)



Submitter Details

Submission Date: 02/05/2023

First name: Richard Last name: Moylan

Prefered method of contact Email

Consultation Document Submissions

Provision: Chapter 6 General Rules and Procedures

Seek Amendment

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area: I recommend confirming the sunlight qualifying matter and enhancing it to provide for outdoor washing drying.

My submission is that:

Strongly support the strategy of sunlight qualifying matter. Please add consideration for effectiveness of washing lines.

The declaration of climate emergency should facilitate planning that enable outdoor washing drying so there needs to be sufficient sunlit space for that to occur on cloudless winter days. The MDRS risks increasing the use of inefficient indoor drying, or for those who can afford it: extra power use for clothes dryer. Generation build is no longer keeping up with the electrical growth due to decarbonisation of process heat and transport. There is elevated risk in the short term of insufficent generation during winter peaks.

The current government is supportive of climate friendly planning so should see the benefit of this enhancement.

Our proposed Housing and Business Choice Plan Change (14)



Submitter Details

Submission Date: 02/05/2023

First name: John Last name: Lieswyn

Prefered method of contact Email

Consultation Document Submissions

Provision: Chapter 7 Transport

Seek Amendment

I seek the following decision from the Council

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

My submission is that:

7.2.1.4 should not say that car parking should 'support the recovery of the Central City;'. In fact this is counterproductive to the new addition about reducing transport emissions.

And how do you define 'significantly adversely affect the demand for public transport'? Basically any applicant can argue that their development with zillions of car parks doesn't significantly adversely affect PT.

- 7.2.1.6 mentions convenient cycle parking, but the subsequent standard is not convenient if it is not fully weather protected and the user is expected to have to lift their heavy e-bike up to a hanging hook.
- 7.4.4.3 says in part: 'v. Whether the provision, design and location of cycle parking facilities may disrupt pedestrian traffic, disrupt active frontages, or detract from an efficient site layout...' I believe that 'efficient site layout' is a get out of jail free card for developers and should be struck from the Plan.

Appendix 7.5.2 should be more prescriptive to ensure that cycle parking is actually safe, weather protected and convenient. It should also reference: https://www.nzta.govt.nz/resources/cycle-parking-planning-and-design/ for spacing and other design criteria.

 \forall

Christchurch City Council

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details				
Submission Date:	02/05/2023			
First name:	Paul	Last name:	McNoe	
Prefered method of o	contact Email			
Attached Documents				
		Name		
Submission on PC14 PM				A
christchurch-central	-recovery-plan-residentia	al-chapter-30-january-2015		
Gazette notice Central City Recovery Plan - A Livable City - 29 Jan 2015				

Christchurch Central Recovery Plan

Te Mahere 'Maraka Ōtautahi'

Residential chapter – January 2015

A Liveable City

He tāone e whai wāhi ai te whānau







Published in January 2015 byCanterbury Earthquake Recovery Authority Christchurch, New Zealand

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Citation

Canterbury Earthquake Recovery Authority (2015). A Liveable City - Christchurch Central Recovery Plan: Residential chapter - January 2015. Christchurch: Canterbury Earthquake Recovery Authority.

Imagery Credit

Some imagery sourced from the Christchurch Central Recovery Plan

ISBNs

978-0-478-39792-5 (Print) 978-0-478-39793-2 (Online)



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Contents

Rārangi upoko

The Christchurch Central Recovery Plan was notified in the New Zealand Gazette on 31 July 2012 and had effect from that date. It recognised how important inner city living is to the vitality and functioning of the central city. It also anticipated more detailed information would be added after a review of the District Plan central city Living Zones by Christchurch City Council. This document provides that detail: it puts forward a vision and objectives for central city living, along with several initiatives to stimulate the development of housing and communities and in this way help central Christchurch to recover and thrive.

This document was developed by the Canterbury Earthquake Recovery Authority (CERA). Public consultation took place in July and August 2014.

Once Gazetted, this "A Liveable City" residential chapter has effect as an addendum to the Christchurch Central Recovery Plan and contains changes to the central city residential provisions of Christchurch City Council's District Plan.

A Liveable City5	Appendix: District Plan Provisions 18
Inner City Living6	Introduction19
Enabling Recovery8	Changes to Volume 2 of the City Plan20
New East Frame Neighbourhood12	Changes to Volume 3 of the City Plan21
Catering for Diverse Communities14	Changes to the Planning Maps35
Statutory Direction to Amend the District Plan 16	Planning Maps36



Artist's impression of the Ōtākaro/Avon River

A Liveable City

He tāone e whai wāhi ai te whānau

Successful cities need attractive central city neighbourhoods with diverse communities to support business growth and development, and bring life to the city centre.

The centre of Christchurch will be a highly desirable place to live for people who seek an urban lifestyle. Quality housing of different sizes and types will be home to thriving communities that are engaged with the life of the central city.

Thousands living in the Central City in a wide range of housing.

The central city population will support,

urban amenities and the opportunities

Share an Idea, Community Expo

Inner city vibrancy – this means inner city living and socialising. Higher density housing than what we had pre-quakes. It gives Chch soul.

Share an Idea, Community Expo

Stop urban sprawl by moving to a medium density city model.

Share an Idea, Community Expo

Inner city living

He Nohoanga Pokapū

A vibrant and thriving central city needs the support of the people living there. Successful city centres are the engines of economic development and growth, and people are their heart and soul.

To become one of the best small cities in the world, Christchurch needs a city centre that is:

- an inspiring place to live
- an attractive place to invest
- the best urban environment in New Zealand.

made gradually, but the earthquakes set it back significantly as many central city amenities were lost. Yet, although the task of revitalisation is now more challenging, there is also a unique opportunity to create the inner city environment that Christchurch people want.

As the Recovery Plan Blueprint takes shape, central Christchurch will develop into an exceptional environment with a range of stimulating activities. It will be the location of choice for those people who are looking for an urban lifestyle with a diverse range of housing options. Throughout the central city there will be opportunities for residential development that recognises and is influenced by the local context.

The importance of a substantial inner city population within Christchurch cannot be overstated with regard to its benefit for the retail core.

Tony DiMasi, Retail Expert

Part of the recovery

The communities of central Christchurch will enjoy the benefits of new investment in leisure, cultural and entertainment facilities, as well as enhanced amenity and transport. In turn, these residents will help accelerate and support the economic recovery of the central city by giving confidence to the commercial sector.

To help achieve the Christchurch Central Recovery Plan vision, residential development needs to be enabled and catalysed. International findings suggest that cities the size of Christchurch require three to six per cent of their population living in the central city to support a prosperous commercial and entertainment hub. In Christchurch this equates to between 12,000 and 24,000 people based on population projections.

A unique opportunity

Even before the earthquakes, revitalising the centre of Christchurch as the regional focus for commerce and entertainment was widely recognised. Progress towards this goal was being



St Mary's Apartments, Christchurch



Conference Street, Christchurch



Madison Apartments, Christchurch

What people want

Recent research has shown that a substantial number of Christchurch residents would consider living in the central city at some stage during their lives.

While fewer people are inclined to live in the city centre during the rebuild phase, many would still consider making the move early to take advantage of what the constantly evolving centre has to offer.

People want central city neighbourhoods that are intimate,

walkable places with distinct character and strong, inclusive communities. They want an authentic urban living experience including being close to cafés, shops and amenities. They want to feel safe and secure, and have access to great schools and good jobs. They want urban environments with high aesthetic value, open space and trees. Because the place we live in fundamentally contributes to our overall wellbeing, our decision about where to live is important. In time, more people will choose inner city living as appealing new neighbourhoods are developed alongside the existing communities.



Re:START Mall, Christchurch



Courtyard at Baretta, Christchurch



Hagley Park, Christchurch

Making it happen

To make residential development happen, this document includes a package of initiatives designed to stimulate demand for inner city living and improve the market conditions that developers need to create high-quality housing and living environments. The initiatives include amendments to the District Plan, a new residential neighbourhood in the East Frame, the Breathe housing showcase, a medium density housing development in the Central City Mixed Use Zone, and a new mixed-tenure development model. Together with the anchor projects, these initiatives will help instil the confidence needed to grow the central city residential population and create vibrant communities, which will in turn support business growth.

CERA, Christchurch City Council and other government agencies will continue to work with the private sector to investigate what is needed to unleash the potential for residential development in the city centre.

New buildings of 3 to 4 floors will help keep people in the centre. High population density brings life to cities and creates economic viability.

Share an Idea, Community Expo



Re:START Mall, Christchurch

Enabling recovery

Te tautoko i te Haumanutanga

The Recovery Plan is concerned with both regenerating the business area and expanding the opportunities for high-quality inner city living so that each can support the other.

The Recovery Plan aims to improve the living environment with good urban design and comprehensive development.

To help achieve this goal, new Central City Residential Zone provisions have been developed. They provide an easy, quick way for flexible and variable development to go ahead, while at the same time requiring any such development to meet certain standards. These standards will benefit new residents and protect the amenity of those residents who have already made their home in the central city.

For the amended planning provisions for the Central City Residential Zone, see the Appendix.

Rebate for residential development

To support the proposed planning framework and promote residential development in the central city, Christchurch City Council is rebating development contributions for residential developments within the avenues provided they meet certain criteria. If developments are adding at least one more residential unit to what previously existed on the site and meet good design requirements, they may be eligible for a full rebate of the residential component.

The rebate fund is capped at \$10 million. The scheme will end on 30 June 2016 and developments must be under construction by that date. Other criteria may also apply.

Keep the city compact.
The more compact it is,
the more vibrant it will be
– don't fear high density,
but demand high quality.

Share an Idea, Community Expo





Canterbury Museum



Watermark project, Te Papa Ōtākaro/Avon River Precinct





Traditional central city living

Neighbourhoods with intimate character and established

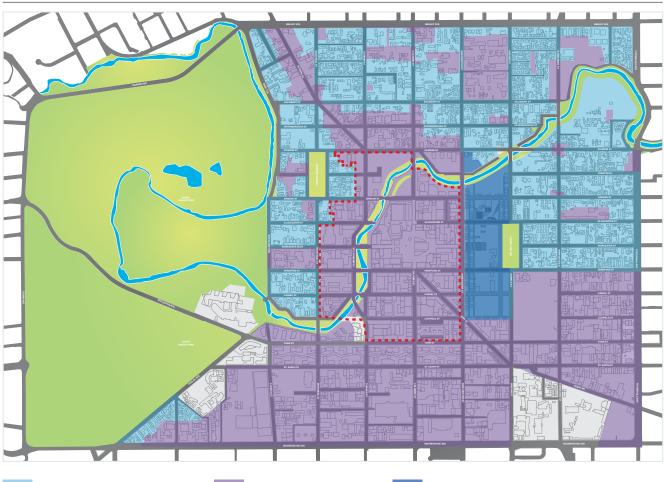


East Frame neighbourhood

A new urban neighbourhood in a park setting with all the advantages of living next to the commercial core.



Central city residential opportunities



Traditional central city living

Mixed use opportunity

East Frame neighbourhood

Core



Mixed use opportunity

apartment living in the heart of the city where downtown is your living room.

New East Frame neighbourhood

He Nohoanga Hōu ki te Rāwhiti

The East Frame will become home to a new residential community alongside a distinctive public park.

This new neighbourhood of over 1,500 people will contribute substantially to the life of the city, and encourage further growth of communities in the surrounding area. The central park will provide amenity in the eastern side of the central city, which currently has limited public open space.

The Government's contribution

In contributing to the development of the East Frame, the Government will:

- establish the new central park an outstanding open space, 40–50m wide, running north–south through the length of the East Frame
- build cycleways, walking paths, spaces for community gardens and new planting within a contemporary urban park setting
- create the Margaret Mahy Family Playground – suitable for the whole family from toddlers to grandparents
- prepare the balance of the land for sale to private developers for residential development by creating grassed areas with full services to the boundary
- establish a clear planning environment using rules in the District Plan and/or via other methods including contractual arrangements to ensure that high-quality townhouses and apartments are enabled.

The new central park has been designed to be a high-quality and safe public space. Overlooking it will be new residential homes and apartments, providing a safe neighbourhood for locals and visitors to enjoy the amenities of inner city living.

Keeping it active

Creating a new residential community is likely to take some years. While this work is progressing, the area will be greened and made available for transitional activities that support the long-term vision for the central city as the thriving commercial heart of one of the great small cities in the world.

Eco friendly/sustainable buildings of imaginative design, plenty of light/space and greenery.

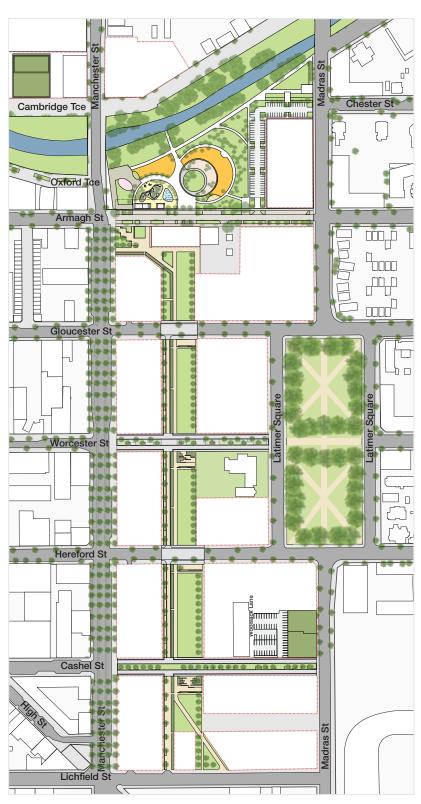
Share an Idea, Community Expo



Artist's impression of East Frame central park



Artist's impression of Margaret Mahy Family Playground



Indicative East Frame master plan

Implementation

Infrastructure and amenities: CERA

Housing delivery:Private sector

Indicative construction date: Central Park, site preparation and infrastructure – complete late-2015

Development parcels

Catering for diverse communities

Hei Tautoko i ngā Hapori Kanorau

Breathe

To put innovation at the heart of residential redevelopment, Christchurch City Council and the Ministry of Business, Innovation and Employment, in partnership with CERA and Te Rūnanga o Ngāi Tahu, collaborated to deliver the Breathe International Urban Design Competition. Entrants were asked to come up with a new way of living in the central city, incorporating the themes of sustainability, innovation and identity.

The competition was won by a team of international designers who partnered with a Canterbury construction firm. The winning entry demonstrated how high quality medium density housing can be delivered in Christchurch. The design showcases a well-balanced blend of style and quality with a range of

innovative features, such as the use of the LVL timber system developed by the University of Canterbury, and the new Armadillo™ Foundation System developed by the team themselves.

399 Manchester Street

Housing New Zealand is in partnership with private sector developers and is building mixed-tenure apartments of an excellent standard in the inner city. The Manchester Street development is an exciting example of the innovation that can be achieved in inner city residential development. It shows how high-quality housing can be produced at lower risk to developers and at lower overall cost to Housing New Zealand. An important aspect of this approach will be to replicate it in specific areas throughout the city centre, helping

to make the central city attractive and accessible to a wide range of residents.

For further detail contact Housing New Zealand, or visit www.hnzc.co.nz

Medium density residential living

The Ministry of Business, Innovation and Employment is working with the private sector to facilitate medium density housing development on Christchurch City Council owned land at 36 Welles Street. The development will contribute to revitalisation of the inner city and help to relieve pressure on the housing market, through increasing supply of more affordable central city housing.



Winning design for the Breathe International Design Competition



Artist's impression of Housing New Zealand development, 399 Manchester Street, Christchurch



Winning design for the Breathe International Design Competition

Statutory direction to amend the district plan

Tohutohu ā ture ki te whakatika Te Mahere-ā-Rohe

The Recovery Plan recognises that the existing Living Zones in the Christchurch City Plan result in an unduly and unnecessarily complex planning environment. It directed a review of those zones in order to give effect to the objectives of the Recovery Plan.

The new Central City Residential Zone is the result of that review. Its purpose is to provide an environment within which the vision of the Recovery Plan can be realised: an exciting and sustainable central city that attracts permanent residents to live, work and play in an environment that is safe, accessible to everyone and responsive to future changes.

New Central City Residential Zone

The primary objective of the new Central City Residential Zone (see the Appendix) is to balance:

- the need for flexibility in the way that a range of housing types can be designed and built in the inner city, with
- the need to ensure the outcome (specifically the amenity) of such developments is sufficiently certain for current residents and to ensure that potential residents feel confident about moving into the area.

Appropriately balancing these often competing needs is critical to the success of the Central City Residential Zone and its contribution to the regeneration of the central city as a whole.

The Central City Residential Zone ensures that certain 'bottom lines' (development standards) for new development are met. The development standards fall into two packages:

- 1. measures to provide amenity for owners and occupiers of the dwelling such as:
 - a. minimum unit sizes
 - b. location and size of outdoor living spaces.
- 2. measures to manage the interface with neighbours and the public realm such as:
 - a. height, setbacks and recession planes
 - b. fences and landscaping.

Other than with respect to urban design considerations, developments that comply with this small number of prescribed development standards will be permitted activities and will be able to proceed without resource consents.

Potential benefits and costs of minimum standards

The proposed development standards will allow residential developments to progress more quickly, potentially increasing the availability of residential properties in the central city, as well as reducing overall costs for developers. They will provide certainty for investors, developers, designers and home owners with a clear assurance of minimum standards of amenity, but without constraining flexibility to provide housing that varies in design, pricing and quality above this minimum standard.

Certain minimum standards, such as landscaping requirements, may increase development costs. Other standards, such as height restrictions and limitations on non-residential activity, may constrain some people's development aspirations. While these standards may add cost and constrain some development, they have been weighed up against the benefits of providing desired amenity, and the benefits are considered to outweigh the costs. Care has been taken to ensure the proposed development standards are not so high as to raise the overall cost of residential development.

Resource consents

In circumstances where residential development cannot comply with the above standards, resource consent will be required. However, the assessment of the consent application will be limited to the assessment matters clearly set out in the zone provisions.

Where development will result in more comprehensive development (three units or more), an urban design standard will apply, enabling the consenting authority to undertake an assessment of wider urban design considerations. To prevent alternative forms of development being promoted that would undermine urban design considerations, further controls are imposed to protect the integrity of the rule. Such consents will not be notified.

Urban design guidance

Non-statutory urban design guidance will be developed by CERA in partnership with Christchurch City Council. The guidance will aid interpretation and understanding of key urban design principles relevant to resource consent applications for multi-unit residential development.

Relationship with the Central City Business and Central City Mixed Use Zones

The Residential Zone provisions are designed to complement the Central City Business and Central City Mixed Use Zones included in the Recovery Plan. The way that the Central City Business and Mixed Use Zones relate to the Central City Residential Zone is managed to protect and promote residential development. To protect the amenity in the residential zone, activities within the business and mixed zones must manage their effects within their zone boundaries. In this way a range of activities can readily continue alongside each other in a high-quality, diverse and vibrant central city.

The Residential Zone provisions are also designed to complement the transport provisions introduced through *An Accessible City*, the transport chapter of the Christchurch Central Recovery Plan.

Statutory direction

In accordance with section 24(1)(a) and (b) and section 24(2) of the Canterbury Earthquake Recovery Act 2011, Christchurch City Council is directed to amend its District Plan as set out in the Appendix of this "A Liveable City" addendum to the Recovery Plan. These changes provide for a new Central City Residential Zone.

Christchurch City Council shall make these amendments as soon as practicable but no later than two weeks after the Gazettal of this amendment to the Christchurch Central Recovery Plan.





Appendix: District Plan Provisions

Ngā wāhi o Te Mahere-ā-Rohe

Introduction

Pursuant to section 24 of the Canterbury Earthquake Recovery Act 2011 ("CER Act"), the Christchurch Central Recovery Plan has directed the inclusion and removal of specific objectives, policies, rules and other methods in Christchurch City Council's District Plan (also referred to as the "City Plan").

Section 24 does not entitle a Recovery Plan to direct amendment of descriptions, explanatory guidance and statements, reasons, anticipated outcomes, implementation and/or monitoring provisions. As such, these matters are not included within the amendments directed.

The amendments are to be made by Christchurch City Council as soon as practicable without the use of Schedule 1 of the Resource Management Act 1991 or any other formal public process.

Understanding the changes

A new Central City Residential Zone is added to the City Plan. This also requires consequential amendments to other existing provisions including the removal of the Living 4A, B, and C Zones as they relate to the Central City. In each instance the deletions are shown in **strike through and bold**, while the new provisions are in **underline and bold**. Text before a changed provision and text after a changed provision is indicated by the use of "(...)". Instructions to add understanding of what is to be amended, and to direct other consequential amendments are included in text boxes.

Every effort has been made to ensure that the changes specified in the Christchurch Central Recovery Plan give the reader a full and fair understanding of the exact change proposed. For this reason, substantive changes have generally been shown in context, whereas consequential changes have generally been summarised and grouped. It should be noted, however, that given the complexity of the changes proposed to the existing District Plan, readers are encouraged to view these amendments alongside the District Plan, which is available online under the title "City Plan".

Changes to Volume 2 of the City Plan

Amend Policies 11.4.8 Parking, 11.4.9 Noise, and 11.5.2 Urban Design for Infill and Redevelopment in Volume 2, Part 11 Living, by including reference to the 'Central City Residential Zone' where reference is made to the Living 3 and Living 4 Zones.

Add the following Objectives and Policies to Volume 2, Part 11 Living:

Objective 11.12 - Role of the Central City Residential Zone

A predominantly residential environment offering a range of residential opportunities, including medium to high density living, within the Central City to support the restoration and enhancement of a vibrant city centre.

POLICIES

- 11.12.1 To restore and enhance the Central City by:
- (a) providing flexibility for a variety of housing types which are suitable for a range of individual housing needs;
- (b) providing for a progressive increase in the residential population of the Central City;
- (c) assisting with the creation of inner city residential neighbourhoods.
- 11.12.2 To ensure non-residential activities in the Central City Residential Zone:
- (a) are of a small scale;
- (b) are compatible with residential activities;
- (c) do not compromise the role of the Central City Residential Zone or Central City Business Zone, or the aim of consolidating that area of the Central City or the Central City Mixed Use Zone;
- (d) meet the needs of the local residential community or would benefit from the high level of amenity inherent in the Central City Residential Zone

Objective 11.13 - Built Form and Amenity

A form of built development in the Central City Residential Zone that enables change to the existing environment, while contributing positively to the amenity of the area, and to the health and safety, and quality and enjoyment of the environment for those living within the area.

POLICIES

- 11.13.1 Provide for different maximum building heights in areas of the Central City Residential Zone with some areas requiring a reduced height compatible with the existing predominant character.
- 11.13.2 Prescribing minimum standards for residential development which:
- (a) are consistent with higher density living;
- (b) protect amenity values for residents;
- (c) integrate development with the adjacent and wider neighbourhood;
- (d) provide for a range of current and future residential needs.
- 11.13.3 Protect residential amenity by controlling the character, scale, and intensity of non-residential activities.

Changes to Volume 3 of the City Plan

Amend the definition of 'net floor area' in Volume 3: Part 1 Definitions as follows:

Net floor area

Shall be the sum of the floor areas, each measured to the inside of the exterior walls of the building or buildings, and shall include the net floor area of any accessory building, but it shall exclude any floor area used for:

- lift wells, including the assembly area immediately outside the lift doors for a maximum depth of 2 metres;
- stairwells (including landing areas);
- tank rooms, boiler and heating rooms, machine rooms, bank vaults;
- those parts of any basement not used for residential, shopping, office or industrial uses;
- toilets and bathrooms in all zones except the Central City Residential Zone, provided that in the case of any hotel, or travellers accommodation the maximum area permitted to be excluded for each unit shall be 3m²;
- 50% of any pedestrian arcade, or ground floor foyer, which is available for public thoroughfare;
- parking areas required by the Plan for, or accessory to, activities in the building.

Amend the rules and assessment matters in 4.0 – 4.4 and 15.2 of Volume 3, Part 2 Living Zones, as necessary to delete provisions and references relating to the:

- L4A (Central City Diverse) Zone;
- L4B (Central City and North Beach High Rise) Zone, as they relate to the Central City only;
- L4C (Central City and Central New Brighton Character) Zone, as they relate to the Central City only including the Avon Loop;
 and
- Special Amenity Areas (SAM's) within the Central City only.
- Rule 4.1.5 Corner of Hagley Avenue and Moorhouse Ave other activities only.

Add the following Central City Residential Zone rules to Volume 3, Part 2 Living Zones:

4a.1 Activity Status: Central City Residential Zone

4a.1.1 PERMITTED ACTIVITIES

- (a) Unless specified as a discretionary activity under rule 4a.1.3, all activities shall be Permitted Activities, provided they comply with all of the relevant development and critical standards, and the city wide standards.
- (b) Notwithstanding (a) above the development of Lot 1 Deposited Plan 475662, for the purposes of a residential demonstration project, is a permitted activity and is not required to comply with any other provisions in the City Plan provided that:
 - (i) There are not less than 50 units and not more than 90 units, accepting that the development of these units may proceed in stages of not less than 9 units at a time with the first stage to comprise not less than 10 units and all units to be completed by 30 June 2020
 - (ii) Any building does not exceed 15m in height;
 - (iii) The gross floor area of all non-residential activities does not exceed 525m² and is situated at ground floor

4a.1.2 RESTRICTED DISCRETIONARY ACTIVITIES

Any activity that does not comply with any one or more of the relevant Development Standards under Clause 4a.2, but does comply with all of the relevant critical standards under Clause 4a.3 and all of the city wide standards, and which is not otherwise listed as a discretionary activity shall be a restricted discretionary activity, with the exercise of the Council's discretion restricted to the listed Assessment Matter(s).

Resource consent applications in relation to non-compliance with any Development Standards (other than 4a.2.3, 4a.2.5 or 4a.2.7) shall not be publicly or limited notified.

4a.1.3 DISCRETIONARY ACTIVITIES

- (a) Any educational, spiritual, pre-school, health facility or travellers accommodation other than on sites with frontage to Fitzgerald Avenue or Bealey Avenue (between Durham Street North and Madras Street) which does not meet the development standards for a permitted activity but which complies with all of the city wide standards and critical standards and has a gross floor area of less than 200m² shall be a discretionary activity.
- (b) A residential demonstration project that does not comply with 4a.1.1(b) shall be a discretionary activity.

4a.1.4 NON-COMPLYING ACTIVITIES

Any activity that is neither a permitted activity or otherwise listed as a restricted discretionary or discretionary activity or does not comply with any one or more of the critical standards under clause 4a.3 shall be a non-complying activity.

Attention is drawn to the provisions of the city wide standards which may result in an activity being prohibited, non-complying, discretionary, controlled, or permitted notwithstanding the provisions of these Zone Rules.

4a.2 Development Standards for Central City Residential Zone

4a.2.1 MINIMUM UNIT SIZE

The minimum net floor area (including toilets and bathrooms) for any residential unit (excluding car parking, garaging, or balconies allocated to each unit) shall be:

Studio	35m ²
1 Bedroom	45m²
2 Bedroom	70m²
3 or more Bedrooms	90m²

Resource consent applications for non-compliance with this Rule will only be assessed against the following matters:

- (a) The extent to which the floor area of the unit/s will maintain amenity for residents and the surrounding neighbourhood;
- (b) The extent to which other on-site factors may compensate for a reduction in unit sizes e.g. communal facilities:
- (c) The nature and duration of activities proposed on site which may warrant a reduced unit size to operate;
- (d) Whether the units are to be operated by a social housing agency and have been specifically designed to meet atypical housing needs.

4a.2.2 GROUND FLOOR HABITABLE SPACE

- (a) Any residential unit fronting a road or public space, unless built over an accessway or another residential unit, shall have a habitable space located at ground level;
- (b) At least 30% of all residential units within a development shall have a habitable space located at ground level;
- (c) Each habitable space located at the ground level of a residential unit shall have a minimum floor area of 12m² and a minimum internal dimension of 3m.

Resource consent applications for non-compliance with this Rule will only be assessed against the following matters:

- (a) The extent to which engagement between residential activity and ground level open space, including the street, is adversely impacted by the loss or reduction of a habitable space at ground level;
- (b) The ability of an undersized habitable space to continue to be used for functional residential activity.

Amend the definition of "height" in Volume 3, Part 1 Definitions, by:

- amending the explanation and diagram enabling exceedance of the maximum height in the Living 4 and 5 zones by 3.5m, so that it does not apply to the Central City Residential Zone or Living 5 Zone within the Central City; and
- amending clauses (c) and (d) to delete reference to the Living 4A Zone, and include reference to the Central City Residential Zone.

4a.2.3 BUILDING HEIGHT

The maximum height of any building shall be as shown on planning maps 39B and 39D.

Resource consent applications for non-compliance with this Rule will only be assessed against the following matters:

- (a) Compatibility with the scale of other buildings in the surrounding area, and the extent to which building bulk is out of character with the local environment;
- (b) Any effect of increased height on the amenity of neighbouring properties, including through loss of privacy, outlook, overshadowing or visual dominance of buildings;
- (c) The extent to which an increased height is necessary to enable more efficient, cost effective and/or practical use of the site, or the long term protection of significant trees or natural features on the site.

4a.2.4 OUTDOOR LIVING SPACE

- (a) A minimum of 24m² of outdoor living space shall be provided on site for each residential unit;
- (b) The required outdoor living space for each residential unit can be provided through a mix of private and communal areas, at the ground level or in balconies, provided that:
 - (i) Each residential unit shall have private outdoor living space of at least 8m² in total, not occupied by parking or access;
 - (ii) Private outdoor living space shall have a minimum dimension of 4m when provided at ground level and a minimum dimension of 1.5m when provided by a balcony;
 - (iii) At least one private outdoor living space is to be directly accessible from a living area of that residential unit;
 - (iv) Outdoor living space provided as a communal space shall be accessible for use by all on site residents and shall have a minimum dimension of 4m;
 - (v) 50% of the outdoor living space required across the entire site shall be provided at ground level.
- (c) Any communal space may be located indoors provided its use is explicitly for a recreation activity for the exclusive use of the residents of, and guests to the units on the site.

Resource consent applications for non-compliance with this Rule will only be assessed against the following matters:

- (a) The extent to which outdoor living areas provide useable space, contribute to overall on-site spaciousness and enable access to sunlight throughout the year for occupants;
- (b) The accessibility and convenience of outdoor living space for occupiers;
- (c) The extent and quality of communal outdoor living space or other open space amenity to compensate for any reduction in private outdoor living space;
- (d) The extent to which a reduction in outdoor living space will result in retention of mature on-site vegetation, or adversely affect spaciousness of the surrounding area.

4a.2.5 SUNLIGHT AND OUTLOOK FOR NEIGHBOURS

Buildings shall not project beyond a building envelope constructed by recession planes from points 2.3m above boundaries with other sites as shown in Part 2, Appendix 1

except that

- (i) where an internal boundary¹ of a site abuts an access lot, access strip, or access to a rear lot, the recession plane may be constructed from points 2.3m above the furthest boundary of the access lot, access strip, or access to a rear lot or any combination of these areas;
- (ii) where buildings on adjoining sites have a common wall along an internal boundary the recession planes shall not apply along that part of the boundary covered by such a wall.

¹ Note: The level of internal boundaries shall be measured from filled ground level except where the site on the other side of the internal boundary is at a lower level, then that lower level shall be adopted.

Resource consent applications for non-compliance with this Rule will only be assessed against the following matters:

- (a) Any effect on the amenity of neighbouring properties, including through loss of privacy, outlook, overshadowing or visual dominance of buildings;
- (b) The extent to which the intrusion is necessary to enable more efficient, cost effective and/or practical use of the remainder of the site, or the long term protection of significant trees or natural features on the site.

Amend Appendix 1, Volume 3, Part 2, Living, to:

- delete reference to the Living 4A Zone on recession plane containment diagram D and E; and
- apply recession plane containment angle diagram E to the Central City Residential Zone.

4a.2.6 STREET SCENE AND ACCESSWAYS

- (a) For sites fronting Bealey Avenue, buildings shall be set back a minimum of 6m from the road boundary of Bealey
 Avenue:
- (b) In the locations indicated on planning map 39E, buildings shall be set back a minimum of 4.5m from road boundaries;
- (c) In all other instances, buildings shall be set back a minimum of 2m from road boundaries.

except that

- (i) where a garage has a vehicle door facing a road, the garage door shall be set back a minimum of 4.5m unless the garage door projects outward, in which case the garage door shall be set back a minimum of 5.5m;
- (ii) where a garage has the vehicle door facing a shared accessway, the garage door shall be set back a minimum of 7m measured from the garage door to the furthest formed edge of the adjacent shared access unless the garage door projects outwards, in which case the garage door shall be set back a minimum of 8m;
- (iii) for street fronting residential units, garages, carports, and other accessory buildings (excluding basement car parking and swimming pools) shall be located at least 1.2m further from the road boundary than the front facade of any ground level habitable space of that residential unit.

Resource consent applications for non-compliance with this Rule will only be assessed against the following matters:

- (a) The extent to which the proposed building will detract from the coherence, openness and attractiveness of the site as viewed from the street and adjoining sites, including the ability to provide adequate opportunity for garden and tree planting in the vicinity of road boundaries;
- (b) The extent to which the intrusion is necessary to enable more efficient, cost effective and/or practical use of the remainder of the site, or the long-term protection of significant trees or natural features on the site;
- (c) The ability to provide adequate parking and manoeuvring space for vehicles clear of the road or shared access to ensure traffic and pedestrian safety;
- (d) The effectiveness of other factors in the surrounding environment in reducing the adverse effects, such as existing wide road widths, street plantings and the orientation of existing buildings on adjoining sites.

4a.2.7 SEPARATION FROM NEIGHBOURS

- (a) Buildings that immediately adjoin an access lot, access strip, or access to a rear site shall be set back a minimum of 1m from that part of an internal boundary of a site.
- (b) Buildings shall be set back a minimum of 1.8m from other internal boundaries of a site.

except that:

- (i) No set back is required from an access lot or access strip on the same site, provided that any windows on the ground floor facing and within 1m of the access lot or strip are non-opening;
- (ii) No setback for accessory buildings is required, provided the total length of walls or parts of accessory buildings facing and located within the set back is less than 10.1m and/or where the accessory building faces the ground floor window of a habitable space on the adjoining site it shall be setback minimum of 1.8m from that neighbouring window for a minimum length of 2m either side of the window;
- (iii) No set back is required along that part of an internal boundary where buildings on adjoining sites have a common wall along the internal boundary;

- (iv) No set back is required for basements, provided that any part of a basement located within 1.8m of an internal boundary is wholly below ground level;
- (c) Parts of a balcony or any window of a living area at first floor level or above shall not be located within 4m of an internal boundary of a site, except that this shall not apply to a window at an angle of 90° or greater to the boundary, or a window or balcony which begins within 1.2m of ground level (such as above a garage which is partly below ground level).

Resource consent applications for non-compliance with this Rule will only be assessed against the following matters:

- (a) Any effect of proximity of the building on the amenity of neighbouring properties, including through loss of privacy, outlook, overshadowing or visual dominance of buildings;
- (b) Any adverse effect on the safe and effective operation of site access;
- (c) The ability to provide adequate opportunities for garden and tree plantings around buildings;
- (d) The extent to which the intrusion is necessary to enable more efficient, cost effective and/or practical use of the remainder of the site, or the long term protection of significant trees or natural features on the site.

4a.2.8 SERVICE SPACE

- (a) Each residential unit shall be provided with at least 3m² of outdoor or indoor service space at ground floor level for the dedicated storage of waste and recycling bins²;
- (b) The required space for each residential unit shall be provided either individually, or within a dedicated shared communal space, but shall not be located between the road boundary and any habitable space.

Resource consent applications for non-compliance with this Rule will only be assessed against the following matters:

- (a) The extent to which the alternative provision for storage facilities affects the convenience and accessibility of those facilities for building occupiers;
- (b) The extent to which communal service space which equates to less than 3m² per unit is sufficient to meet the expected requirements of building occupiers;
- (c) The extent to which overlooking, and engagement with, the street, or the amenity of surrounding properties, is adversely affected by the location of service space;

4a.2.9 FENCES AND SCREENING

- (a) Service space for the storage of waste and recycling bins for residential units shall be fully screened from any site, road and outdoor living space which adjoins the service space;
- (b) Parking areas shall be screened on internal boundaries by landscaping, wall(s), fence(s), or a combination of these to a minimum height of 1.5m from any adjoining site. Where this screening is by way of landscaping it shall be for a minimum depth of 1.5m and the minimum height shall be the minimum height at the time of planting;
- (c) Other than for screening of the required area of service space under Rule 4a.2.8 or for screening the required areas of outdoor living space required under Rule 4a.2.4, fences and other screening structures³ shall not exceed 1m in height where they are located either:
 - (i) within 2m of the road boundary; or
 - (ii) on the boundary with any land zoned Conservation or Open Space,

except that the maximum height shall be 2m if the whole fence or screening structure is at least 50% transparent.

Resource consent applications for non-compliance with this Rule will only be assessed against the following matters:

- (a) The extent to which storage facilities and parking areas are visually integrated, screened or otherwise accommodated to minimise adverse amenity or visual impacts on surrounding properties (including units within the same development) or public spaces;
- (b) The extent to which a partial screening structure or reduction in visual transparency may be more visually appropriate or suited to the character of the site or area, or is appropriate to provide privacy or security;
- (c) The extent to which the screening structure is varied in terms of incorporating steps, changes in height, variety in materials, or incorporates landscaping and avoids presenting a blank, solid facade to the street or to Conservation or Open Space Zoned land.

² Note: Volume 3, Part 13, Rule 2.4.4 also requires the provision of secure cycle parking facilities for each residential unit, where garaging is not otherwise provided for that unit.

³ Note: For the purposes of this rule, a fence or other screening structure is not the exterior wall of a building or accessory building

4a.2.10 LANDSCAPING AND TREE PLANTING

- (a) A minimum of 20% of the site shall be provided for landscape treatment (which may include private or communal open space), including a minimum of one native tree for every 250m² of gross site area (prior to subdivision), or part thereof;
- (b) All trees shall be not less than 1.5 metres high at the time of planting;
- (c) All trees and landscaping required by this rule shall be maintained and if dead, diseased or damaged, shall be replaced.

Resource consent applications for non-compliance with this Rule will only be assessed against the following matter:

(a) Any reduction in landscaping on the amenity of the site and for neighbouring properties, including the street or other public open spaces.

4a.2.11 URBAN DESIGN APPEARANCE AND AMENITY

The erection of new buildings and alterations or additions to existing buildings, that result in:

- (i) three or more residential units; or
- (ii) one or two residential units on a site smaller than 300m² gross site area

including all accessory buildings, fences and walls associated with that development, shall be a restricted discretionary activity in relation to urban design, appearance and amenity, with the exercise of the Council's discretion limited to the following assessment matters:

The extent to which the development, while bringing change to existing environments:

- (a) Engages with and contributes to adjacent streets, lanes and public open spaces.
- (b) Integrates access, car parking and garaging in a way that is safe for pedestrians and cyclists, and that does not dominate the development.
- (c) Has appropriate regard to:
 - (i) residential amenity for occupants, neighbours and the public, in respect of outlook, privacy, and incorporation of Crime Prevention Through Environmental Design principles; and
 - (ii) existing design styles and established landscape features on the site or adjacent sites.
- (d) Provides for human scale and creates sufficient visual quality and interest.

4a.3 Critical Standards for Central City Residential Zone

4a.3.1 SCALE OF ACTIVITIES

- (a) For educational, spiritual, pre-school, health facilities or travellers accommodation the maximum gross floor area of buildings plus the area of any outdoor storage used for activities other than residential activities shall be 200m² except that this gross floor area limit shall not apply to sites with frontage to Fitzgerald Avenue or Bealey Avenue (between Durham Street North and Madras Street).
- (b) For all other non-residential activities the maximum gross floor area of buildings plus the area of any outdoor storage used for activities other than residential activities shall be 40m².

4a.3.2 RESIDENTIAL COHERENCE

Only those persons who reside permanently on the site can be employed in any activity other than residential activities on the site, except that this rule shall not apply to:

- (i) sites with frontage to Fitzgerald Avenue or Bealey Avenue (between Durham Street North and Madras Street);
- (ii) for educational, spiritual, pre-school, educational or health facilities with a gross floor area of buildings plus the area of any outdoor storage used for non-residential activities between 41m² and 200m²; or
- (iii) travellers accommodation with a gross floor area of buildings plus the area of any outdoor storage used for non-residential activities between 41m² and 200m², in which case at least one person employed in the activity shall reside permanently on site.

4a.3.3 HOURS OF OPERATION

Other than for travellers accommodation that has a gross floor area of buildings plus the area of any outdoor storage used for non-residential activities of less than 200m², the maximum total number of hours the site shall be open to visitors, clients or deliveries for any activity other than residential activities shall be 40 hours per week, and shall be limited to between the hours of:

0700 - 2100 Monday to Friday, and

0800 - 1900 Saturday, Sunday, and public holidays

(Refer also to City Rules, Part 11, Clause 1, Noise)

4a.3.4 TRAFFIC GENERATION

The maximum number of vehicle movements per site for any activity other than residential activities shall be:

- Heavy vehicles 2 per weekOther vehicles 16 per day
- except that:
- (i) for educational, spiritual, daycare, health facilities, and travellers accommodation on sites with access to Fitzgerald Avenue or Bealey Avenue (between Durham Street North and Madras Street), the maximum number of vehicle movements per site shall be 200 per day⁴; and
- (ii) this rule shall not apply to educational, spiritual, pre-school, health facilities and travellers accommodation that has a gross floor area of buildings plus the area of any outdoor storage used for non-residential activities of between 41m² and 200m² and which are located on sites with frontage to Main Distributor, Local Distributor or Arterial Roads not covered by 4a.3.4(a)(i).

4a.3.5 STORAGE OF HEAVY VEHICLES

The maximum number of heavy vehicles stored on a site for any activity shall be one.

4a.3.6 RESTRICTION ON OUTDOOR ACTIVITIES

All manufacturing, altering, repairing, dismantling or processing of any materials, goods or articles shall be carried out within a building.

4a.3.7 DISMANTLING, REPAIR OR BUILDING OF MOTOR VEHICLES AND BOATS

- (a) There shall be no dismantling, repair or building of motor vehicles, including the storage of such vehicles, except that this shall not apply to vehicles owned by people who live on the same site and which:
 - (i) Are contained within a building; or
 - (ii) If not contained within a building, involve three or less vehicles per site.
- (b) There shall be no dismantling, repair or building of boats, including the storage of such vessels, except that this shall not apply to boats owned by people who live on the same site and the boat occupies no more than 45m² of site coverage.

4a.3.8 BOARDING OF ANIMALS

Boarding of animals on a site shall be limited to a maximum of four animals in the care of a registered veterinarian for medical or surgical purposes only.

4a.3.9 MINIMUM RESIDENTIAL DENSITY

The minimum residential site density to be achieved when a site is developed or redeveloped with a residential unit or units shall be not less than one residential unit for every 200m² of site area.

⁴ Vehicles, other than heavy vehicles associated with any residential activity on the site, shall be included in determining the number of vehicle movements to and from any site. Vehicles parking on the street or on any other site, in order that their occupants can visit the site, shall also be included in determining the number of vehicle trips to and from any site.

Amend Rules 5.0 - 5.4 in Volume 3, Part 2 Living Zones, as follows:

5.1.1 RESIDENTIAL ACTIVITIES AND OTHER ACTIVITIES (EXCEPT TRAVELLERS' ACCOMMODATION) - ALL STANDARDS (LIVING 5 ZONE)

All standards for the above activities shall be those for the zones specified below:

Peterborough
 Montreal
 As for the L4A Central City Residential Zone
 As for the Central City Residential Zone
 As for the L4C Central City Residential Zone
 Latimer
 As for the Central City Residential Zone

Riccarton (...)

5.2 DEVELOPMENT STANDARDS - TRAVELLERS' ACCOMMODATION ACTIVITIES - LIVING 5 ZONE

Any application arising from clauses 5.2.6, and 5.2.7 (only on sites other than those adjoining or across a road from a living, cultural or open space zone), and 5.2.8 will not require the consent of other persons and shall be non-notified.

5.2.1 SITE DENSITY

The maximum plot ratio per site shall be:

Peterborough, <u>Latimer and Montreal</u> 0.8

(...)

5.2.3 SUNLIGHT AND OUTLOOK FOR NEIGHBOURS

(a) Buildings shall not project beyond a building envelope constructed by recession planes from points 2.3m above internal boundaries as shown in Part 2, Appendix 1 as follows:

(...)

- · Diagram D Peterborough
- Diagram E Avon, <u>Latimer, Peterborough and Montreal</u>,

 (\ldots)

Amend Appendix 1, Volume 3, Part 2, Living, to apply recession plane containment angle diagram E to the Living 5 zones within the Central City.

5.2.4 STREET SCENE

The minimum setback from road boundaries for buildings and outdoor storage areas shall be 4.5 metres except that:

- the minimum setback for the L5 Zone Avon where street scene setbacks are required, shall be 2m. except for those parts of the site used for car parking adjoining Hurley Street where the setback shall be 5m, and all setbacks shall be landscaped. A solid fence with a minimum height of 1.8m shall be provided to the rear of the setback area on Hurley Street for that part of the site used for car parking.
- (c) for those areas shown on Planning Map 39G where no street scene setback is required for all parts of buildings within 3 metres of the road boundary the maximum height shall be reduced by 2m.

5.2.7 SEPARATION FROM NEIGHBOURS

- (a) The minimum building setback from any internal boundary shall be:
 - Peterborough, <u>Latimer, Montreal</u>, Avon, Riccarton, Kilmarnock, Raceway, Wigram (Sioux Avenue) and Merivale:

 (...)

3 metres

5.2.8 EXTERNAL APPEARANCE

- (a) Peterborough, Latimer, Montreal and Avon: Within special amenity areas 31 and 32 only, t The erection of new buildings and additions or alterations to existing buildings, where visible from a public place, shall be a discretionary activity with the exercise of the Council's discretion restricted to those matters set out in 15.2.8 excluding assessment matters (iv)(a) and (b), (vii)(a)-(d) inclusive and (ix)(a)-(c) inclusive. Iimited to their visual impact.
- (c) Avon: the erection of new buildings and additions or alterations to existing buildings shall be a controlled activity with the exercise of the Council's discretion limited to their visual impact.

5.4.1 SITE DENSITY

The maximum plot ratio per site shall be:

Peterborough, Latimer and Montreal: 0.9

(...)

5.4.3 BUILDING HEIGHT

The maximum height of any building shall be:

· Peterborough, Latimer, Montreal, and Avon: In accordance with planning maps 39B and 39D and 39D

Note: When assessing height in the Living 5 (Avon) Zone refer also to the definition of 'Height' in Volume 3, Part 1, which provides an exception that allows the roof area to exceed the maximum height.

(...)

Amend Appendix 4 List of Special Amenity Areas (SAM's) in Volume 3, Part 2 Living Zones, by deleting all reference to SAM's 22, 23, 23A, 24, 25, 26, 27, 30, 31, 32 and 33.

Amend the rules and assessment matters in Volume 3, Part 7, 8, 9, 10, 11, 12, 13, and 14, as necessary to:

- Replace reference to the Living 4A (Central City Diverse) Zone, and Living 4B (Central City and North Beach High Rise) Zone, with 'Central City Residential Zone' as it relates to the Central City only;
- Where the Living 4C Zone is referred to, also include reference to the Central City Residential Zone as it relates to the Central City only.

Amend the rules and assessment matters in Volume 3 Part 13 as follows:

Where provisions are added or deleted renumber remaining provisions accordingly.

2.2 Development Standards - Parking and Loading

2.2.1 PARKING SPACE NUMBERS

(...)

Activity Car parking spaces			Cycle parking spaces	Loading/unloading		
	Residents/visitors	Staff				
Column 1	Column 2	Column 3	Column 4	Column 5		
()						
Residential activities Generally:						
()						
Living 4A, 4B and 4C Zones	Residents: 1 garageable space per unit + Visitors: No parking requirement for the first 10 units, thereafter 1 space per 5 units.	N/A	Nil			

2.2.9 PARKING SPACES FOR RESIDENTIAL ACTIVITIES

(a) Garagable parking spaces for residential activities in any zone shall have the following minimum internal dimensions:

	Width	Depth
Single	3.1m	5.5m
Double	5.6m	5.5m

except where the parking spaces are provided in a multi-bay garage with no physical separation between spaces in which case they may be laid out in accordance with Appendix 1 (for sites outside the Central City) or Appendix 8 (for sites within the Central City).

- (b) The minimum width of the entrance to a single garage shall be 2.4 metres.
- (c) All other parking spaces for residential activities (outside the Central City) shall have the following minimum dimensions:

Width 2.5m Depth 5m

(...)

2.2.12 MAXIMUM GRADIENTS FOR ACCESS

- (a) Other than for residential activities in the Central City Residential Zone the maximum average gradient of any access shall be 1 in 6;
- (b) Other than for residential activities in the Central City Residential Zone the maximum gradient shall be 1 in 4 on any straight section and 1 in 6 around curves, the gradient being measured on the inside line of the curve;
- (c) For residential activities in the Central City Residential Zone, the maximum gradient of any part of an access shall be 1 in 4;
- (e)(d) The maximum change in gradient without a transition shall be no greater than 8°;
- (d)(e) Where the gradient exceeds 1 in 10 the access is to be sealed with a non-slip surfacing to enable access in wet or icy conditions;
- (e) In the Living 3 and Living 4 Zones, the maximum gradient of the ramp where it passes across a footpath shall be 3% or less.

- (f) Where an access ramp serves only residential activities in the Central City Residential Zone:
 - (i) if the ramp is less than 20m in length, the maximum average gradient shall be 1 in 4; and
 - (ii) if the ramp is 20m in length or greater, the average maximum gradient shall be 1 in 5.
- (f)(g) In the Living 3, and Living 4, and Central City Residential Zones, where the ramp provides access to more than 6 car parking spaces the gradient of the first 4.5m as measured from the road boundary shall be no greater than 1 in 10.

2.3.3 LENGTH OF VEHICLE CROSSINGS

Other than for residential activities within the Central City Residential Zone, the maximum and minimum vehicle crossing lengths shall be as follows:

Activity	Length of crossing		
	Minimum	Maximum	
Residential	3.5m	6m	
Other	4m	9m	

The length of a vehicle crossing shall be measured as the actual length of channel covers or the length of the fully dropped kerb.

Except that:

(...)

2.4.1 CAR PARKING SPACE NUMBERS - ALL ZONES WITHIN THE CENTRAL CITY (EXCEPT WITHIN THE CORE)

- (a) Other than disabled parking provided in accordance with Rule 2.4.3, no on-site car parking is required in the Central City;
- (b) Other than for the Central City Residential Zone, Iif parking is provided, the Parking Area of a site shall be no greater than 50% of the Gross Leasable Floor Area of the buildings on the site;

 Rule 2.4.1(a) does not apply to residential activities in the Living 4 Zones within the Central City and the minimum
- parking standards in Volume 3, Part 13 Rule 2.2.1 should be applied.

 (c)(c) All car parking other than for residential activities is to be constructed in compliance with the dimensions in Appendix 8;
- (d) All car parking for residential activities is to be constructed in accordance with Volume 3, Part 13, Rule 2.2.9.

NOTE: Where the parking standard results in a fractional space, any fraction under one half shall be disregarded. Any fraction of one half or more shall be counted as one space.

2.4.2 Parking area location - All Zones within the Central City

Parking for a residential activity in the Living 4 Zones may be provided on a site within a 200m walking distance of the site on which the activity is undertaken.

2.4.3 PARKING FOR PEOPLE WITH DISABILITIES – ALL ZONES WITHIN THE CENTRAL CITY

- (a) Other than parking areas for residential activities, if a parking area is provided, provision shall include spaces for people with disabilities at the rate of 1 for up to 20 spaces provided, 2 for up to 50 spaces provided plus 1 more for every additional 50 spaces or part thereof. These parking spaces for people with disabilities shall be provided as close as practicable to the accessible entrance to the activity with which they are associated and the most direct route from the disabled parking spaces to the activity shall be accessible for mobility impaired persons.
- (b) Other than residential activities, aAll buildings with a Gross Floor Area of more than 2500m² are required to provide parking spaces for people with disabilities, even if no other parking spaces are provided. If no other parking spaces are provided, the amount of disabled parking spaces required shall be calculated by determining how many disabled parking spaces would be required if 1 standard parking space per 100m² Gross Floor Area were provided.

NOTE: For the avoidance of doubt there is no requirement to provide parking spaces for people with disabilities with respect to residential activities in the Central City.

2.4.4 CYCLE PARKING - ALL ZONES WITHIN THE CENTRAL CITY

- (a) For any activity provision shall be made for **visitor and staff** cycle parking in accordance with Table 6 except that for any activity where the building has no road frontage setback for the entire length of the site visitor cycle parking is not required;
- (b) Where **Y**<u>u</u>isitor cycle parking <u>is required it</u> shall be located within 30m of at least one pedestrian public entrance to the activity;
- (c) Where Sstaff cycle parking is required it shall be located so it is easily accessible for staff of the activity. Staff cycle parking may be provided on a site within 200m of the site on which the activity is undertaken;
- (d) Residential cCycle parking for residential activities shall be located at or below ground floor level;
- (d)(e) All on-site manoeuvre areas shall be designed to accommodate the turning path of a cycle as shown in Appendix 9; (e)(f) The design of cycle parking facilities shall meet the following criteria:
 - (i) Visitor cycle parking shall consist of stands that:
 - · Are securely attached to an immovable object;
 - Support the bicycle frame;
 - · Are clearly signposted or visible to cyclists entering the site;
 - · Comply with the lighting requirements in Clause 2.2.15 (Volume 3 Part 13);
 - Are able to be detected by the visually impaired in areas where the public have access.
 - (ii) Staff <u>and residential</u> cycle parking shall consist of a stand or enclosed space that:
 - Allows the bicycle to be secured;
 - Is covered;
 - If a stand is provided, it meets the visitor cycle parking requirements.

Table 6 - Minimum Cycle Parking Standards in all Zones within the Central City					
Activity	Visitor Cycle Parking	Staff Cycle Parking	Residents		
Retail	1 space/350m ² GLFA	1 space/200m ² GLFA	n/a		
Food and Beverage	1 space/125m² PFA	1 space/400m ² PFA	n/a		
Office	1 space/500m ² GFA	1 space/150m ² GFA	<u>n/a</u>		
ACCOMMODATION:					
Travellers' Accommodation (except Hotels)	1 space/20 beds	1 space/80 beds	n/a		
Hotels	1 space/30 bedrooms	1 space/80 bedrooms	n/a		
EDUCATION:					
Pre-school/Primary	1 space/5 pupils	1 space/100 pupils	n/a		
Secondary	3 space/4 pupils	1 space/100 pupils	<u>n/a</u>		
Tertiary	1 space/4 FTE students	1 space/100 FTE Students	n/a		
RESIDENTIAL					
Residential units	Nil	Nil	1 space / unit unless car parking for that unit is provided in a single or double garage.		

For all other activities, the cycle parking rates in Clause 2.2.1 Table 1 apply.

Where the cycle parking requirement results in a fractional space, any fraction under one half shall be disregarded. Any fraction of one half or more shall be counted as one space.

2.4.7 ACCESS TYPE AND DESIGN - ALL ZONES WITHIN THE CENTRAL CITY

All vehicular access to and within a site, shall be in accordance with the standards set out in Table 7 below.

Table 7 – Requirements for Vehicular Accesses Ways							
Activity	Number of Parking Spaces Provided	Minimum Legal Width (m)	Minimum Trafficable Width (m) (4) (5)	Turning area	Passing area (4)	Sealed and drained	Height (m) (3)
Residential and offices	1 to 3	3.0	2.7	(1)	No	(2)	3.5
Residential and offices	4 to 8	3.5(<u>5</u>)	3.0	(1)	Yes	Yes	4.0
Residential	More than 8	<u>5.0</u>	4.0	(1)	<u>Yes</u>	<u>Yes</u>	4.0
Residential and oOffices	9 to 15	5.0	4.0	(1)	Yes	Yes	4.0
Other	15 or fewer	6.0(<u>5</u>)	4.5	(1)	Yes	Yes	4.0
All- activities Offices and Other	More than 15	6.5(6)	5.5	(1)	No	Yes	4.0

Clarification of Table 7:

- (1) See Clause 2.4.8 for when turning area required.
- (2) See Clause 2.2.12(d).
- (3) Height refers to the minimum clear height from the surface of the formed access.
- (4) For vehicular access ways that are less than 5.5m trafficable width, passing opportunities of at least 5.5m wide and 6.0m long must be provided at least every 50m along the access way.
- (5) The access shall accommodate a continuous pedestrian footpath along the site road frontage. The length of the on-street fully dropped kerb shall be a maximum of 1m wider than the trafficable width.
- (6)(5) For non-residential development, wWhere the access is also designed to accommodate pedestrian movements, this width shall be increased by 1.5m.

2.4.9 QUEUING SPACES - ALL ZONES WITHIN THE CENTRAL CITY

Queuing space shall be provided on site for all vehicles entering a parking or loading area. The length of such queuing spaces shall be in accordance with Table 8 below. Where the parking area has more than one access the number of parking spaces may be apportioned between the accesses in accordance with their potential usage. Queuing space length shall be measured from the road boundary to the nearest vehicle control point or point where conflict with vehicles already on the site may arise, except that for residential development within the Living 4 Zones Central City Residential Zone not served by an Arterial Route or for sites served from a Local Distributor Street within the Core or Inner Zone, or a Local Street within the Core or Inner Core, queuing space length shall be measured from the kerb face, or edge of the nearest traffic lane where no kerb is provided, to the nearest vehicle control point or point where conflict with vehicles or pedestrian pathways already on the site may arise.

	Table 8 - Queuing space lengths		
Number of parking spaces provided	Minimum queuing space length (m) for Residential Activities within the Central City Residential Zone not served by an Arterial Route and for sites accessed from Local Distributor Streets within the Core and Inner Zone, and Local Streets within the Core and Inner Zone. vehicular access from Arterial Routes, Main-Distributor Streets, Local Distributor Streets within the Outer Zone, and Local Streets within the Outer Zone.	Minimum queuing space length (m) in all other cases. for Residential Activities within the L4 Zone and for sites accessed from Local Distributor Streets within the Core and Inner Zone, and Local Streets within the Core and Inner Zone.	
1 - 20	5.5 <u>6.7</u>	6.7 <u>5.5</u>	
21 - 50	10.5 6.7	6.7 - <u>10.5</u>	
51 - 100	15.5 - <u>11.7</u>	11.7 <u>15.5</u>	
101 - 150	20.5 - <u>11.7</u>	11.7 <u>15.5</u>	
151 or over	25.5 - <u>16.7</u>	16.7- 25.5	

2.4.14 VEHICLE ACCESS TO SITES FRONTING MORE THAN ONE STREET - ALL ZONES WITHIN THE CENTRAL CITY

If a site fronts more than one street then vehicular access shall be gained from the most preferred street that the site has frontage to, as shown in Table 11. Except that, where the higher preference street is a one-way street or is divided by a raised median, a second access point may be gained from the next most preferred street.

<u>(...)</u>

2.4.15 PEDESTRIAN SAFETY

Where a vehicle access serves more than 15 car parking spaces or more than 10 heavy vehicle movements per day will be generated through a vehicle access then:

- (a) If the site provides an access onto any street within the Core then an audio and visual method warning pedestrians of the presence of vehicles about to exit the access point shall be provided.
- (b) If the site provides access onto any street within the Inner Zone or Outer Zone, then either an audio and visual method of warning pedestrians of the presence of vehicles can be provided as above or a visibility splay shall be provided to the pedestrian footpath as shown in Figure 2. If any part of the access lies within 20m of a Central City Residential Zone, any audio method should not operate between 8pm to 8am.

Changes to the Planning Maps

Amend Planning Maps 39A to 39F to the extent that the attached maps deviate from 39A – 39F. Delete planning map 39G

Amend any other Maps, Appendices, Tables or Diagrams to the extent that the attached maps require.

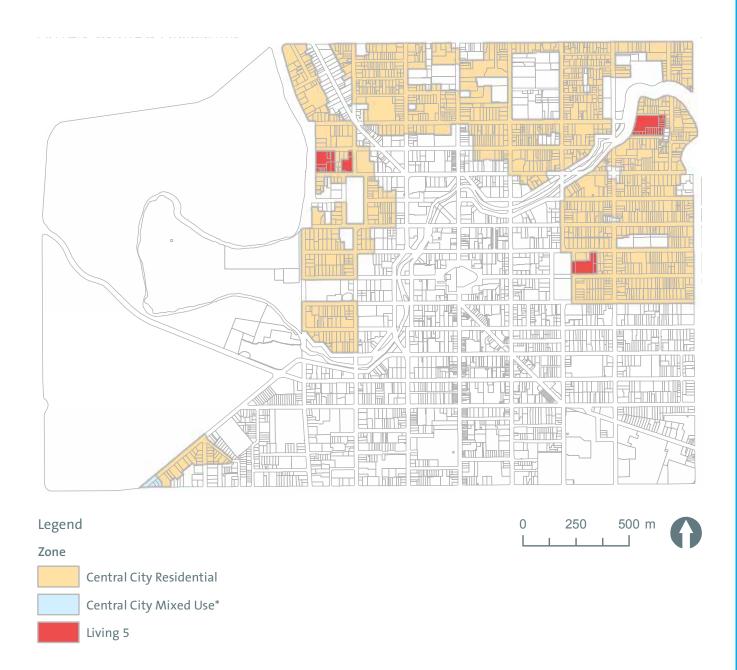


Planning Maps

Mapi Hoahoa

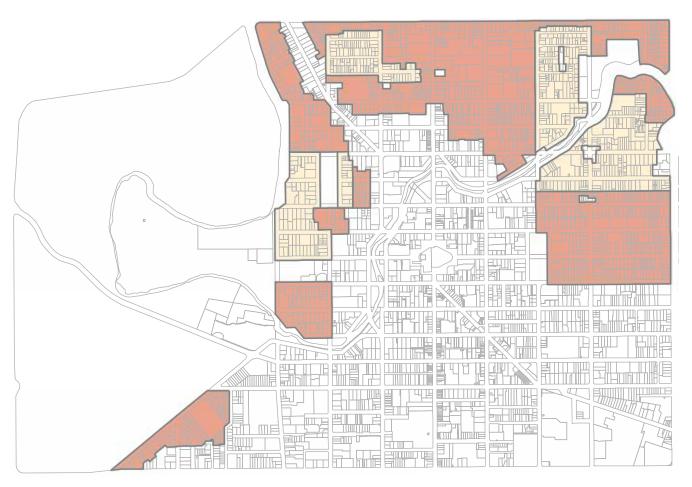
Christchurch Central Recovery Plan

Map 1 Central City Living, Living 5 and Mixed Use Zones



*Note: this area is in addition to the Central City Mixed Use Zone shown in Appendix 1 of the Christchurch Central Recovery Plan

Map 2 Central City Building Heights



Legend

Maximum Building Height







Map 3 Central City Building Setbacks



Legend

4.5m Road Boundary Setback

0 250 500 m



< Back to search results

Departmental

Christchurch Central Recovery Plan – A Liveable City Commencement Notice

29 JAN 2015 Pursuant to the Canterbury Earthquake Recovery Act 2011, the Minister for Canterbury Earthquake Recovery gives the following notice.

Notice

- Title—This notice is the Christchurch Central Recovery Plan A Liveable City Commencement Notice.
- 2. Amendment—Following a review under section 22 of the Canterbury Earthquake Recovery Act 2011, I have decided to amend the Christchurch Central Recovery Plan by inserting a new residential chapter called "A Liveable City".
- Commencement—The new residential chapter is issued and comes into effect on 29 January 2015.
- **4. Inspection**—The "A Liveable City" residential chapter is available on the Christchurch Central Development Unit's website

www.ccdu.govt.nz

Reference copies of "A Liveable City" will be available from 10 February 2015 at the Canterbury Earthquake Recovery Authority's office at Level 8, HSBC Tower, 62 Worcester Boulevard, Christchurch, and libraries and service centres in the district of the Christchurch City Council.

Dated at Wellington this 28th day of January 2015.

Hon GERRY BROWNLEE, Minister for Canterbury Earthquake Recovery.

Tags

Canterbury Earthquake Recovery Act

Recovery Plan

Christchurch Earthquake Recovery Authority

Notice Number 2015-go116

Issue Number

View PDF





Submitter Details

Submission Date: 02/05/2023

First name: Traci Last name: Mendiola

Prefered method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Seek Amendment

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area: 8 gilders grove, Heathcote, Christchurch plus caveated land.

My submission is that:

Dear, Christchurch City Council

I am writing to submit a proposal for the rezoning of my property located at 8 Gilders Grove, Heathcote, Christchurch.

andnbsp;

We would like to highlight some additional information that we believe would support our proposal:

andnbsp;

Avoca Valley was once a horticultural enclave, but now no households make significant income off the land anymore. The area has been impacted by the 2010 and 2011 earthquakes, with many residents losing their homes and way of life. The geotechnical advisors to the EQC deemed the entire other side of Avoca valley road as red zone due to rockfall. Many of these residents did not want to leave the Avoca valley area due to its perfect location; but were forced to none the less. Many of these residents did not want to leave the Avoca Valley area due to its perfect location but were forced to do so; with some fighting the EQC to remain in their houses regardless of rock fall. We were approached by some of these residents who desperately wanted land as they didn't want to have to relocate like many others did.

andnbsp;

One question that may arise when considering our proposal is why our property currently has two different zonings. The answer is that our property spans across two zones due to a previous town planning decision. We are one of if not the only property in Christchurch that carries these two different zones. This therefore giving us not only two separate zones but also carry the addresses of 4 and 8 Gilders grove.andnbsp;

to an urban area is more suitable and justified, given the location, access to essential infrastructure, and proximity

to other urban areas.

andnbsp;

The location of our property provides easy access to essential infrastructure, making travel to numerous areas in Christchurch a breeze. The nearby local bus stop provides additional transport options, with convenient links to the central city. As an essential worker for the CDHB, I can be at work within 20 minutes even on the busiest days, thanks to Brougham Street/Port Hills Road, which connects to the bottom of Avoca Valley Road, with only one turn down Colombo St providing swift access into Christchurch Central. On the transportation front, the local bus stop linking Gilders Grove to the Christchurch city center is only a short walk away. This proximity to public transportation ensures that the property will be convenient and accessible, enabling potential residents to commute to town and other critical services with ease. My property is in compliance with the transportation section of the District Plan. Upon reviewing the transportation section of the District Plan, I am pleased to note that my property is in line with the guidelines and objectives set out in the plan. The property is conveniently located near bus routes; My children, whom are now fully grown were able to take the '28' bus service from the bottom of the hill too their respective schools all over the Christchurch area. It is also easily accessible by car through the road network.

andnbsp;

Furthermore, the proposed new subdivision adjacent to my property is likely to further improve the transportation infrastructure in the area. As per the section on 'Transportation Networks' in the District Plan, the Council aims to develop transportation networks that are safe, efficient, sustainable, and integrated.

andnbsp;

Our proposal is supported by a range of compelling reasons that make the rezoning of our property an eminently sound choice. Some of the reasons why we are proposing the change of zoning include:

andnbsp;

Supporting the Medium-Density Plan Objective: The proposed urban zoning of our property aligns with the medium-density plan, which seeks to provide sustainable urban development, additional housing opportunities, high-quality, accessible infrastructure, and a range of social and economic opportunities.

Our analysis shows that there is a real demand for medium to high-density development in the area, and our proposal offers an opportunity to provide many housing options for people of different income levels. Developments in our area are few and far between, and with the rising number of shipping and manufacturing plants in Heathcote, there is a new and increased demand for housing. According to the latest data from the Real Estate Institute of New Zealand, the median house price in Heathcote Valley has increased by 8.2% in the past year, reaching a new high of \$767,500. By rezoning our property and developing it, we can provide much-needed housing supply, which can help to relieve the pressure on prices and make homes more affordable for residents. We believe that our proposal will have a positive impact on the local housing market and help to create a vibrant, diverse community in Heathcote Valley.

andnbsp;

Promoting Economic Growth: By rezoning our property and developing it, it will create employment opportunities within the construction and management of the development. For small businesses, this could be life-changing and supply much-needed growth. My son works in the building industry and has noticed that many workers are commuting from as far as Rolleston to work over the east side of Christchurch as there are substantially more job opportunities for small businesses. This being because most of the larger commercial firms can snap up larger subdivision's contracts, leaving the smaller firms struggling. For a small firm this could be life changing and supply

much needed growth.

In conclusion, we believe that rezoning our property aligns with the Council's vision for sustainable urban development, and we hope that you will take our proposal into consideration. Our unique situation deserves a bespoke solution in-line with the Christchurch City Councils vision to align itself with governments density initiative. We have drainage for sewerage available at the bottom of our property that doesn't require pumping. We also have services to the end of the driveway ready to go if the zoning is changed and we choose to subdivide.

We are optimistic that by working together, we can achieve a mutually beneficial outcome. We welcome the opportunity to present our case to you or any party you deem necessary.

I will also be sending this letter to Sara Templeton our Heathcote ward who could provide relevant data to the area.

Thank you for your attention.

andnbsp;

Traci Lee Mendiola

Attached Documents Name mdp

The Residents of 8 Gilders Grove, Christchurch

0276225518, 0272115447 | traciflee@yahoo.com

1/4/2023

Dear, Christchurch City Council

I am writing to submit a proposal for the rezoning of my property located at 8 Gilders Grove, Heathcote, Christchurch.

We would like to highlight some additional information that we believe would support our proposal:

Avoca Valley was once a horticultural enclave, but now no households make significant income off the land anymore. The area has been impacted by the 2010 and 2011 earthquakes, with many residents losing their homes and way of life. The geotechnical advisors to the EQC deemed the entire other side of Avoca valley road as red zone due to rockfall. Many of these residents did not want to leave the Avoca valley area due to its perfect location; but were forced to none the less. Many of these residents did not want to leave the Avoca Valley area due to its perfect location but were forced to do so; with some fighting the EQC to remain in their houses regardless of rock fall. We were approached by some of these residents who desperately wanted land as they didn't want to have to relocate like many others did.



One question that may arise when considering our proposal is why our property currently has two different zonings. The answer is that our property spans across two zones due to a previous town planning decision. We are one of if not the only property in Christchurch that carries these two different zones. This therefore giving us not only two separate zones but also carry the addresses of 4 and 8 Gilders grove. The land was caveated to our Living Hills property when we purchased it in 2003. We believe that rezoning the entire property to an urban area is more suitable and justified, given the location, access to essential infrastructure, and proximity to other urban areas.

The location of our property provides easy access to essential infrastructure, making travel to numerous areas in Christchurch a breeze. The nearby local bus stop provides additional transport options, with convenient links to the central city. As an essential worker for the CDHB, I can be at work within 20 minutes even on the busiest days, thanks to Brougham Street/Port Hills Road, which connects to the bottom of Avoca Valley Road, with only one turn down Colombo St providing swift access into Christchurch Central. On the transportation front, the local bus stop linking Gilders Grove to the Christchurch city center is only a short walk away. This proximity to public transportation ensures that the property will be convenient and accessible, enabling potential residents to commute to town and other critical services with ease. My property is in compliance with the transportation section of the District Plan. Upon reviewing the transportation section of the District Plan, I am pleased to note that my property is in line with the guidelines and objectives set out in the plan. The property is conveniently located near bus routes; My children, whom are now fully grown were able to take the '28' bus service from the bottom of the hill too their respective schools all over the Christchurch area. It is also easily accessible by car through the road network.

Furthermore, the proposed new subdivision adjacent to my property is likely to further improve the transportation infrastructure in the area. As per the section on "Transportation Networks" in the District Plan, the Council aims to develop transportation networks that are safe, efficient, sustainable, and integrated.

Our proposal is supported by a range of compelling reasons that make the rezoning of our property an eminently sound choice. Some of the reasons why we are proposing the change of zoning include:

Supporting the Medium-Density Plan Objective: The proposed urban zoning of our property aligns with the medium-density plan, which seeks to provide sustainable urban development, additional housing opportunities, high-quality, accessible infrastructure, and a range of social and economic opportunities.

Our analysis shows that there is a real demand for medium to high-density development in the area, and our proposal offers an opportunity to provide many housing options for people of different income levels. Developments in our area are few and far between, and with the rising number of shipping and manufacturing plants in Heathcote, there is a new and increased demand for housing. According to the latest data from the Real Estate Institute of New Zealand, the median house price in Heathcote Valley has increased by 8.2% in the past year, reaching a new high of \$767,500. By rezoning our property and developing it, we can provide much-needed housing supply, which can help to relieve the pressure on prices and make homes more affordable for residents. We believe that our proposal will have a positive impact on the local housing



market and help to create a vibrant, diverse community in Heathcote Valley.

Promoting Economic Growth: By rezoning our property and developing it, it will create employment opportunities within the construction and management of the development. For small businesses, this could be life-changing and supply much-needed growth. My son works in the building industry and has noticed that many workers are commuting from as far as Rolleston to work over the east side of Christchurch as there are substantially more job opportunities for small businesses. This being because most of the larger commercial firms can snap up larger subdivision's contracts, leaving the smaller firms struggling. For a small firm this could be life changing and supply much needed growth.

In conclusion, we believe that rezoning our property aligns with the Council's vision for sustainable urban development, and we hope that you will take our proposal into consideration. Our unique situation deserves a bespoke solution in-line with the Christchurch City Councils vision to align itself with governments density initiative. We have drainage for sewerage available at the bottom of our property that doesn't require pumping. We also have services to the end of the driveway ready to go if the zoning is changed and we choose to subdivide.

We are optimistic that by working together, we can achieve a mutually beneficial outcome. We welcome the opportunity to present our case to you or any party you deem necessary.

I will also be sending this letter to Sara Templeton our Heathcote ward who could provide relevant data to the area.

Thank you for your attention.



Traci Lee Mendiola





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SII	hmitter	I Jetai	IS.

Submission Date: 02/05/2023

First name: Faye Last name: Hall

Prefered method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Support

I seek the following decision from the Council

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

My submission is that:



Submitter Details

Submission Date: 03/05/2023

First name: Sonya Last name: Grace

Prefered method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Support

I seek the following decision from the Council

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

I seek the following decision from the Council to make Ryan Street a Character Street and to not allow medium to high density housing into Ryan Street.

My submission is that:

Ryan Street becoming a Character Street



Submitter Details

Submission Date: 03/05/2023

First name: Mark St Last name: Clair

Organisation:

Winstone Wallboards Limited (WWB)

Prefered method of contact Email

Consultation Document Submissions

Provision: Chapter 5 Natural Hazards

Seek Amendment

I seek the following decision from the Council

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

Seek clarification on the parameters of the Tsunami Management Area Qualifying Matter mapping overlay;

Seeks Policy 5.2.2.5.2 be redrafted to clarify the intent of the Tsunami Management Area Qualifying Matter to only apply to residential intensification and risk to life, rather than property.

Seeks Rule 5.4A be redrafted to provide for-permitted activities where it does not involve residential developent

Seek to be directly engaged on upcoming release of Plan Change 12 on Coastal Hazards for implications on WWB's site.

My submission is that:

Please see submission attached, including Appendix A and Appendix B.

Attached Documents

Name

Mark Clair Submission_PC14_WWB_1_May_2023_stc

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: Winstone Wallboards Limited (WWB)

- 1 This is a submission on Plan Change 14: Housing and Business Choice 2023 to the Christchurch City Plan (**PC14**).
- 2 WWB could not gain an advantage in trade competition through this submission.
- The specific provisions of PC14 that WWB's submission relates to and the reasons for WWB's submission are set out in **Appendix A** and **Appendix B** below.
- 4 WWB's submission is that it:
 - Seeks clarification on the parameters of the Tsunami Management Area Qualifying Matter mapping overlay;
 - Seeks Policy 5.2.2.5.2 be redrafted to clarify the intent of the Tsunami Management Area Qualifying Matter to only apply to residential intensification and risk to life, rather than property.
 - Seeks Rule 5.4A be redrafted to provide for:
 - permitted activities where it does not involve residential development
 - Seeks to be directly engaged on upcoming release of Plan Change 12 on Coastal Hazards for implications on WWB's site.
- 5 The general and specific reasons for WWB's relief sought is set out in **Appendix A**.
- 6 WWB seeks the following decision from the local authority:
 - a. Grant the relief as set out in **Appendix B**;
 - b. Grant any other similar and /or consequential relief that would deal with WWB's concerns set out in this submission.
- 7 WWB wishes to be heard in support of the submission.
- 8 If others make a similar submission, WWB will consider presenting a joint case with them at a hearing.

Signed for and on behalf of Winstone Wallboards Limited by its Resource Management Consultants and authorised agents steplanning

Mark St. Clair Director

1 May 2023

Address for service of submitter: Winstone Wallboards Limited c/- Mark St. Clair stcplanning 5 Cooper Street Karori Wellington 6012 Ph 021 271 0815

Email address: mark@stcplanning.co.nz

Appendix A

INTRODUCTION

- 1 WWB welcomes the opportunity to submit on Christchurch City Council Proposed Plan Change 14: Housing and Business Choice 2023 (PC14).
- 2 The submission is broadly organised as follows:
 - Summary of WWB's submission;
 - Statement of Interest and Background;
 - General submission;
 - Specific submission in relation to the regulatory context
 - Summary of relief sought
 - Conclusion
 - Detailed relief sought (contained in Appendix B)

SUMMARY

Submission in Opposition to the Tsunami Management Area Qualifying Matter

- 3 WWB generally supports the Council's identifying areas that are subject to potential Tsunami risk.
- 4 However, WWB's key concerns regarding the Tsunami Management Area Qualifying Matter relates to the following matters:
 - (a) Mapping Extent of the Tsunami Management Area Qualifying Matter Overlay
 - (b) The provisions of the Qualifying Matter and how they are applied.
- 5 WWB seeks the following in relation to mattes (a) and (b) above:
 - Seeks clarification on the parameters of the Tsunami Management Area Qualifying Matter mapping overlay;
 - b. Seeks Policy 5.2.2.5.2 be redrafted to clarify the intent of the Tsunami Management Area Qualifying Matter to only apply to residential intensification and risk to life, rather than property.
 - c. Seeks Rule 5.4A be redrafted to provide for:
 - o permitted activities where it does not involve residential development
 - d. Seeks to be directly engaged on upcoming release of Plan Change 12 on Coastal Hazards for implications on WWB's site.

STATEMENT OF INTEREST AND BACKGROUND

- Winstone Wallboards Limited (WWB) is New Zealand's only manufacturer and largest marketer of gypsum plasterboard, drywall systems, associated GIB products and services. WWB has multiple locations throughout New Zealand, including the Christchurch manufacturing and distribution centre at 219 Opawa Road, Christchurch.
 - Existing and Future Use of the site for Industrial Purposes
- The WWB Opawa Road site (219 Opawa Road) was lawfully established and has operated at this location for over 50 years, operating 24 hours a day, 7 days a week for the purposes of manufacturing and despatch to manufacturing warehouses for the distribution of gypsum plasterboard, drywall systems and associated GIB products.
- The site is located in the Industrial Heavy Zone and currently operates under resource consents for trade waste, discharge to air and location compliance certificate.
- The site is located on the eastern side of Opawa Road, with the majority of the site covered by the *Tsunami Management Area Qualifying Matter Overlay*. (refer **Figure 1** below)

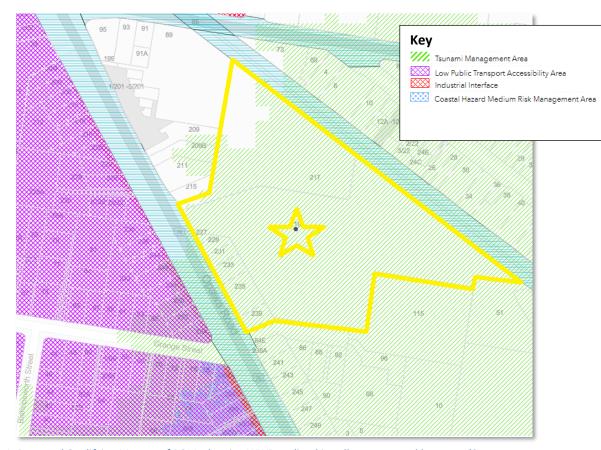


Figure 1: Proposed Qualifying Matters of PC14, showing WWB outlined in yellow annotated by a star. (Source: PC14 Map, annotated by steplanning)

GENERAL SUBMISSION

Key aims of the submission

10 Given the housing crisis in New Zealand, the continued supply of building materials is of utmost relevance and importance to WWB as New Zealand's only manufacturer and largest marketer of gypsum plasterboard, drywall systems, associated GIB products and services.

- The principal aim of this submission is therefore to ensure the continued operation of WWB Christchurch site, now and in the future. This will ensure the continued supply of building materials to support residential intensification by establishing the most appropriate provisions to achieve that goal and assist the Council in implementing relevant direction from higher order statutory instruments particularly the National Policy Statement on Urban Development 2020 (NPS-UD).
- 12 WWB also seeks amendments to the notified provisions in PC14 to better implement the requirements of Schedule 3A of the Resource Management Act 1991 (RMA)¹. These are detailed in Appendix B.

SPECIFIC SUBMISSION IN RELATION TO THE REGULATORY CONTEXT National Policy Statement on Urban Development

- The National Policy Statement on Urban Development (NPS UD) directs that local authority decisions on urban development are to be integrated with infrastructure planning decisions,² and that planning decisions contribute to well-functioning urban environments.³
- 14 A well-functioning urban environment is one in which:

"enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future"

15 WWB's Opawa Road operation provides building materials to ensure that people and communities can construct residential dwellings now and, in the future, and therefore their continued operation contributes to a well-functioning urban environment and therefore implements Objective 1 of the NPS UD.

Resource Management (Enabling Housing Supply and Other Matters Amendment Act 2021) – Application of Qualifying Matter Provisions

- The Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (Enabling Housing Act) was introduced to speed up implementation of the NPS UD, whereby Councils were required to incorporate Medium Density Residential Standards (MDRS) into every relevant residential zone by 20 August 2022 provided that the MDRS should be less enabling of development where a qualifying matter applies.⁵
- The Enabling Act specifically provides for qualifying matters and recognises that there will be circumstances where the development potential of MDRS cannot and ought not to be realised to its fullest extent. This is true for the areas where residential zoning adjoins industrial zoning, such as the areas to the eastern side of Opawa Street and WWB considers that proposed Industrial Interface Quality Matter is entirely appropriate in managing reverse sensitivity matters. Furthermore, the Low Public Transport Accessibility Qualifying Matters provide for intensification that commensurate with public transport services and demonstrate Council's sound planning practice, which WWB also considers aligns with the intention of the Enabling Act and supports the intent of this Qualifying Matter.

¹ Schedule 3A of the RMA, inserted on 21 December 2021, to implement the Enable Housing Supply and Other Matters Amendment Act 2021.

² Objective 6 NPS UD

³ Policy 1 NPS UD

⁴ Objective 1 NPS UD

⁵ Resource Management Act 1991 (*RMA*) 77G(1), s 80F(1)(a).

- However, the Tsunami Management Area Qualifying Matter mapping and associated provisions appear to go beyond the scope of managing the effects of development potential of MDRS as currently drafted, they apply to all development, in all zones, rather than being limited to MDRS in residential zones, which is the purpose of a qualifying matter.
- 19 The way in which the current Tsunami Management Area Qualifying Matters are drafted and applied have the potential to extinguish the underlying Industrial Heaving zoning provisions that relate to WWB's Opawa Road site.
- The consequences of the proposed overlay and provisions could lead to WWB's operation being limited in the future if the underlying zoning provisions are overridden by the Tsunami Management Area Qualifying Matters, in turn, reducing the overall production of building products. Therefore, the provisions as currently drafted would not provide for the overall outcome of delivering Enabling Housing Act.
- We consider that most prudent way to ensure this unintended outcome does not occur, is to provide for permitted activity status for activities within the Tsunami Management Area Qualifying Matters where it does not involve residential development. The associated policies and objectives would therefore need to be amended to reflect and align with the overall intent of providing for permitted activities within the Tsunami Management Area Qualifying Matters Overlay.

Tsunami Quality Matter Mapping Extent

- The s32 Report states that "The tsunami qualifying matter is based off the 2019 NIWA 1 in 500 year tsunami event with 1.6m sea level rise by 2120. The depth, velocity and debris in a tsunami can result in significant risk to life and damage to property." 6
- However, there is no assessment within the s32 report that qualifies whether this level of mapping is appropriate, and the parameters used to create the mapping in terms of limiting development or whether is more appropriately used for evacuation purposes. WWB questions whether the intent of NIWA's mapping was for development restriction or civil defence management purposes.
- Furthermore, the extent of the Tsunami Management Area mapping overlay appears to be largely pixelated (refer **Figure 1** above) and what is not clear if any buffering has been used to create the overlay map and how this overlay map corresponds to NIWA's three different levels evacuation zones.
- WWB considers the use of Tsunami risk mapping is entirely appropriate to be used for civil defence evacuation purposes, however, if such mapping is to be used to limit development, then the parameters of the mapping need to be transparent, and all mapping options assessed to ensure the most appropriate mapping extent it used. Overall, WWB considers that Tsunami risk management is best managed through civil defence emergency management warning systems and evacuation procedures.

Upcoming Coastal Hazards Plan Change

Council intends to publicly notify Plan Change 12: Coastal Hazards (**PC12**) later this year. As Tsunami is interlinked with the 'suite' of Coastal Hazards, such as coastal inundation, coastal erosion etc it is considered that any proposed mapping or provisions that are proposed for **PC12** could have consequences on the Tsunami Management Area. WWB considers that

⁶ S32 Report – Qualifying Matters, Part 2, page 121, dated

Tsunami hazard would have ideally considered at the same time as all other Coastal Hazards rather than in isolation.

To ensure that the proposed Plan Change 12 does not have any consequences for WWB site, WWB seeks that they be directly consulted on this upcoming plan change.

SUMMARY OF RELIEF SOUGHT

In summary, WWB seeks to ensure that the existing permitted activity rights the Opawa Road site which are provided for under the existing Industrial Heavy Zone are retained by the following:

WWB seeks:

- a. **Clarification** on the appropriateness and full disclosure of the parameters in creating the *Tsunami Management Area Qualifying Matter* mapping overlay for planning purposes.
- b. **Amendment** to Policy 5.2.2.5.2 to clarify the intent of the Tsunami Management Area Qualifying Matter only applying to residential intensification and risk to life, rather than property
- c. Amendment to Rule 5.4A be redrafted to provide for:
 - o permitted activities where it does not involve residential development
- d. **Directly engaged** on upcoming release of Plan Change 12 on Coastal Hazards for implications on WWB's site.

CONCLUSION

- 29. For reasons set out in this submission, WWB considers amendments to Proposed PC14 are required to ensure that the continued supply of building material needed to support the residential intensification in Christchurch and New Zealand and deliver the intent of Schedule 3A of the Resource Management Act 1991. **Appendix B** outlines WWB requested relief in full.
- 30. As currently drafted, the Tsunami Qualifying Matter mapping and associated provisions are not considered appropriate given they apply to all activities and all zones and therefore do not appropriate deliver the overall intent of the NPS-UD or the Enabling Act.
- 31. WWB preference is that the Tsunami Qualifying Matter only applies to residential activities within residential zones as set out in **Appendix B** as the most appropriate method of managing the effect to life of Tsunami Risk.

APPENDIX B

Proposed Plan Change 14: Housing and Business Choice 2023 – Detailed Relief

Submitter Name: Winstone Wallboards Ltd

Chapter / Sub-part	Specific provision / matter	Position	Reason for submission	Decisions requested / relief sought
Tsunami Management Overlay Map Extent – Qualifying Matter	Mapping extent	Oppose	WWB considers that further assessment and transparency of the mapping extent needs to be provided to ensure that the area identified as Tsunami risk is the most appropriate for managing development or whether it is best utilised for civil defence emergency management.	Further assessment required on the Tsunami Management Overlay mapping.
Chapter 5 – Natural Hazards	5.2.2.5.2 Policy - Managing development within Qualifying Matter Tsunami Management Area	Oppose	WWB considers that this policy should only apply to residential development within residential zones to align with the purpose of qualifying matters under the NPS-UD. WWB also considers that risk to property is too high threshold and the focus should remain on risk to life. Overall WWB considers that Tsunami risk is best managed through Civil Defence Emergency Management warning systems.	Amend Policy 5.2.2.5.2: Within the Tsunami Management Area Qualifying Matter, avoid development, subdivision and land use that would provide for intensification of any site for residential purposes in residential zones, unless the risk to life and property is acceptable.
Chapter 5 – Natural Hazards	5.4A Rules – Qualifying Matter Coastal Hazard Management Areas and Qualifying Matter Tsunami Management Area	Oppose	If the proposed Tsunami Management Area Qualifying Matter overlay is adopted, the rules should only apply to those relating to residential activities within the residential zone to ensure that industrial activities within the Industrial Heavy Zone, such as WWB's Opawa Road site are not unduly affected and have the unintended consequence of extinguishing permitted activity status of the underlying zone.	Amend: Rule 5.4A.1 5.4A.1 Permitted activities a. There are no permitted activities. Non-residential activities.
Upcoming Plan Change 12: Coastal Hazards		Neutral		Seeks to be directly engaged on upcoming release of Plan Change 12 on Coastal Hazards for implications on WWB's site.



Submitter Details

Submission Date: 03/05/2023

First name: David Last name: Gibbons

Prefered method of contact Email

Consultation Document Submissions

Provision: Chapter 6 General Rules and Procedures

Seek Amendment

I seek the following decision from the Council

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

My submission is that:

I am writing in support of a recent submission from Bruce and Diana Taylor Reference 50982

Our family, including three daughters, live within 200m of Bruce and Diana at 50 Heaton Street.

Whilst not directly affected by the proposed plan change (due to the fact our home is immediately behind the proposed Special Amenity/ Character Area 11 – Heaton/Circuit) a number of concerns flagged in the Taylor's submission will negatively impact both the amenity value and safety of the local community.

Of particular concern are the potential safety issues caused by the lack of on-site parking and significantly increased traffic if multi-unit dwellings (up to 32 metres) were constructed in the area.

I understand the Council's need to adequately respond to Central Government's housing intensification rules and Council's desire to concentrate high density housing around main shopping areas, public transport and with 1.2km of the city centre.

However, the development of up to a 10 storey (32 metre) multi-unit building <u>within 10m</u> of the Elmwood Normal Primary School is simply unacceptable.

Elmwood Normal School sits directly opposite the Taylors property at 8 Allister Ave, proposed to be included in the HDRS, and has existed on the site since 1887

Any high density development, but particularly a 32 metre high development, on Allister Avenue or within 500m of Elmwood School on Leinster Road would materially expose the children to an unacceptable level of risk from increased traffic volumes and all-day parking particularly at peak times during drop offs and pick ups.

Our three daughters all walked, scooted or biked to both Elmwood and Heaton Street schools and I have witnessed first-hand the significant risks that increased traffic and road parking have had at various times of their schooling.

The reduced visibility and obstruction caused by dozens of cars clogging up this already congested area is an unacceptable risk for the community and should not be tolerated.



Submitter Details

Submission Date: 03/05/2023

First name: David Last name: Lang

Prefered method of contact Email

Consultation Document Submissions

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:

Keep maximum heights in the Central City as they are

My submission is that:

The increase in maximum height of residential buildings in the central city is unnecessary and contrary to the recovery plan following the earthquakes. Intensifying by increasing the height is a solution for geographically constrained cities such as Auckland and Wellington, but is not necessary in Christchurch. There is no shortage of land that could be developed, so this change is not required and works against the development of the city as an attractive, human-scaled, low-rise city. It is what makes Christchurch an attractive destination for inwards migration



Submitter Details

Submission Date: 03/05/2023

First name: Jorge Last name: Rodriguez

Prefered method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Seek Amendment

I seek the following decision from the Council

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

I strongly oppose the proposed zoning of 5B Frome Place as a Residential Suburban Zone and urge the Christchurch City Council to rezone the property and the St Albans area in general as a Residential Medium Density Zone. Doing so would align with the principles of the NPSUD and increase the availability of affordable and sustainable housing options in Christchurch. Furthermore, I request that the claim that the St Albans area is a Low Public Accessibility Area be re-evaluated based on the actual accessibility and proximity to public amenities.

My submission is that:

I am writing to express my opposition to the proposed Christchurch PC14, specifically in regards to the proposed zoning of 5B Frome Place. I strongly believe that the proposed zoning is contrary to Policy 3 of the National Policy Statement on Urban Development (NPSUD), and that the property should be zoned as a Residential Medium Density Zone as opposed to a Residential Suburban Zone. I believe that the claim that the property is a Low Public Accessibility Area is unfounded.

Firstly, I would like to address the fact that the proposed zoning of 5B Frome Place as a Residential Suburban Zone is not in alignment with Policy 3 of the NPSUD. This policy encourages medium-density development in urban areas, which can lead to better urban design outcomes, reduced reliance on cars, and more efficient use of existing infrastructure. Zoning the property as a Residential Medium Density Zone would allow for more efficient land use and increased housing options that align with the principles of the NPSUD.

Zoning the St Albans area as a Residential Suburban Zone would limit the potential for development of the area and could result in a lack of affordable and sustainable housing options. This is not in alignment with the principles of the NPSUD, which aims to increase the availability of affordable housing in urban areas.

Secondly, the claim that the St Albans area is a Low Public Accessibility Area is not supported by the facts nor by the extent of the Qualifying Matter in Figure 6.32.1 in the S32 report. Id does not seem that applying is not supported by any evidence. The area is accessible by vehicle and foot and cycle lanes and is located in a desirable neighborhood with easy access to shops, schools, and other amenities. Additionally, the area is located in close proximity to public transportation options, further negating the claim that it is a Low Public Accessibility Area.

In conclusion, I strongly oppose the proposed zoning of 5B Frome Place as a Residential Suburban Zone and urge the Christchurch City Council to rezone the property as a Residential Medium Density Zone. Doing so would align with the principles of the NPSUD and increase the availability of affordable and sustainable housing options in Christchurch. Furthermore, I request that the claim that the St Albans area is a Low Public Accessibility Area be re-evaluated based on the actual accessibility and proximity to public amenities.



Submitter Details

Submission Date: 03/05/2023

First name: Sean Last name: Walsh

Prefered method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Oppose

I seek the following decision from the Council

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

I ask that our area and House should be a suburban charter area/street And Ask that resource consent should be required before any development can proceed

My submission is that:

I ask that our area and House should be a suburban charter area/street And Ask that resource consent should be required before any development can proceed

Provision: Chapter 14 Residential

Oppose

I seek the following decision from the Council

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

I ask that our area and House should be a suburban charter area/street And Ask that resource consent should be required before any development can proceed

My submission is that:

I ask that our area and House should be a suburban charter area/street And Ask that resource consent should be required before any development can proceed



Submitter Details

Submission Date: 03/05/2023

First name: Josiah Last name: Beach

Prefered method of contact Email

Consultation Document Submissions

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:

I appreciate that the Council is doing everything within its power to limit the storey limits and housing density increases, given the stringent legislation from central government.

I fully and completely support all the Qualifying Matters proposed by the Council, and am grateful for the proactive and well-considered issues that they deal with.

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:

I appreciate that the Council is doing everything within its power to limit the storey limits and housing density increases, given the stringent legislation from central government.

I fully and completely support all the Qualifying Matters proposed by the Council, and am grateful for the proactive and well-considered issues that they deal with.

I also appreciate and support the special attention given by the Council to overshadowing in the Qualifying Matter. Sunlight Access Qualifying Matter.

I fully support the Significant and other Trees Qualifying Matter.

I fully support the Residential Character Area Qualifying Matter

I fully support the proposed tree canopy requirement mechanism.

I fully support the proposed Areas with Low Public Transport Availability Qualifying Matter.

Thank you for the effort that has gone into this.

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:

I appreciate that the Council is doing everything within its power to limit the storey limits and housing density increases, given the stringent legislation from central government.

I fully and completely support all the Qualifying Matters proposed by the Council, and am grateful for the proactive and well-considered issues that they deal with.

I fully support the proposed Areas with Low Public Transport Availability Qualifying Matter.

Thank you for the effort that has gone into this.

Provision: Chapter 8 Subdivision, Development and Earthworks

Support

I seek the following decision from the Council

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

My submission is that:

I appreciate that the Council is doing everything within its power to limit the storey limits and housing density increases, given the stringent legislation from central government.

I fully and completely support all the Qualifying Matters proposed by the Council, and am grateful for the proactive and well-considered issues that they deal with.

I also appreciate and support the special attention given by the Council to overshadowing in the Qualifying Matter. Sunlight Access Qualifying Matter.

I fully support the Significant and other Trees Qualifying Matter.

I fully support the Residential Character Area Qualifying Matter

I fully support the proposed tree canopy requirement mechanism.

Thank you for the effort that has gone into this.

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:

My submission is that:

I appreciate that the Council is doing everything within its power to limit the storey limits and housing density increases, given the stringent legislation from central government.

I fully and completely support all the Qualifying Matters proposed by the Council, and am grateful for the proactive and well-considered issues that they deal with.

I also appreciate and support the special attention given by the Council to overshadowing in the Qualifying Matter. Sunlight Access Qualifying Matter.

I fully support the Significant and other Trees Qualifying Matter.

I fully support the Residential Character Area Qualifying Matter

I fully support the proposed tree canopy requirement mechanism.

Thank you for the effort that has gone into this.

Provision: Chapter 10 Designations and Heritage Orders

Support

I seek the following decision from the Council

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

My submission is that:

I appreciate that the Council is doing everything within its power to limit the storey limits and housing density increases, given the stringent legislation from central government.

I fully and completely support all the Qualifying Matters proposed by the Council, and am grateful for the proactive and well-considered issues that they deal with.

I also appreciate and support the special attention given by the Council to overshadowing in the Qualifying Matter. Sunlight Access Qualifying Matter.

I fully support the Significant and other Trees Qualifying Matter.

I fully support the Residential Character Area Qualifying Matter

I fully support the proposed tree canopy requirement mechanism.

Thank you for the effort that has gone into this.



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Submission Date: 03/05/2023

First name: Jill Last name: Young

Prefered method of contact Email

Consultation Document Submissions

Provision: Planning Maps

Oppose

I seek the following decision from the Council

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

Change the zoning on Brodie Street, Ilam and its surrounds to RS (Residential Suburban Zone) and retain the current planning rules.

My submission is that:

Oppose zoning of MRZ (Medium Density Residential Zone) on Brodie Street, Ilam and its surrounds (including the associated 12m building height, 3 units and 1m setback).

The reason for opposing are:

- 1. Adverse environmental effects on residential amenity, including:
- reduced sunlight
- reduced privacy
- reduced residential character including space and trees.
- increased noise from closer and denser living, including traffic.
- reduced overall amenity and residential suburban enjoyment for existing dwellings that could become surrounded by the higher, closer and denser buildings.
- increased traffic and parking congestion and safety concerns on Brodie Street exacerbating an already congested area. One side of the street is currently used by student parking for Villa Maria College and Brodie Street becomes one lane and gets congested. Current insufficient on street parking for residents or visitors. Large amount of traffic that currently uses Brodie Street.
- 2. Adverse environmental effects on local Infrastructure
- insufficient parking and road capacity for cars and traffic that would be generated by increased residential development. Safety issues.
- increased pressure on storm water, sewerage and water systems.



Submitter Details

Submission Date: 03/05/2023

First name: Rosanne Last name: Hawarden

Prefered method of contact

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: Jane Deans Close, Riccarton.

My submission is that:

I oppose the change to the current zoning of suburban residential transitional zoning around Jane Deans Close, Riccarton. I also request an amendment that would include Jane Deans Close as a Residential Heritage Area due to the War Memorial in the Close. The current zoning suits this area of Riccarton very well and has resulted in pleasant family orientated dwellings with adequate gardens and community facilities suited to it. By changing the zoning to high density the character of the suburb will be lost, schools and communities will suffer, markets will change and families move away. Purveyors of addictive substances are already moving into the area, which the residents have actively attempted to stop. The ribbon development along Riccarton Road is more than adequate with plentiful shops and restaurants around the hub of the Westfield Mall further away. In addition Jane Deans Close has a heritage war memorial to the 20th Battalion in it, which unites this community. Having 6 storey buildings springing up around the area will destroy the respectful tone of the street which currently has a status as one of the most beautiful cul de sacs in Christchurch. So much was lost with the earthquakes, why destroy what is left?

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: Jane Deans Close, Riccarton

My submission is that:

I oppose the change to the current zoning of suburban residential transitional zoning around Jane Deans Close. I also request an amendment that would include Jane Deans Close as a Residential Heritage Area due to the War Memorial to the 20th Battalion in the Close. The current zoning suits this area of Riccarton very well and has resulted in pleasant family orientated dwellings with adequate gardens and community facilities suited to it. By changing the zoning to high density the character of the suburb will be lost, schools and communities will suffer, markets will change and families move away. Purveyors of addictive substances are already moving into the area, which the residents have actively attempted to stop. The ribbon development along Riccarton Road

is more than adequate with plentiful shops and restaurants around the hub of the Westfield Mall further away. In addition Jane Deans Close has a heritage war memorial to the 20th Battalion in it, which unites this community. Having 6 storey buildings springing up around the area will destroy the respectful tone of the street which currently has a status as one of the most beautiful cul de sacs in Christchurch. So much was lost with the earthquakes, why destroy what is left?



Submitter Details

Submission Date: 03/05/2023

First name: Brooke Last name: McKenzie

Prefered method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Seek Amendment

I seek the following decision from the Council

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

The safe TC1 land, cost effectively developed for housing to the east of the city protected currently by (and under expert panel and Ecan Review) the airport contours must be immediately directed for release to cater for the housing desired by many, having a plot of land and not closed in by neighbors in high rise apartment developments even if so desired by some deluded city planners. On the fringe of the new zoning there should be a band of land which can only be developed into half to one acre plots to cater for a definate demand and create a soft city fringe and not an intensive buffer between hard edged city and airport. The 50 db contour is to go and be put out to 55dbn (as per nz6805) with 55-57dbn the soft fringe. The landowners group of 160 landowners affected by the airport contours will, if contours are not at least standardised to every other airport in NZ, will take action.

My submission is that:

houses will have to be built within christchurch city boundaries within the next 30 years. Since the earthquakes we have lost an incredible number of ratepayers to selwyn and Waimak because of very unwise decisions by council and the minister using the LURP act to rezone land in the Halswell area which apart from being very expensive to develop, was totally unsuitable and has led to storm water problems semi rectified by swales and other flood diversion actions. The expensive development costs of subsequent sections and builds led many homeowners outside christchurch to buy equivalent or better for substantially less with change. The Halswell land continues to be developed on a flood plateau that is the catchment tributary for the heathcote and Avon rivers. With climate change the insanity of the ministers decision will be rewarded with continuous flooding. Still

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:

The safe TC1 land, cost effectively developed for housing to the east of the city protected currently by (and under expert panel and Ecan Review) the airport contours must be immediately directed for release to cater for the housing desired by many, having a plot of land and not closed in by neighbors in high rise apartment developments even if so desired by some deluded city planners. On the fringe of the new zoning there should be a band of land which can only be developed into half to one acre plots to cater for a definate demand and create a soft city fringe and not an intensive buffer between hard edged city and airport. The 50 db contour is to go and be put out to 55dbn (as per nz6805) with 55-57dbn the soft fringe. The landowners group of 160 landowners affected by the airport contours will, if contours are not at least standardised to every other airport in NZ, will take action.

My submission is that:

Houses will have to be built within christchurch city boundaries within the next 30 years. Since the earthquakes we have lost an incredible number of ratepayers to selwyn and Waimak because of very unwise decisions by council and the minister using the LURP act to rezone land in the Halswell area which apart from being very expensive to develop, was totally unsuitable and has led to storm water problems

semi rectified by swales and other flood diversion actions. The expensive development costs of subsequent sections and builds led many homeowners outside christchurch to buy equivalent or better for substantially less with change.. The Halswell land continues to be developed on a flood plateau that is the catchment tributary for the heathcote and Avon rivers. With climate change the insanity of the ministers decision will be rewarded with continuous flooding.



Submitter Details

Submission Date: 03/05/2023

First name: Brooke Last name: McKenzie

Prefered method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Seek Amendment

I seek the following decision from the Council

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

My submission is that:

The specific provisions of the plan change that my submission relates to are:: Subdivision, Development and Earthworks, Specific Purposes Zone, Chapter 14 - Residential, Open Space, All, Other

My submission is that: houses will have to be built within christchurch city boundaries within the next 30 years. Since the earthquakes we have lost an incredible number of ratepayers to selwyn and Waimak because of very unwise decisions by council and the minister using the LURP act to rezone land in the Halswell area which apart from being very expensive to develop, was totally unsuitable and has led to storm water problems semi rectified by swales and other flood diversion actions. The expensive development costs of subsequent sections and builds led many homeowners outside christchurch to buy equivalent or better for substantially less with change.. The Halswell land continues to be developed on a flood plateau that is the catchment tributary for the heathcote and Avon rivers. With climate change the insanity of the ministers decision will be rewarded with continuous flooding. Still

I seek the following decision from the Council: The safe TC1 land, cost effectively developed for housing to the east of the city protected currently by (and under expert panel and Ecan Review) the airport contours must be immediately directed for release to cater for the housing desired by many, having a plot of land and not closed in by neighbors in high rise apartment developments even if so desired by some deluded city planners. On the fringe of the new zoning there should be a band of land which can only be developed into half to one acre plots to cater for a definate demand and create a soft city fringe and not an intensive buffer between hard edged city and airport. The 50 db contour is to go and be put out to 55dbn (as per nz6805) with 55-57dbn the soft fringe. The landowners group of 160 landowners affected by the airport contours will, if contours are not at least standardised to every other airport in NZ, will take action.

I am seeking that Council make changes to a specific site or sites : Yes

Please provide the address or area: there should be

Do you wish to speak at the hearing in support of your submission?: I wish to speak

If others make a similar submission, would you consider presenting a joint case at the hearing?: No



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Submission Date: 03/05/2023

First name: Brooke Last name: McKenzie

Prefered method of contact Email

Consultation Document Submissions

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:

The safe TC1 land commencing at 54 dbn and ceasing at 57dbn inclusive be determined as a low density SOFT FRINGE BUFFER ZONE to future protect the city from intensification infringement and airport from further OCB extension. This SOFT FRINGE to include all suitable land within the Christchurch City boundaries with approval for subdivision into a minimum of 1 acre plots.

I further seek a decision from the council that it be recognised that there are many and <u>varied operations that by merit</u> should determine they are suitable within contours inside and outside what is decided the OCB for SOFT FRINGE.

My submission is that:

See the detailed submission.

Attached Documents

Name
Brooke Mckenzie

Submitted Date: Attachments: No

Age: 65 - 79 years

Gender: Male

NZ European

If yes, are you directly affected by an effect of the proposed plan change/part that adversely affects the environment, and does not relate to the trade competition or the effects of trade competition?:

Not applicable

The specific provisions of the plan change that my submission relates to are:: Subdivision, Development and Specific Purposes Zone, Chapter 14 - Residential, Open Space, All, Other

My submission is that:

Christchurch desperately needs a large increase in ratepayer numbers to support the infrastructure and enhancement developments (i.e. Stadium) to spread the rate burden over a wider ratepayer catchment so to hold annual rate increases to an acceptable level. Unless this increased catchment is realised rate increases will reach a point of unaffordability for current (plus %over time) ratepayers. The 38% projected rate increase over the next 5 years is unacceptable. If the ratepayer base is not increased then projected council development will have to be curtailed, time line extended or covered by borrowing which the 17% current debt servicing will blow out and eventually have the same end result of containment in future budgets.

50000 houses will have to be built within <u>Christchurch city boundaries</u> within the next 30 years. Since the earthquakes we have lost an incredible number of ratepayers to Selwyn and Waimak because of very unwise decisions by council and the minister using the LURP act to rezone land in the Halswell area which apart from being very expensive TC2 and 3 to develop, was totally unsuitable and has led to storm water problems semi rectified by swales and other flood diversion actions. The expensive development costs of subsequent sections and builds led many homeowners to venture outside Christchurch to buy equivalent or better for substantially less \$, with change. These unwise decisions

made to protect airport contours have cost this city dearly. The Halswell land continues to be developed on a flood plateau that is the catchment tributary for the Heathcote and Avon rivers. With climate change and the insanity of the council and minister's decision will be rewarded with continuous flooding. Still subdivisions get approved into these totally unsuitable areas because there are currently few alternatives.

This city needs land for subdivision and it has been widely agreed for 30 plus years that the most suitable TC1 land has been the western fringe out to the airport. There has never been any argument about this fact. The impediment has been protection of the airport and the powers that be persuaded that an outer control boundary (OCB) of 50dbn was the limit for residential and other development. This was determined by a very persuasive airport company and their consultants that development within this band was detrimental to health and may lead to the airport being curfewed. No one wants the airport to be curfewed and the remedy proposed will ensure their protection. However every other airport in New Zealand including Auckland (UNCURFEWED) has accepted the 1992 standard NZ6805 with an OCB of 55dbn.

The Government has recently instructed new rules for intensification of housing. This in effect is offering one type of development in apartment type buildings. The way Christchurch has fought back and determined such development to certain areas is in my opinion the correct one. However on saying that the determination to force people into such accommodation is wrong. This after all is the Garden City. We require, and will continue to require, a diverse range of housing types. Small to larger apartments will suit a sector of the homeowner but others with families will continue to want the "quarter acres section" whilst the small holdings of 1-10 acres will always be in demand. That is what diversity means and people must always have a choice to suit their circumstances and desires. Forcing people into one type of accommodation may well back fire.

There is currently a review underway by an international expert panel to determine the Air Noise Contours that have protected the airport from encroaching development for many years at 50dbn OCB which is the

lowest in the world. ECAN will have most probably received the final REPORT by the time PC14 is heard by Council. This report will only confirm the position of the new contours. However where they fall is not the point. The contours will simply show lines on a map and are only relevant to a decision that ECAN alone will make regarding the OCB Christchurch city will be subject to in the future. Everyone is on the same page when it comes to the fact that the OCB of 50dbn was never reasonable and that to supply the cities future requirements NZ6805 at 55 OCB will be the minimum and sensibly 57dbn inclusive.

At the same time we have a fine international airport now under management who appear to be more receptive to change and prepared to adapt. At the same time protection of such an asset is, in my opinion, desirable. In 30 years having a solid wall of houses out to the 55dbn inclusive OCB will then put pressure on to go to 60dbn OCB which even these days is very common around similar airports. The solution is in fact very simple and can be implemented under PC14 and protect both the airport and the city once the development reaches the OCB. The airport needs a buffer zone between higher density housing by creating a SOFT FRINGE of lower density housing made up of 1 acre lots creating a protective band around the airport which will stop long term future conflict. For example a 10 acre block split into 8 sections would have a single water supply and sewage disposal placed strategically to eventually link into the city system when such infrastructure reaches such developments. The fact is that such large land parcels will attract substantial homes and be extremely well treed and landscaped well before more intensive development reaches the boundary. This soft fringe buffer zone should commence at 54 and cease at 57 inclusive. Many landowners on current 10 acre blocks in this SOFT FRINGE will have no intentions of splitting their land thus maintaining desirability of close in lifestyle blocks. There's one point that's relevant. We live in a world of noise. Inner city, main city roads, motorways, in our cars and in our houses at much higher NOISE levels than close proximity to our airport. With diversity of development people have a choice and know the advantages and disadvantages pertaining to their decision. That choice is lost if councils elect to restrict variation.

I seek the following decision from the Council: The safe TC1 land commencing at 54 dbn and ceasing at 57dbn inclusive be determined as a low density SOFT FRINGE BUFFER ZONE to future protect the city from intensification infringement and airport from further OCB extension. This SOFT FRINGE to include all suitable land within the Christchurch City boundaries with approval for subdivision into a minimum of 1 acre plots.

I further seek a decision from the council that it be recognised that there are many and <u>varied operations that by merit</u> should determine they are suitable within contours inside and outside what is decided the OCB for SOFT FRINGE.

I am seeking that Council make changes to a specific site or sites: Approving 1 acre lots 54 to 57dbn to be established on all suitable land within the Christchurch Boundaries.

Please provide the address or area:

Do you wish to speak at the hearing in support of your submission?: I wish to speak to support my submission.

If others make a similar submission, would you consider presenting a joint case at the hearing?: No

First name: Brooke

Last name: McKenzie

Email: b.mckenzie@xtra.co.nz

Phone: 0212 307090

Address: 602 Yaldhurst Road

Suburb: Yaldhurst

CityTown: Christchurch

Postcode: 7676

Submitted Date: Attachments: No

Age: 65 - 79 years

Gender: Male

NZ European

If yes, are you directly affected by an effect of the proposed plan change/part that adversely affects the environment, and does not relate to the trade competition or the effects of trade competition?:

Not applicable

The specific provisions of the plan change that my submission relates to are:: Subdivision, Development and Specific Purposes Zone, Chapter 14 - Residential, Open Space, All, Other

My submission is that:

Christchurch desperately needs a large increase in ratepayer numbers to support the infrastructure and enhancement developments (i.e. Stadium) to spread the rate burden over a wider ratepayer catchment so to hold annual rate increases to an acceptable level. Unless this increased catchment is realised rate increases will reach a point of unaffordability for current (plus %over time) ratepayers. The 38% projected rate increase over the next 5 years is unacceptable. If the ratepayer base is not increased then projected council development will have to be curtailed, time line extended or covered by borrowing which the 17% current debt servicing will blow out and eventually have the same end result of containment in future budgets.

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lowest in the world. ECAN will have most probably received the final REPORT by the time PC14 is heard by Council. This report will only confirm the position of the new contours. However where they fall is not the point. The contours will simply show lines on a map and are only relevant to a decision that ECAN alone will make regarding the OCB Christchurch city will be subject to in the future. Everyone is on the same page when it comes to the fact that the OCB of 50dbn was never reasonable and that to supply the cities future requirements NZ6805 at 55 OCB will be the minimum and sensibly 57dbn inclusive.

At the same time we have a fine international airport now under management who appear to be more receptive to change and prepared to adapt. At the same time protection of such an asset is, in my opinion, desirable. In 30 years having a solid wall of houses out to the 55dbn inclusive OCB will then put pressure on to go to 60dbn OCB which even these days is very common around similar airports. The solution is in fact very simple and can be implemented under PC14 and protect both the airport and the city once the development reaches the OCB. The airport needs a buffer zone between higher density housing by creating a SOFT FRINGE of lower density housing made up of 1 acre lots creating a protective band around the airport which will stop long term future conflict. For example a 10 acre block split into 8 sections would have a single water supply and sewage disposal placed strategically to eventually link into the city system when such infrastructure reaches such developments. The fact is that such large land parcels will attract substantial homes and be extremely well treed and landscaped well before more intensive development reaches the boundary. This soft fringe buffer zone should commence at 54 and cease at 57 inclusive. Many landowners on current 10 acre blocks in this SOFT FRINGE will have no intentions of splitting their land thus maintaining desirability of close in lifestyle blocks. There's one point that's relevant. We live in a world of noise. Inner city, main city roads, motorways, in our cars and in our houses at much higher NOISE levels than close proximity to our airport. With diversity of development people have a choice and know the advantages and disadvantages pertaining to their decision. That choice is lost if councils elect to restrict variation.

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I further seek a decision from the council that it be recognised that there are many and <u>varied operations that by merit</u> should determine they are suitable within contours inside and outside what is decided the OCB for SOFT FRINGE.

I am seeking that Council make changes to a specific site or sites: Approving 1 acre lots 54 to 57dbn to be established on all suitable land within the Christchurch Boundaries.

Please provide the address or area:

Do you wish to speak at the hearing in support of your submission?: I wish to speak to support my submission.

If others make a similar submission, would you consider presenting a joint case at the hearing?: No

First name: Brooke

Last name: McKenzie

Email: b.mckenzie@xtra.co.nz

Phone: 0212 307090

Address: 602 Yaldhurst Road

Suburb: Yaldhurst

CityTown: Christchurch

Postcode: 7676

Christchurch City Council

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details

Submission Date: 03/05/2023

First name: Caroline Last name: Hutchinson

Organisation: Stantec

On behalf of: University of Canterbury

Prefered method of contact Email

Attached Documents

Name

20230502_Submission on PC14_University of Canterbury

Stantec New Zealand

Level 2, 2 Hazeldean Road Addington Christchurch 8024 NEW ZEALAND Mail to: PO Box 13052, Christchurch 8141



May 3, 2023

Submission on notified Plan Change 14 to the Christchurch District Plan

To: Christchurch City Council

Name of the Submitter: Te Whare Wānanga o Waitaha | University of Canterbury

Address for Service: C/- Stantec NZ

PO Box 13052 Armagh

Christchurch 8141

Att: Kelly Bombay

Email: kelly.bombay@stantec.com

This is a submission on the Housing and Business Choice Plan Change (PC14) to the Christchurch District Plan on behalf of Te Whare Wānanga o Waitaha – University of Canterbury (the University). PC14 was notified by Christchurch City Council on 17 March 2023.

This submission relates to the provisions in PC14 for residential development.

The University could not gain an advantage in trade competition through this submission.

1. The Submitter (Background)

The University as of March 2021 enrolled 21,361 students and employed about 5,300 people (about 2,000 full time equivalent staff). It is ranked in the top 5% of universities in the world and is the third largest employer in Canterbury. The University is a destination location for many City residents daily and has a strong presence in the local community in terms of the immediate physical and built environment.

The University is cognisant of the role it plays in the immediate and surrounding community, particularly regarding its built form and garden like campus. Generous open space connects most of the campus boundaries with the bordering streets and enhances and contributes to the amenity of the adjoining residential environment. The University want to build and develop spaces on its campus that attract people to the institution, for work, research or study and retain a high level of amenity, character and quality in the local environment.

The University generally support enabling concentrated and more dense development to provide for much needed housing supply while recognising the need to ensure that the physical and built environment adjoining the campus retains its amenity within the community.

The University has 'environmental sustainability' as a driving strategic outcome, both in how it operates, and through supportive research. In 2021, the University developed a parking policy and plan which is influenced by its environmentally sustainable strategic goals. The plan seeks to support parking outcomes that contribute to encouraging sustainable transport modes and providing efficient and equitable parking. For example, the price of



May 3, 2023 Attention Page 2 of 3

Reference: Submission on notified Plan Change 14 to the Christchurch District Plan

on-campus parking is critical as part of an integrated parking management approach to encourage mode shift and reduce parking demand while also ensuring fair and equitable parking for students and staff. Mode shift from single-occupant vehicles to sustainable modes is an important strategy (led by Government and Council alike) to reduce emissions and address other problems associated with high levels of car usage. Increasing resident densities close to key commercial and economic nodes will assist with more active mode trips and is supported in principle.

2. Summary of Submission and Relief Sought:

The University is generally supportive of PC14 and efforts to enable more development in the city's existing urban footprint. The University considers that amendments are required to the planning framework to enable intensification, recognizing the need for housing supply, while not compromising on good design and amenity outcomes.

In particular, the University:

- Support the proposed intensification and increased scale of the built environment surrounding the
 University Campus. The proposed Medium Density Residential Zone (MDRZ) adjoins the University
 campus boundaries, excluding some residential zoning to be retained along the northern boundary of
 the Ilam Campus and Ilam Fields. Within proximity to the southern boundary of Ilam Fields, there is
 also a High Density Residential Zone (HDRZ) proposed. The University support the increase in housing
 supply in the area and therefore accommodation options for students within a walkable catchment of
 the University.
- Support the sustainable benefits of increasing the population density within this area of the city within a walkable catchment of the University for public and other active modes of transport, and commercial and social services.
- Generally support the Councils addition of 'on-site' to communal outdoor living spaces or other on-site amenity for any reduction in private outdoor living spaces. As sites get smaller, the quality of outdoor living spaces is important and with denser living often communal spaces not only contribute to usable amenity and outlook for residents but also support a sense of community. The University would like to make it clear that while the campus positively contributes to the character and amenity of the area, the grounds should not be considered as public and therefore not available to support any reduction of on-site private outdoor living area. The University note that Council is also responsible for the investment in public open space to support the higher density development which is proposed through PC14.
- Support the application of the Sunlight Access Qualifying Matter as an approach to better reflect Christchurch's specific latitude and climate.
- Generally support Subdivision Rule 8.5.1.2 C9, however with an amendment to the standard (b) which
 refers to non-compliance with density standards of the MDRZ and HDRZ. The University's
 interpretation is that there are no density standards as per Rule 14.5.2.1, yet this is not consistent with
 the Medium Density Residential Standards under Schedule 3A of the Resource Management Act
 (RMA).



May 3, 2023

Attention

Page 3 of 3

Reference: Submission on notified Plan Change 14 to the Christchurch District Plan

 Overall, generally support the efforts to enable and simplify intensification through implementing the Medium Density Residential Standards under Schedule 3A of the RMA. The University are supportive of assisting Council to identify amendments which may reduce the complexity of the consenting process.

The provisions that are supported, or supported with amendments, are set out within the table attached as **Appendix A**.

Reasons for Relief Sought

The reasons for the relief sought are set out in Appendix A. In addition to those specific reasons, the amendments sought are to ensure that PC14:

- a) will give effect to the objectives and policies of the National Policy Statement on Urban Development (NPS-UD);
- b) will contribute to well-functioning urban environments;
- is consistent with the sustainable management of physical resources and the purpose and principles of the RMA;
- d) will meet the requirements to satisfy the criteria of section 32 of the RMA;
- e) will meet the reasonably foreseeable needs of future generations; and
- f) is consistent with sound resource management practice.

Decision Sought and Hearing

The relief sought by the University is set out in **Appendix A**. In addition to that specific relief, the University seeks any other alternative or consequential changes that would give effect to the relief sought in this submission.

The University wishes to be heard in support of its submission. If others wish to make a similar submission, the University will consider presenting a joint case with them at the hearing.

Regards,

Stantec New Zealand

For and on behalf of the University of Canterbury as it's duly authorised agent.

Kelly Bombay

Principal Planner/Planning Team Lead - South

Phone: +64 3 341 4719 Kelly.Bombay@stantec.com



Appendix A: Schedule of Relief Sought

Amendments/relief sought through this submission are shown as **bold underlined**.

Sub ID	Provision under PC14	Position (Support/Oppose)	Reasons for the Submission	Relief Sought
1	Policy 14.2.1.1 a. Provide for the following distribution of different areas for residential development, in accordance with the residential zones identified and characterised in Table 14.2.1.1a, in a manner that ensures: ii. high density residential development is established in the Central City;, that achieves an average net density of at least 50 households per hectare for intensification development; iii. medium high density residential development in and near identified commercial centres is established in existing urban areas where there is ready access to a wide range of facilities, services, public transport, parks and open spaces, that achieves an average net density of at least 30 households per hectare for intensification development; iv. a mix of low and medium residential density development in greenfield neighbourhoods, that achieves a net density (averaged over the Outline development plan) of at least 15 households per hectare;	Support in part	ii. PC14 enables high density residential development to be established beyond only the Central City. This policy should be amended to reflect the proposed policy framework enabling high density residential development within the Central City as well as other identified areas (as per planning maps). iii. the University support the sustainable benefits of increasing the population density not just around the campus but near commercial centres and established urban areas supported by existing infrastructure. PC14 enables both medium and high density around these areas. By amending open spaces to the definition of 'public open space' this strengthens the policy to be clear that the open space must be public and accessible as opposed to any open space which might be private or not accessible. iv. the reference to an outline development plan and 15 households per hectare are assumed to be referring to the criteria for the Future Urban Zone (operative Residential New Neighbourhood Zone). Therefore, if this is the case, Council should amend this poilcy to refer to the Future Urban Zone.	ii. Amend as described. Amend as follows: iii. medium and high density residential development is established in and near identified commercial centres is established and/or with in existing urban areas where there is ready access to a wide range of facilities, services, public transport, parks and public open spaces. iv. Amend as described.





2	Policy 14.2.5.1	Support	The University support the intent of this policy.	Retain policy.
3	Policy 14.2.5.3 a. Residential developments of four or more residential units contribute to a high quality residential environment through site layout, building and landscape design to achieve: iv. high quality shared spaces, including communal living spaces and accessways that provide safe, direct access for pedestrians;	Support	The University support the intent of this policy. iv. Residential developments of 4 units may not need communal living spaces where sufficient private outdoor living space is provided for.	iv. high quality shared spaces, including such as communal living spaces and accessways that provide safe, direct access for pedestrians;
4	Appendix 13.7.6.1	Support	The University support MDRZ alternative zoning for the campus sites, and the adjoining residential zones to the south and east of the campus for the following reasons: - Enables complimentary scale of development on the campus to the same level of the surrounding residential area should some of the campus site be further developed for residential purposes.	Retain alternative zoning (MDRZ) of the University Campus within the Specific Purpose (Tertiary Education) Zone.
5	14.5.1.1(P1)	Support	The University support up to three residential units per site, consistent with the Medium Residential Desnity Standards (Schedule 3A of the RMA).	Retain rule.
6	14.5.2.1 1. There is no site density standard in the Residential Medium Density Residential Zone.	Support in part	This Advice Note would appear to be inconsistent with the MDRS which specifies up to three residential units per site, and Rule 14.5.1.1(P1) which specifies a maximum of three residential units per site.	Amend the standard to align with the MDRS. Consequentially, this would resolve the identified reference issue with Rule 8.5.1.2 (C9). Refer Submission ID 11 below.

7	Qualifying Matter – Sunlight Access	Support	The University support the intent of this	Retain rule.
	14.5.2.6 Height in relation to boundary		rule.	
	Appendix 14.16.2 Diagram D			
8	a. For multi-unit residential complexes and social housing complexes any development resulting in four or more residential units on a site only: ii. each residential unit shall be provided with have at least 3m² with a minimum dimension of 1.5 metres of dedicated outdoor space at ground floor level for washing lines. This space shall have a minimum dimension of 1.5 metres; and iii. the required spaces in a i and/or b ii for each residential unit shall be provided either individually, or within a dedicated shared communal space. Any communal area shall be at least the sum total of the space required under (i) and (ii) for each residential unit. 14.6.2.11 (a)(ii) same as 14.5.2.13(a) (ii) above.	Support in part	The University are concerned about the prescriptiveness of this rule and the potential for perverse, albeit unintentional, design outcomes for a development. PC14 is to enable intensification which includes development greater than four (4) units, subject to built form standards and obtaining resource consent. As an example, consider a six unit, three level development, where two of the six units would be on the ground floor. The outcome anticipated by this rule would be to have 12 m² of area at the gorund floor within the site only dedicated to washing lines. This would not be an attractive use of space nor is it a common provision in developments of a higher intensity such as a three level terraced or apartment style development. This is a similar concern with Rule 14.6.2.11(a)(ii) in the High Density Residential Zone.	
9	Definition of Public Open Space means any open space, including parks and reserves (but excluding local purpose reserves for utility purposes), accessible to the public either freely or in accordance with a charge via the Reserves Act 1977.	Support	In particular as it relates to Rule 14.15.1 (d). Relationship to the street and public open spaces. The University campus grounds should not be considered as public open space and therefore not available to support any reduction of on-site private outdoor	Retain existing definition.

			living area. The Unviersity consider that the current definition supports this position.	
10	14.15.21 Outdoor living space c. Whether the size, sunlight access and quality of on-site communal outdoor living space or other open space amenity compensates for any reduction in private outdoor living space	Support	The University support the proposed addition of 'on-site' communcal outdoor living space. As sites get smaller, the quality of outdoor living spaces is important and with denser living often communal spaces not only contribute to usable amenity and outlook for residents but also support a sense of community. The University would like to make it clear that while the campus positively contributes to the character and amenity of the area, the grounds should not be considered as public and therefore not available to support any reduction of on-site private outdoor living area. The University note that Council is also responsible for the investment in public open space to support the higher density development which is proposed through PC14.	Retaining existing wording.
11	8.5.1.2 (C9) b. The subdivision shall not result in, or increase the degree of, non-compliance with the density standards of the applicable zone. Note: Land use consent is also required where an applicable density standard is breached.	Support in part	Refer to Submission ID 6 above.	Amendment to the standard 14.5.2.1 to align with the MDRS; Or if no density standard is provided then: standard (b) of (C9) should be removed.



	Detai	

Submission Date: 03/05/2023

First name: Nick Last name: Dore

Prefered method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Oppose

I seek the following decision from the Council

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

My submission is that the Council revise the proposed High Density Residential Zone (HRZ) in the Strowan blocks west of Papanui Road, from Normans Road to Blighs Road, to a Medium Density Residential Development (MRZ). This will prevent the unacceptable and unsafe escalation of existing issues related to infrastructure overload in the community and align with the Council's policy to ensure that developments are serviced in an efficient and effective manner, while mitigating adverse effects on existing businesses, rural activities, and infrastructure.

My submission is that:

In the Strowan area, particularly around St Andrews College, there are significant pressures on infrastructure. These include an insufficient supply of on-street parking, increasing traffic congestion, unsafe parking, and issues with stormwater and wastewater networks. During high rainfall events, stormwater infiltration into the wastewater network causes overflows and contaminated floodwater. If Plan Change 14's proposed intensification proceeds, these issues are likely to worsen and result in unsafe transport infrastructure and poorly functioning stormwater and wastewater networks.



Submitter Details

Submission Date: 03/05/2023

First name: Bob Last name: Burnett

Prefered method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Support

I seek the following decision from the Council

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

135 Somerfield St, Somerfield

My submission is that:

I generally support the proposed changes.

That said I disagree with the proposal for 20% glazing area to street frontage. This will provide perverse outcomes where the street boundary has southern orientation.

The effect will be adverse thermal performance and reduced energy efficiency. This is the opposite of what we need to be doing due the currently climate crisis. Noise and privacy may also become compromised due to the rule.

Better consideration also needs to be given to sunlight access.

Should good design and sustainability be incentivized with by way of less restrictive proposed plan changes.



Submitter Details

Submission Date: 03/05/2023

First name: Tom Last name: Logan

Prefered method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Support

I seek the following decision from the Council

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

My submission is that: Relevant clause: 14.2.6.

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

Provision: Chapter 14 Residential

Support

I seek the following decision from the Council

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

My submission is that: Relevant clause: 14.2.7.

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

Provision: Chapter 14 Residential

Support

I seek the following decision from the Council

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

My submission is that: Relevant clause: 14.6.2.2.c.iv.

The removal of recession planes for buildings below 14 m within the HRZ, provided the building is within 20 m (or 60% of site depth) of the front boundary, is a positive change. This is a clear recognition of the idea of 'eyes on the street', where a street is made safer by placing

houses closer to the road boundary. With more people living in these houses in high-density neighbourhoods, this benefit will only increase

Provision: Chapter 14 Residential

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: Amend to previously proposed levels.

My submission is that:

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

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

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

Provision: Chapter 14 Residential

Seek Amendment

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area: Amend, reduce proposed area back to current size of 40 houses.

My submission is that:

Relevant clause: 14.5.2.3_v and 14.4.2.3.iv (2 clauses as this area is currently covered by two different zones that will merge into MRZ). If wanting to reduce area, refer to 'PC14 Planning Maps 31' under 'Maps' section in submission.

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

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

Provision: Chapter 14 Residential

Seek Amendment
I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area: Remove QM entirely or amend to reduce scope.

My submission is that:

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

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

Provision: Chapter 14 Residential

Seek Amendment

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area: Remove entirely or relax recession planes for buildings in HRZ.

My submission is that:

Relevant clause: 14.6.2.2.b (Clause that dictates that recession planes still apply on parts of buildings above 12 m). Buildings in the HRZ are overly constrained by the rules for recession planes, setbacks, height limits, and building separation. In areas with older sites (e.g. Riccarton, Papanui, city centre), the smaller than average site width combined with the aggressive rules means that a 5-storey house is largely not permitted. Given that units taller than 3-stories require additional investments (fire safety controls, lifts), this effectively limits feasible development in some HRZ areas to 3-storeys. Even on sites where the width is equal to the city-wide average width of 20 m, the width of the 5th floor of a building is limited to just 6 m. This reduces the feasibility of building 5-storey units. The rules for buildings in the HRZ are unnecessarily harsh, with the unintended consequence of promoting 3-storey houses over higher-density

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

Affordability: Increasing housing density, both in the city centre and suburbs, would increase the overall housing stock. Reduced housing supply is one of the main drivers of housing unaffordability¹. This is a major issue in New Zealand, where housing construction rates have been declining since the building boom of the 1960s and 70s². This has coincided with an explosion in house prices across the country, which have increased 425% over the past 20 years³. Christchurch is not immune to these issues. While its housing cost to household income ratio of 6.9 in Q2 2022 was lower than other major centres⁴ this is still well above 5 which is when a market is considered 'severely unaffordable'⁵. Christchurch also has the second highest rent to income ratio amongst all major centres in Aotearoa⁶.

Restrictive zoning laws, which force people to build low-density houses, artificially slow down the supply of homes. This lack of supply leads to price increases⁷. There is clear demand in Christchurch for denser housing, as evidenced by the boom in townhouse construction, so CCC should take advantage of this as a means of improving housing affordability.

Sustainability: Denser housing leads to decreased household emissions⁸. Road transport emissions are the single biggest factor in Christchurch's overall emissions profile, and so the council has made a decrease in transport emissions a key part of their emissions reduction plan⁹. Building denser housing, close to key public transport routes, would help to achieve this reduction. With people living closer to employment, services, and amenities, they are more likely to use public or active transport. This would also have health and wellbeing benefits: active transport use can improve physical health, while reduced commutes would mean that people can spend more time socialising, exercising, and partaking in hobbies.

Community: Urban density is associated with improved safety and increased economic vibrancy. Increased number and diversity of people means that streets and amenities are used throughout the day, rather than just in distinct time periods. This increases the demand and resources for amenities as well as increases the safety of our streets and neighbourhoods, with more people being out and about. This array of people is also associated with increased community cohesion due to regular interactions in shared spaces.

Economics: By increasing the number of units within the city, intensification provides new revenue streams for infrastructure improvements. Chronic under-investment in assets is further perpetuated by

¹ Housing Affordability. Re-imagining the Australian Dream. Grattan Institute. March 2018.

² The decline of housing supply in New Zealand: Why it happened and how to reverse it. New Zealand Infrastructure Commission. March 2022.

³ Housing affordability in Aotearoa New Zealand: The importance of urban land supply, interest rates, and tax. The Treasury. 9 September 2022.

⁴ https://www.corelogic.co.nz/news-research/news/2022/hope-for-housing-affordability-as-property-prices-fall

⁵ https://www.pwc.co.nz/pdfs/2018pdfs/affordable-housing-publication-nz-18.pdf

⁶ https://www.corelogic.co.nz/news-research/news/2022/hope-for-housing-affordability-as-property-prices-fall

⁷ Lees, K. (2017). Quantifying the impact of land use regulation: Evidence from New Zealand, Sense Partners, Report for Superu, Ministerial Social Sector Research Fund.

⁸ Lee, S., & Lee, B. (2014). The influence of urban form on GHG emissions in the U.S. household sector. *Energy Policy, 68*, 534-549. https://doi.org/10.1016/j.enpol.2014.01.024

⁹ https://ccc.govt.nz/environment/climateaction/whats-our-way-to-carbon-zero#:~:text=The%20aim%20is%20to%20halve,become%20carbon%20zero%20by%202045.

low-density greenfield development that requires investment in new infrastructure. This takes money away from upgrading existing infrastructure that benefits existing communities. These benefits include flood mitigation measures and other improvements. Increased urban sprawl is linked to increased operational costs for local authorities¹⁰, as services such as rubbish collection and sewage treatment are more expensive to maintain per person in low-density areas¹¹.

¹⁰ Varela-Candamio, L., Rubiera Morollón, F., & Sedrakyan, G. (2019). Urban sprawl and local fiscal burden: analysing the Spanish case. *Empirica*, *46*(1), 177-203

¹¹ Carruthers, J. I., & Ulfarsson, G. F. (2003). Urban Sprawl and the Cost of Public Services. *Environment and Planning B: Planning and Design*, *30*(4), 503–522. https://doi.org/10.1068/b12847

Our proposed Housing and Business Choice Plan Change (14)



Submitter Details

Submission Date: 03/05/2023

First name: Tony Last name: Simons

Organisation:

Riccarton Bush - Kilmarnock Residents' Association

Prefered method of contact Email

Consultation Document Submissions

Provision: Planning Maps

Seek Amendment

I seek the following decision from the Council

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

1- FAILURE TO PROPERLY ASSESS SOCIAL IMPACTS

We submit the plan change should be reviewed once a proper social impact assessment has been completed.

2- SEEKING A RE-DESIGNATION OF THE RICCARTON CENTRE

We submit Riccarton should be a Town or Neighbourhood Centre, not a Large Town Centre

3- SUNLIGHT PRESERVATION: SEEKING AMENDMENT TO THE QUALIFYING MATTER

We submit the Sunlight Qualifying Matter should be more conservative than proposed

4- THE RICCARTON BUSH INTERFACE AREA (RBIA: SEEKING AMENDMENT TO THE QUALIFYING MATTER

We submit the Kauri Cluster should not be disaggregated or dismantled, and all areas referred to in WSP's Putaringamotu Riccarton Bush Heritage Landscape Review (recommended for inclusion in the RBIA) should be limited to 2-storeys and remain Residential Suburban density.

Likewise, those sites on the north side of Ngahere St and in the area between the Avon River and Kahu Rd should also be included in the RBIA, and retain their Residential Suburban zoning.

5- RICCARTON COMMERCIAL/RESIDENTIAL TRANSITION ZONE: A NEW QUALIFYING MATTER

The commercial area north of Riccarton Rd in the Riccarton centre should be height-restricted to a height that is appropriate given the proximity of low-rise residential dwellings immediately to the north.

6- THE AIRPORT NOISE INFLUENCE ZONE: SEEKING AMENDMENT TO THE QUALIFYING MATTER

We submit the properties at 34, 36, 36A, 38, 40, 44, 46, and 48 Kahu Rd, should, for reason and consistency, all be included in the Airport Noise Influence Zone.

7- JANE DEANS CLOSE: A NEW QUALIFYING MATTER

We submit Jane Deans Close should retain its current zoning of Residential Suburban Density Transition [RSDT] which provides for low to medium density residential housing.

8- MATAI STREET WEST: A NEW QUALIFYING MATTER

We submit both sides of Matai St West from Straven Rd east to the railway line, including the area north to the Avon River, should be a Qualifying Matter restricting further residential intensification.

9- RE-EVALUATING WALKING DISTANCES & 6-STOREY ZONES

We submit the walking distances to Riccarton centre boundaries (which we understand the legislation states defines the extent of high density 6-storey residential zones) be reconsidered based, not on distance, but on time taken to walk to key amenities in the centre zone.

10- ON TREES

We submit:

- 1. Protections for trees, and incentives for planting more trees, should be part of the changes proposed in PC14.
- Any financial contributions made to compensate for tree removal should be required to be spent in the area where trees are removed to, at least, replace what was there with equivalent planting.

11- AREAS SUBJECT TO FREQUENT SURFACE FLOODING: A NEW QUALIFYING MATTER

We submit further densification in areas where flooding is frequent and serious (and there is no immediate plan to mitigate) should be prevented by making those areas a qualifying matter.

12- ESTABLISHING A PLANNED PUTARINGAMOTU-RICCARTON PRECINCT: A NEW QUALIFYING MATTER

We submit, in the absence of a properly assessed plan for intensification and development in Riccarton, the entire area represented by the Riccarton Bush Kilmarnock Residents' Association should be designated a Qualifying Matter, with current zonings maintained as agreed in the Christchurch Replacement District Plan Review of 2015, pending a comprehensive planning review.

My submission is that:

After consulting with the Friend of Submitters, we have attached 12 submissions, all contained in one document. The document includes an Introduction plus each subsequent submission starts on a seperate page.

Three submissions support, but seek changes to, Qualifying Matters proposed by the council.

Five submissions seek new Qualifying Matters.

Four submissions seek changes to the maps or question due process.

Figure 21

Attached Documents Name _ RBK Submission on PC14 - FINAL 20230503 APP01-2022_12_20_Putaringamotu Riccarton Bush_Heritage Landscape Review_FINAL APP02-2007-04_CCC_Kauri_Cluster_Newsletter APP03-2123-CCC-Residential-Stage-2-Evidence-of-Ms-Josephine-Schroder-BECA-Attachment-C-18-8-15 APP04-2023_05_01_Kamo Marsh Landscape Memorandum APP05-2023-04-05_Citywide Flooding Update - Agenda of Council Figure 1 Figure 2 Figure 3 Figure 4 Figure 5 Figure 6 Figure 7 Figure 8 Figure 9 Figure 10 Figure 11 Figure 12 Figure 13 Figure 14 Figure 15 Figure 16 Figure 17 Figure 18 Figure 19 Figure 20

FOR THE CHRISTCHURCH DISTRICT PLAN INDEPENDENT HEARINGS PANEL 2023

Regarding Proposed Plan Change 14, Housing and Business Choice

SUBMISSIONS from RICCARTON BUSH KILMARNOCK RESIDENTS' ASSOCIATION

On behalf of the association by Tony Simons rbkresidents@gmail.com

Table of Contents

INTRODUCTION	3
1- FAILURE TO PROPERLY ASSESS SOCIAL IMPACTS	5
2- SEEKING A RE-DESIGNATION OF THE RICCARTON CENTRE	6
RICCARTON'S DESIGNATION	6
SIZE	6
3- SUNLIGHT PRESERVATION – AMENDMENT TO THE QUALIFYING MATTER	8
4- THE RICCARTON BUSH INTERFACE AREA (RBIA) – AMENDMENT TO THE QUALIFYING MATTER	9
ASPECTS FROM THE NORTH OF RICCARTON BUSH	9
THE KAURI CLUSTER	12
ZONING CONFUSION	14
THE IMPACT OF THE CHRISTCHURCH REPLACEMENT DISTRICT PLAN DECISION	15
CONCLUSION - THE RBIA AREA REDEFINED	16
5- RICCARTON COMMERCIAL/RESIDENTIAL TRANSITION ZONE – A NEW QUALIFYING MATTER	17
6- THE AIRPORT NOISE INFLUENCE ZONE – AMENDMENT TO THE QUALIFYING MATTER	18
7- JANE DEANS CLOSE – A NEW QUALIFYING MATTER	19
8- MATAI STREET WEST – A NEW QUALIFYING MATTER	21
9- RE-EVALUATING WALKING DISTANCES & 6-STOREY ZONES	23
10- ON TREES	25
11- AREAS SUBJECT TO FREQUENT SURFACE FLOODING – A NEW QUALIFYING MATTER	26
12- ESTABLISHING A PLANNED PŪTARINGAMOTU-RICCARTON PRECINCT – A NEW QUALIFYING MATTER	30
SPECIAL FEATURES	30
THE IMPORTANCE OF THE CHRISTCHURCH REPLACEMENT DISTRICT PLAN DECISION	31
CHARACTER AREAS	31
APPENDIX 1 - Pūtaringamotu - Riccarton Bush Heritage Landscape Review	34
APPENDIX 2 - Kauri Cluster Street Renewals	34
APPENDIX 3 - Christchurch Suburban Character Area Assessment	35
APPENDIX 4 – Kamo Marsh Landscape Architects' Memorandum in Support	35
APPENDIX 5 – Citywide Surface Water Flooding Update	36

Table of Figures

Figure 1 - Riccarton Bush Kilmarnock Residents' Association area	3
Figure 2 - Illustrating social impacts	5
Figure 3 - The Riccarton centre area	6
Figure 4 - The view looking south to Riccarton Bush and the grounds	10
Figure 5 - Area to add to the RBIA	10
Figure 6 - Kauri Cluster areas appropriate to retain suburban density	11
Figure 7 - WSP's recommended zoning	12
Figure 8 - Zoning confusion	14
Figure 9 - Zoning confusion corrected	15
Figure 10 - The 'new' RBIA area appropriate for residential density	16
Figure 11 - Proposed commercial transition zone	17
Figure 12 - Added sites to the Airport Noise Influence Zone	18
Figure 13 - Jane Deans Close	19
Figure 14 - Entrance to Jane Deans Close	19
Figure 15 - The cairn in Jane Deans Close	20
Figure 16 - Matai Street West	21
Figure 17 - Walking times/distances	23
Figure 18 - Titoki St	27
Figure 19 - Ngahere St	27
Figure 20 - Nikau Place 2022	28
Figure 21 - Nikau Place 2022 & 2023	28
Figure 22 - Bradshaw Tce	29

INTRODUCTION

The Riccarton Bush Kilmarnock Residents' Association represents residents in what was part of the founding borough of Riccarton, bordered by Riccarton Rd and the Avon River. The eastern boundary is the railway line and our area extends west to Clyde Rd [Fig 1].

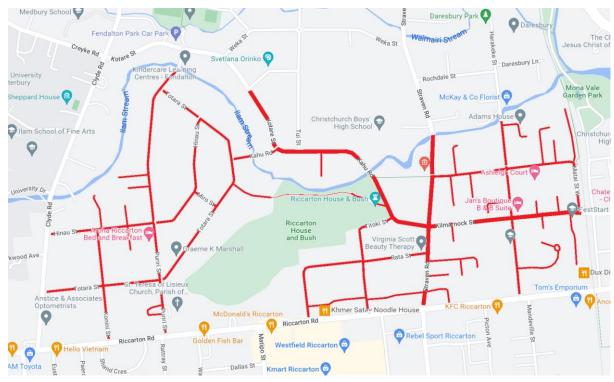


Figure 1 - Riccarton Bush Kilmarnock Residents' Association area

The association has more than 200 financial members spread across the area.

It was formed in the mid-1990s (incorporated Mar 1996) to support our residential community resisting commercial development encroaching north from Riccarton Rd.

That still remains an aim but, in more recent years, we have become equally concerned about crime and safety, road and amenity maintenance, traffic speed and flows on local streets, on-street parking and unsympathetic residential and commercial development creeping out from the CBD.

Within our area there are distinct communities of interest which are, to a greater or lesser extent, threatened by the impact of overblown, premature and unnecessary residential re-zoning, the impacts of which have not been properly assessed.

Many of these are referred to in this submission.

We are particularly concerned about high-density 6-storey residential intensification proposed by PC14 for most of the area east of Riccarton Bush.

We are advised, given the constraints imposed by the legislation, there are limits around what we can influence and what changes the city council (and therefore the IHP) can recommend with respect to PC14.

The areas of influence we are concerned with are:

- 1. Centre designations and boundaries appropriate for the level of activity and services in those centres.
- 2. Appropriate density and height limits for the level of activity and services.
- 3. The extent of walkable catchments which should also define the extent of high-density residential zones.
- 4. Qualifying matters that might justify reducing the level of intensification enabled.

We have consulted before finalising these submissions. They are fully supported by our members.

We have also shared our submission document with the Friend of Submitters, Jane West who provided some guidance.

Additionally, we have engaged landscape architects, Kamo Marsh to assist with expert evidence supporting relevant submissions [see attached memo - Appendix 04]

1- FAILURE TO PROPERLY ASSESS SOCIAL IMPACTS

The social impacts [Fig 2] of the levels of intensification proposed in Plan Change 14 are, we submit, significant, and yet PC14 appears to lack any adequate social impact assessment, as required by s32 of the Resource Management Act.

For reference, s32 of the RMA requires an evaluation report 'with a level of detail that corresponds to the scale and significance of the environmental, economic, **social**, and cultural effects that are anticipated from the implementation of the proposal'.

It must also 'identify and assess the benefits and costs of the environmental, economic, **social**, and cultural effects that are anticipated from the implementation of the provisions.' [emphasis added]

Further, the Act requires that this detailed report must have been made available for public inspection before or at the same time as the proposal is notified. [emphasis added]





The potential result of permitted medium density standards in a typical Otautahi/Christchurch suburb.

Figure 2 - Illustrating social impacts

We support other submitters [including the Christchurch Civic Trust] arguing that these requirements have not been met, particularly in terms of the social effects of the proposal, nor with a level of detail or rigour corresponding to the proposal's scale and significance, nor in time for proper consultation.

We submit therefore the plan change should be reviewed once a proper social impact assessment has been completed.

2- SEEKING A RE-DESIGNATION OF THE RICCARTON CENTRE

RICCARTON'S DESIGNATION

We submit Riccarton should be a Town Centre or Neighbourhood Centre, not a Large Town Centre because it is immediately adjacent to the Christchurch CBD. Only Hagley Park separates the two centres.

Placing a large town right next to a metropolitan centre is odd and inappropriate and, we submit, an accidental and unintended result of poor planning and poorly regulated urban development over a long period of time, at the expense of both Riccarton and the CBD.

A Large Town Centre designation for Riccarton allows taller commercial buildings (up to 22 metres). This is inappropriate particularly where the TCZ butts hard against 2 and 3 storey housing zones just north of Riccarton Rd (Fig 3).

If a city council priority is rejuvenating the central city, designating Riccarton a Large Town is a mistake. It will further draw residential and business activity away from the CBD.

We submit large centres be some distance from the centre where they can support surrounding urban areas, complementing the city council's objectives, not working against them.

SIZE

The eastern boundary of the Riccarton centre has been set at Harakeke St for no apparent reason, creating a longer rectangular commercial area which has unintended consequences when comes to the level of intensification allowed in the surrounds.

Locally, the centre boundary has always been regarded as Picton Ave [the blue line on Fig 3] and that is where it should be placed.



Figure 3 - The Riccarton centre area

The impact of a large town designation and wider boundaries, coupled with the centre destination for Church Corner to the west, will permit an almost continuous corridor of 6-storey residential densification all the way from the CBD to Curletts Road and Villa Maria College.

We submit this is an absurd and unnecessary over-liberalisation of planning rules over far too large an area created unforeseen social impacts.

It is within the city council's power to reconsider the Riccarton centre designations and make the commercial area smaller in order to encourage activity and growth where it needs to happen, in the city.

3- SUNLIGHT PRESERVATION — AMENDMENT TO THE QUALIFYING MATTER

We strongly support a sunlight qualifying matter putting limits on building heights, recession planes and set-backs to preserve residents' access to sunlight.

However, we submit the Sunlight Qualifying Matter should be more conservative than proposed, to preserve sunlight to the same degree as is enjoyed under current density rules.

RMDS were not formulated taking into account Christchurch conditions or the Christchurch context which makes them unfair and inequitable.

The sunlight qualifying matter should not decrease the level of access to light that we currently enjoy, determined after proper consultation and examination during the 2015 Christchurch Replacement District Plan Review.

We believe the impact, in terms of the level of densification this would limit, would be insignificant and would in no way jeopardise the overall aims or objectives of the NPS-UD.

Notwithstanding the fact the proposed QM proposes a more conservative approach to treat Christchurch the same as Auckland to compensate for latitude difference, the shading (and therefore cooling) impacts are still different in Christchurch.

RMDS take no proper account of geography, climate, temperatures or sunshine hours in Christchurch.

Additionally, the social impacts of less sun, more shade, and cooler environments have not been properly assessed for Christchurch.

Rules around setbacks and recession planes to preserve sunlight should be entirely designed for the Christchurch context.

4- THE RICCARTON BUSH INTERFACE AREA (RBIA) – AMENDMENT TO THE QUALIFYING MATTER

The city council proposes a qualifying matter, the Riccarton Bush Interface Area, to physically protect Riccarton Bush and Grounds and preserve views of the bush.

A Pūtaringamotu - Riccarton Bush Heritage Landscape Review by WSP, commissioned by the city council [Appendix 1], supports extending it.

The report was in response to objections raised about the impact of densification on the bush and surrounds. We support the RBIA but we were not consulted on its terms of reference and submit they were too narrow.

The report shows that aspects of the bush, when viewed from outside the bush area, would be significantly impacted if taller buildings were allowed to be built around it. It rightly argues those views should be protected.

The report recommends retaining residential suburban densities (limiting heights to 2-storeys) to preserve those views. However, it missed some areas and does not go far enough to ensure consistency.

In parts of the RBIA city council planners propose retaining the underlying RMDS zoning, with its more liberal site coverage, recession plane and setback rules, effectively creating hybrid 2-storey medium density zones.

These zones will still enable:

- Three dwelling on any site with more liberal recession planes
- A 1.5 metre setback from the footpath and only 1 metre on all other boundaries
- 50% site coverage
- Just 20% of the site as outdoor living space
- Just 20% glazing on street facing facades
- A mere 20% plant or tree coverage on the site

This side-steps WSP's recommendations. It stitches together different rules. It has not been assessed for environmental or social impacts and should not be applied.

The specifics of our submission on this matter, calling for modifications to the RBIA, are as follows:

ASPECTS FROM THE NORTH OF RICCARTON BUSH

The small residential area directly north of Riccarton House and Bush, bounded by Ngahere St, Totara St and Kahu Rd [shown with a blue stripe in Fig 5], should be included in the RBIA:

- recognising the importance of the views, setting, surroundings and context of the residential environment
- preserving its amenity and character
- for consistency with the Qualifying Matter proposed.

We submit WSP's Pūtaringamotu - Riccarton Bush Heritage Landscape Review did not adequately consider the visual impact from the north. Taller buildings will block views [Fig 4] from both Kahu Rd and Kotare St.

Nor did the report adequately assess the impact on views from Riccarton Bush grounds of 34, 36 and 36A Kahu Rd. This part of our submission is supported in an initial assessment by Landscape Architects, Kamo Marsh [Appendix 4].



Figure 4 - The view looking south to Riccarton Bush and the grounds

Neither did the WSP review consider the importance of including both sides of Ngahere St in the RBIA.

It is a busy cul-de-sac, a major cycleway, and one of only two public access points to Riccarton House and Bush. Placing additional traffic, pedestrian and on-street parking pressure on this street is unreasonable, inappropriate and unsafe.

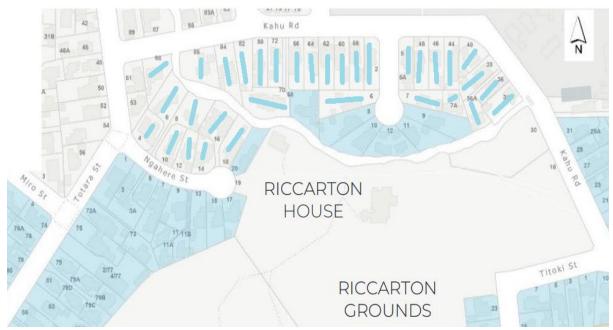


Figure 5 - Area to add to the RBIA

The south side of Ngahere St is recommended by the city council to be part of the RBIA therefore, for consistency, so should the north side. It is also right to include all these sites in the RBIA because

of their close proximity to Riccarton House and Bush, the Avon River, the historic Deans farm buildings and the Christchurch Boys High School site.

The area we propose should be added to the RBIA is [Fig 5] marked with a blue stripe.

THE VIEW FROM RICCARTON BUSH AND GROUNDS

The black circle [Fig 6] indicates the area directly opposite the main entrance driveway to Riccarton House that the city council proposes to change to medium density but with a height limit of 2-storeys -indicated by the vertical red stripes.

The area is part of the RBIA because it is visually in the immediate vicinity of the grounds and bush, however this is the type of stitched-together zoning we referred to earlier, the impacts of which have not been properly assessed.

Higher density along Kahu Rd will allow building just 1.5 metres back from the footpath greater site coverage, more liberal recession planes and, significantly for this area, less space for trees.

The area is the main aspect (view) seen from the Riccarton House grounds and driveway. This aspect, we submit, is also relevant when considering views and building density in the area.

This area (being 6-35 Kahu Rd) should be zoned Residential Suburban as part of the RBIA Qualifying Matter.

This submission is supported in an initial assessment by Landscape Architects, Kamo Marsh [Appendix 4].



Figure 6 - Kauri Cluster areas appropriate to retain suburban density

THE KAURI CLUSTER

We propose the RBIA should preserve residential suburban zoning in the entire area of the Kauri Cluster to the south and east of Riccarton Bush and grounds, recognising the importance of the setting, surroundings and context of this residential environment, including its amenity, character and historical context.

The Kauri Cluster is the residential community including Kauri St, Rata St, Titoki St, and Rimu St [the areas circled in red, green and yellow on Fig 6].

It also includes the north side of Rata St and the west side of Rimu St (bordering the Riccarton House grounds) which are proposed to remain Residential Suburban under the RBIA.

PC14 proposes (rather confusingly) that the areas within the coloured circles will be medium density, but some will be 2 storeys and some 3 storeys.

The WSP review made specific recommendations around which areas should retain suburban density. These included all the areas marked in pale blue [Fig 7].

Council planners appear to have over-ruled their own landscape expert, WSP choosing to support the recommendation only in part.



Recommended modifications and additions to Christchurch City Council proposed protection and setbacks for Pūtaringamotu.

Figure 7 - WSP's recommended zoning

The Kauri Cluster is an area of special importance to the community.

The streets fall within what was part of the Deans Farm in the late 19th century.

The area is within the jurisdiction of the Waipuna Halswell-Hornby-Riccarton Community Board which, in 2007 (when it was the Riccarton/Wigram Community Board), labelled it "The Kauri Cluster" [Appendix 2].

At that time the council undertook extensive works to renew and enhance the area's local and residential character

- All roading, kerbing and channelling in the area was renewed
- The streets were lined with native trees matching te reo Māori street names
- Wide grassed berms were added
- Road layout was altered to calm traffic
- Native plant beds were added
- The roads were narrowed at all intersections
- Spring-fed water features were installed on road reserve land in Kauri and Rata Streets
- Limited time on-street parking was retained in response to growing on-street parking pressures
- The speed limit in these streets was also later reduced to 30kph.

These works were designed to support and reinforce the intimate residential nature of the area and the community of interest.

This community eschews association with the Riccarton commercial area and identifies strongly with the history and residential character influence of Pūtaringamotu Riccarton Bush and its surroundings.

The proposed zoning for parts of this area, limiting heights while maintaining higher density, was a hasty desktop review intended as a compromise and its effects have not been adequately assessed.

ZONING CONFUSION

When released on Monday 17 April 2023, the council planning map for those areas that sit inside the Riccarton Bush Interface Area that are labelled MRZ, stated that densification would be limited to one 2-storey dwelling per site [see under Qualifying Matters in Fig 8].

That description was only changed on or about 18 April after we queried it with council staff.

We subsequently received an apology but, we submit, the new description [Fig 9] is still confusing



Figure 8 - Zoning confusion

and wrong, in part because it refers to 20 metre buildings in the surrounds when, in fact, the height limit proposed is 22 metres. Two addresses 2/7 Rimu St, and 6C Rimu St were also wrongly described as residential suburban. That too was subsequently changed after we pointed it out.

Mistakes and confusion related to these somewhat arbitrary and hastily cobbled-together zones, has implications in terms of the IHP hearings process which relies on unambiguous, accurate information being provided by the council in plenty of time.

These mis-directions also beg the question, how might they have affected submissions just a few weeks out from the submission deadline and, if it is accepted that they may have, how can this be corrected?

Again, we argue because these areas are limited to 2-storeys under the QM, it is appropriate to leave them Residential Suburban. That would be consistent with the way the yellow areas to the north west, also covered by a QM (the Airport Noise Contour), have been zoned.

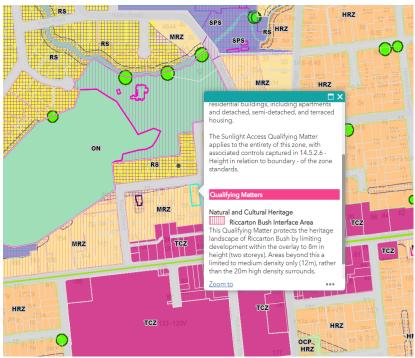


Figure 9 - Zoning confusion corrected

THE IMPACT OF THE CHRISTCHURCH REPLACEMENT DISTRICT PLAN DECISION

The entire area around Riccarton Bush including the Kauri Cluster [Fig 10] forms part of a larger precinct that, during the Christchurch Replacement District Plan Review, the city council recommended should not be re-zoned for medium density.

The 2015 IHP, chaired by Hon. Sir John Hansen, supported that view. In its decision the panel stated:

"... on balance, we consider we should not make... direction for notification of more RMD zoning in this locality. Part of what influences us to that view is the need for particular care in ensuring appropriate urban design outcomes, especially given the established amenity values in the vicinity of Riccarton Bush.

We couple that with the concerns expressed by residents as to how significant additional RMD zoning would impact on the amenity values of their neighbourhood... [and] we do not consider it appropriate to revisit the election the Council has made against further intensification in this locality at this time. If, and when, this should occur ought to be left to the Council to determine and initiate.

We record, however, that the decision we have reached was a finely balanced one."

Unlike PC14, the 2015 review was wide-ranging, intensively researched and widely consulted on.

We submit that panel's decision should be considered relevant in this context. It was well-founded and should be respected.

We also note the decision is recorded as "finely balanced," however, it was made at a time when there was a housing shortage in Christchurch following the earthquakes, and there was immense pressure to densify in response to that.

Twelve years on from the earthquakes, as the city council's own reports state, a critical shortage no longer exists. A similar decision, along the same lines today, would not need to be "finely balanced".

CONCLUSION - THE RBIA AREA REDEFINED

We submit the Kauri Cluster should not be disaggregated or dismantled, and all areas referred to in WSP's Pūtaringamotu Riccarton Bush Heritage Landscape Review (recommended for inclusion in the RBIA) should be limited to 2-storeys <u>and</u> remain Residential Suburban density.

These areas show as solid pale blue and brown on the map [Fig 10]. This submission is supported, in part, by an initial assessment by Landscape Architects, Kamo Marsh [Appendix 4].

Likewise, those sites on the north side of Ngahere St and in the area between the Avon River and Kahu Rd should also be included in the RBIA, and retain their Residential Suburban zoning.

Those sites are marked with a blue stripe [Fig 10].

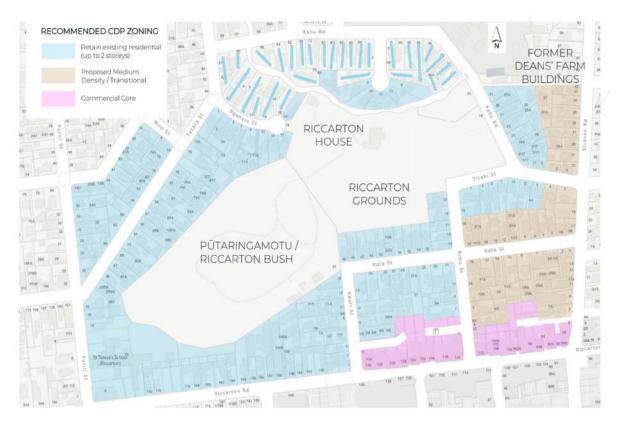


Figure 10 - The 'new' RBIA area appropriate for residential density

5- RICCARTON COMMERCIAL/RESIDENTIAL TRANSITION ZONE – A NEW QUALIFYING MATTER

The residential area, north of Riccarton Rd, between Kauri St and Straven Rd, is proposed to be zoned low-rise as part of the Riccarton Bush Interface Area Qualifying Matter.

However, on the area's southern boundary, along Riccarton Rd, the town centre zone (TCZ) extends from Kauri St all the way east to Harakeke St [Fig 11].

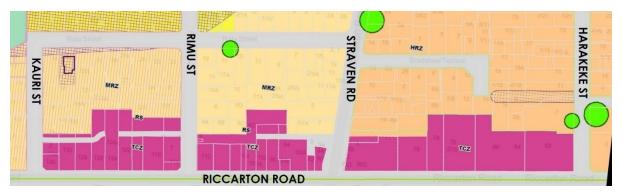


Figure 11 - Proposed commercial transition zone

Notwithstanding our already stated objection to the TCZ zone extending that far east, we object to commercial zoning that will permit this level of commercial height and density abutting residential areas of 2 (or even 3) storeys.

The commercial area north of Riccarton Rd, we submit, should be height-restricted to a height that is appropriate given the proximity of low-rise residential dwellings immediately to the north.

We support other submitters (including Waipuna Halswell-Hornby-Riccarton Community Board and Helen Broughton), arguing the same.

The social and environmental impacts of tall commercial buildings in this area have not been adequately assessed.

We suggest some would include:

- 1. Total loss of outdoor privacy
- 2. Significant afternoon shading, particularly in the summer and in the areas further east
- 3. Changed and unpredictable wind and airflow patterns
- 4. Solar heating of the tall north facing vertical surfaces resulting in changes to air temperature, and mean radiant temperatures in the surrounding area
- 5. Unpredictable micro-climate effects
- 6. Adverse social and mental health impacts for those living directly next to a high-rise commercial area

6- THE AIRPORT NOISE INFLUENCE ZONE — AMENDMENT TO THE QUALIFYING MATTER

We support the proposed Airport Noise Contour Zone Qualifying Matter but submit it should be extended to take account of actual flight paths being used on approach to the airport, in one area in particular.

This Qualifying Matter, restricts densification but, inexplicably, leaves out a small area of Kahu Rd bordered by the Avon River and Christchurch Boys High School in the vicinity of the historic Kahu Rd bridge.

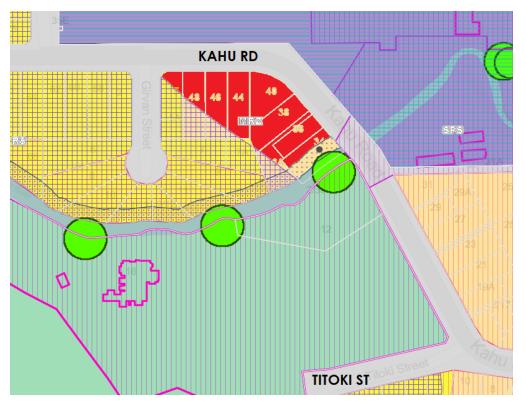


Figure 12 - Added sites to the Airport Noise Influence Zone

Under PC14, eight isolated addresses [in red on Fig 12] will not fall under the QM and show as MRZ. These properties are also overflown by aircraft arriving at Christchurch Airport.

There is evidence from Airways New Zealand (presented by submitter Shirley van Essen) showing they are overflown by aircraft arriving at Christchurch Airport and are as impacted by aircraft noise as other nearby properties in the zone.

The authority also concedes a number of pilots are not trained, nor are their aircraft equipped, to remain strictly within the intended approach air corridor, and therefore make wider visual approaches outside that corridor.

We submit the properties at 34, 36, 36A, 38, 40, 44, 46, and 48 Kahu Rd, should, for consistency, be included in the Airport Noise Influence Zone.

7- JANE DEANS CLOSE - A NEW QUALIFYING MATTER

Jane Deans Close is a more recent addition to our community of interest.

The street [Fig 13] is a cul-de-sac off Harakeke St, close to Riccarton Rd. The Fo Guang Shan Buddhist Temple is directly south on the Harakeke St - Riccarton Rd corner. The street is named after early Riccarton settler and community leader, Jane Deans.

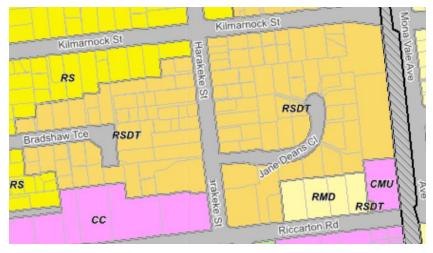


Figure 13 - Jane Deans Close

The street was formed and developed in the late 1990s and reflects the character and architecture of that time. All the houses in the street were constructed at about the same time. Most are two storeys with substantial gardens.



Figure 14 - Entrance to Jane Deans Close

The entrance to Jane Deans Close [Fig 14] and a cairn at the end of the cul-de-sac commemorate the soldiers of the 20th New Zealand Infantry Battalion and Armoured Regiment who lost their lives in Greece, Crete, and North Africa from 1939 to 1945.

The cairn was erected soon after the street was formed post-1997 and replaced an original memorial erected in 1948 that had been nearby.

An ANZAC Day commemoration is held annually in the street at the cairn [Fig 15].



Figure 15 - The cairn in Jane Deans Close

PC14 proposes Jane Deans Close be re-zoned high-density residential, meaning 6-storeys.

We submit that level of development is inappropriate because of its special character and social significance, and recognising its importance as an ANZAC memorial street.

We submit Jane Deans Close should retain its current zoning of Residential Suburban Density Transition [RSDT] which provides for low to medium density residential housing.

The zone already adequately provides potential for infill and redevelopment at higher densities than those in a Residential Suburban Zone.

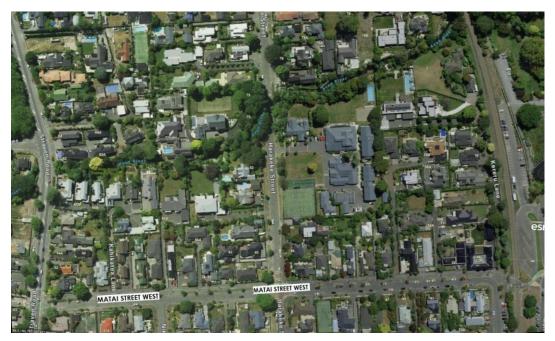
8- MATAI STREET WEST – A NEW QUALIFYING MATTER

We submit both sides of Matai St West from Straven Rd east to the railway line, including the area north to the Avon River, should be a Qualifying Matter restricting further residential intensification.

This submission is supported in an initial assessment by Landscape Architects, Kamo Marsh [Appendix 4].

Restricting intensification would maintain existing building heights and recognise the importance of the setting, surroundings and context of the environment, including, but not limited to safety, amenity, character and items of historical significance.

Matai St West [Fig 16] is one of the original streets in old Riccarton. Mona Vale is in the top right-hand corner.



We submit this street, and the area directly north up to the river, is inappropriate for 6-storey development close to the street and river.

Figure 16 - Matai Street West

Both sides of the street as far up as the Avon River (including Kahikatea Lane, Nikau Place, Harakeke St to the bridge, and Kereru Lane), should be zoned Residential Suburban for environmental, safety and character reasons.

Matai St West and its surroundings is a mix of pre-war, post-war and modern housing, single and 2-storeys.

It used to be a wide street but, with its conversion to a major cycleway in 2017, is now tree-lined and has become the main cycle and pedestrian connection between the city, Riccarton Bush and the university, co-existing with cars.

It is also heavily used by commuters and students at Christchurch Boys and Christchurch Girls High Schools and connects directly to the major Northern Line cycleway running parallel to the railway line along the western boundary of Mona Vale.

The narrowed street made space for cycles and cars separated by a berm with trees, with carparking still permitted on both sides.

This Uni-Cycle route was named the Supreme Winner of the national Bike to the Future Awards in 2018 as well as taking out the Built Excellence Award, in part because of the work done on Matai St West.

However, the changes have not come without challenges.

Residents report road users need to be particularly careful given the volume of cycle traffic coexisting with cars that are parked on both sides of the street Monday to Friday.

This creates safety issues for cyclists, drivers and residents driving into their properties across the cycleway.

Cars parked on both sides also means parts of the street become single lane at times, and there remain safety problems at the Harakeke Street intersection with confusion over cyclists' rights of way.

High density development, with no requirement for off-street parking, will seriously exacerbate all these problems.

There is no scope to remodel the street or make it wider without removing the trees and berm, or the cycleway, or both.

Landscape architect, Di Lucas ONZM, BSc, DipLA, MLA, told us the Ōtākaro / Avon corridor should also have been better addressed in PC14 as an important contributor to our natural and cultural heritage landscape.

The proximity of the iconic Avon River and Mona Vale and the number of mature trees in the area, we submit, also invite consideration for retaining residential zoning in this area.

6-storey high-density development in Matai Street West would, we submit:

- Significantly shade the north side of the street including the cycleway (a pedestrian and cycle safety issue, particularly in winter)
- Increase vehicle traffic congestion
- Place more pressure on on-street parking
- Place roadside trees at risk (either from shading, root disturbance, increased traffic or by encouraging their removal by developers).
- Result in other mature trees on sites being removed (very few are council-protected)
- Overlook and adversely impact the Avon River corridor and properties on the north bank of the river
- Overlook Britten Stables and Mona Vale
- Adversely affect the character and social coherence that exists in the Matai Street West community.

9- RE-EVALUATING WALKING DISTANCES & 6-STOREY ZONES

We submit the walking distances to Riccarton centre boundaries (which we understand the legislation states defines the extent of high density 6-storey residential zones) be reconsidered based, not on distance, but on time taken to walk to key amenities in the centre zone.

One of the stated aims of the intensification legislation is to discourage the use of cars by incentivising people to walk to key amenities.

However, the extent of high-density residential zones is loosely based on walking distances, not verified walking times; and the distances are measured to centre boundaries, not to key amenities such as supermarkets.

We submit walking times should be calculated to key amenities because, where centres are long and narrow, such as Riccarton, the walking time becomes impossibly long.

A clear example is the city planners' decision to define the eastern boundary of the Riccarton town centre at the corner of Riccarton Rd and Harakeke St [red X on Fig 17].

The only amenities at that corner are a medical rooms/pharmacy and a Domino's Pizza shop.

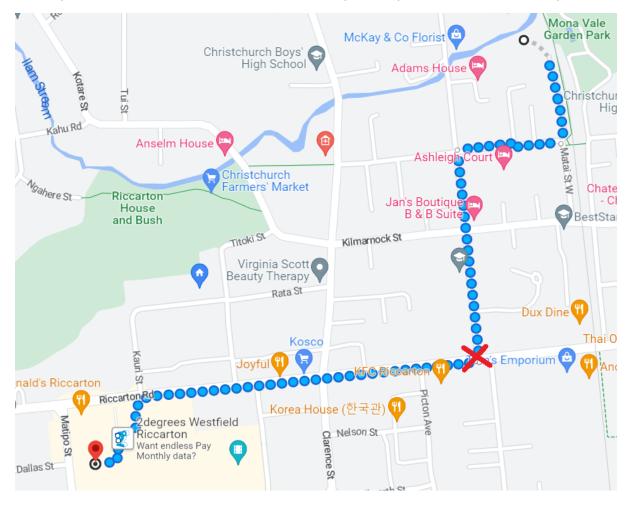


Figure 17 - Walking times/distances

We tested walking times and, walking the shortest route, the blue dotted line, from the north-west edge of the high-density zone (Kereru Lane) to the Harakeke St corner¹ takes 10 minutes, but then it is another ten minutes to the supermarket in Westfield Mall².

That is 20 minutes to a critically important amenity and another 20 minutes talking back, and we did not conduct our test carrying bags of groceries, nor did we test it for people of varying abilities.

This was not what the legislation intended and it calls into question again the thoroughness of the assessment of the social impacts of PC14.

Instead:

- Walking times should be based on the time it takes to walk to key amenities.
- Centre boundaries, if they are required to be used to determine the extent of 6-storey (walkable) zones, should be adjusted accordingly.
- Walking times should be tested in real time taking into account local conditions such as traffic, controlled intersections and any other barriers.
- They should take into account pedestrian capability, and not assume everyone is equally abled.

¹ Google Maps states the distance is 850 metres and the walking time is 11 minutes

² Google Maps states the total distance is 1.6km and the walking time is 21 minutes

10- ON TREES

We support stronger measures to increase tree canopy cover in Christchurch.

There is no dispute about the critical environmental and social benefits of retaining and growing canopy cover particularly in Christchurch which has the lowest of any major metropolitan area in the country.

However, we note no provision is made in PC14 to prevent trees (other than those few classified by the city council as notable) being removed, regardless of their size, age, or significance to our local community.

We support many other submitters who argue for a plan change that better supports a rapid and significant increase in tree canopy cover across all of Christchurch, not just in parks and reserves.

The city council proposes imposing levies on developers, who choose to fell trees in urban areas, to compensate for their loss and to fund additional planting elsewhere.

The measures are, we submit, inadequate and insufficient dis-incentive because of the significant profits that flow from creating extra space for buildings, concrete and asphalt.

Replacing mature trees with saplings, many of which do not survive, is not adequate compensation nor does it, in the short to medium term, provide shade or reduce heat-island effects in urban areas.

What is more, there appears to be no requirement for the financial contributions to be spent in the area where the damage is done.

Contributions made to compensate for felling trees in Riccarton might end up being used to fund plantings in a completely different location.

We submit:

- 1. Protections for trees, and incentives for planting more trees, should be part of the changes proposed in PC14.
- Any financial contributions made to compensate for tree removal should be required to be spent in the area where trees are removed to, at least, replace what was there with equivalent planting.

11- AREAS SUBJECT TO FREQUENT SURFACE FLOODING – A NEW QUALIFYING MATTER

A number of streets in our area experience serious surface water flooding in prolonged moderate to heavy weather events and, of course, these are expected to occur more frequently.

This is also a health issue because some residents report overloaded systems frequently mean they cannot flush toilets or drain showers until water levels recede.

Streets commonly affected include

- Titoki St [Fig 18]
- Kahu Rd (on the bend north of the bridge)
- Ngahere St [Fig 19]
- Nikau Place [Figs 20-21]
- Bradshaw Terrace [Fig 22]
- Matai Street West

There appears to be no reference anywhere in PC14, nor are Qualifying Matters proposed, to protect against the on-going and growing risk and frequency of surface water flooding on many vulnerable Christchurch streets.

The city council has admitted it will not be able to fix surface flooding issues on many of the Christchurch streets which are most frequently flooded in heavy rain. It can only mitigate flooding and, in some cases, the cost of doing that will be prohibitive.

Infrastructure limitation and scientific climate change projections (including their effects) should be more of a consideration when considering Qualifying Matters where flooding is frequent, is expected to get worse and the problem cannot (or will not) be fixed.

A Citywide Surface Water Flooding Update report [Appendix 5] from the CCC meeting agenda of 5 April 2023 shows the council is yet to investigate or prioritise this work.

The report shows:

- The council has not prioritised flooding issues across the city or developed plans to fix them, although it does have a list of potential projects.
- Many of these projects will not be viable or feasible given their scale, technical challenges and the costs of the work relative to the benefits.
- It may be possible, from an engineering perspective, to significantly reduce flood risk in some ponding-prone streets but it may not be viable to do so.
- More work is needed to confirm if remedial work is viable or feasible at problem spots across the city.

This could, we suggest, take years. In many cases we suspect the problems will never be fixed.



Figure 18 - Titoki St



Figure 19 - Ngahere St



Figure 20 - Nikau Place 2022



2 April 2023 11.38pm end of Nikau Place flooded due to kerb stormwater sump/outlet unable to drain during rain event



21 July 2022 9.30am Upstairs shower. Nikau Place, unable to drain away due insufficient waste water network capacity/overflow from stormwater network. If we had flushed the toilet the bowl would likely have overflowed.

Figure 21 - Nikau Place 2022 & 2023





Bradshaw Terrace after moderate rainfall

Figure 22 - Bradshaw Tce

There are numerous surface water flood-prone residential streets in Christchurch being rezoned for medium-density or high-density housing.

More intensification in these streets will allow greater site coverage and introduce more impermeable surfaces. It will also increase the population on these sites, generating even more wastewater. These influences will exacerbate flooding problems.

City Council Manager for Planning, Mark Stevenson tells us the council does have a Wastewater and Water Supply bylaw (2022) that gives staff the discretion to approve or reject any new wastewater or stormwater connection, however there is no recognition, in existing Qualifying Matters proposed, of the impact of frequent surface flooding on many Christchurch streets (except where sites are close to rivers or the coast) so we have little confidence that council discretion will be effective in preventing these problems from getting worse.

We submit further densification in areas where flooding is frequent and serious (and there is no immediate plan to mitigate) should be prevented by making those areas a qualifying matter.

12- ESTABLISHING A PLANNED PŪTARINGAMOTU-RICCARTON PRECINCT – A NEW QUALIFYING MATTER

The city council's own submission on the NPS-UD argues the level of intensification proposed is not necessary to meet national policy objectives.

We submit, in the absence of a properly assessed plan for intensification and development, the entire area represented by the Riccarton Bush Kilmarnock Residents' Association [Fig 1] should be designated a Qualifying Matter, with current zonings maintained as agreed in the Christchurch Replacement District Plan Review of 2015, pending a proper comprehensive planning review.

SPECIAL FEATURES

There are valid reasons (many canvassed earlier in this submission) why our area should not be intensified more than current zoning allows.

Riccarton House is the original site of European settlement in Christchurch. Ngāi Tuahiwi lived in the area before Europeans arrived. The area is a treasure because it tells a story of indigenous settlement, then European settlement, conflict, cooperation, and development.

Despite change over time, much of the area's character remains, and what is left should be protected.

There are important heritage buildings and trees scattered throughout old Riccarton. The precinct still includes a large number of late 19th century to mid-20th century residences, plus:

- Mona Vale on the north-eastern boundary
- Britten Stables
- The city to university cycleway along Matai St West and Ngahere St.
- Riccarton House and its surrounds (including the Kauri Cluster, Kahu Road and Totara Street)
- Notable trees that were planted on the original Riccarton farm and along the original entrance to Riccarton House (now on private land)
- The original Riccarton Estate farm buildings
- the historic Kahu Rd bridge
- Janes Deans Close war memorial
- Christchurch Boys High School buildings and war memorial
- Most importantly, Pūtaringamotu, part of which the Deans family retained for preservation
 as Riccarton Bush. That stand of ngahere is a taonga and almost all that is left of the original
 indigenous forests of the plains.

THE IMPORTANCE OF THE CHRISTCHURCH REPLACEMENT DISTRICT PLAN DECISION

The residents in our area have already been through the intensification debate once already.

There were lengthy proceedings prior to 2015, before an Independent Hearings Panel, considering the Christchurch Replacement District Plan.

Residents came out in force opposing wholesale densification.

That Panel, chaired by High Court Judge, Sir John Hansen heard all arguments both for and against intensification. It considered the historical and environmental questions. It listened to what residents wanted and what planners and politicians were arguing was necessary.

The Panel was also considering these arguments at a time when there were fears Christchurch may be facing an ongoing housing supply crisis after the earthquakes.

Its deliberations were based on evidence, not government-imposed dictates. It ruled medium density was not appropriate in our area.

Seven years after that review we have enough houses in Christchurch and ample land on which to build more. The argument today, in favour of more density across the entire city, is weak.

There is nothing to suggest that panel's decisions, reached after thousands of pages of evidence were heard, should be overturned.

CHARACTER AREAS

As part of that same district plan review, Character Areas, formerly known as Special Amenity Areas or SAMs, were reassessed to identify whether they remained distinctive with a residential character worthy of retention.

A Christchurch Suburban Character Area Assessment [Appendix 3] was prepared for Christchurch City Council by Beca Ltd and presented as evidence. That report stated the intention of Character Areas was to:

- recognise elements and the overall character of each area and allow for management of the area as a whole
- 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.

Our association made representations at the time supporting the retention of Character Area 7, and arguing it be extended.

Character Area 7, was the area north of Riccarton Road and east of Clyde Road, bounded by the Avon River to the north, and Riccarton Bush to the south-east. It included Totara, Hinau, Miro and Konini Streets and major section of Puriri St.

The report determined, given the circumstances at the time, the existing character areas should not be retained.

The circumstances at the time were (according to the report):

- There had already been some erosion of the characteristics of these areas.
- The earthquakes further exacerbated this.
- There was some confusion at the time over the intent and extent of control provided by Character Area provisions.

The Beca report found about half the dwellings and properties in Character Area 7 retained character that would justify the area for character status but that the overall coherence of the area had been significantly eroded through new development and some infill development.

It would, we suggest, have made similar findings with respect to other areas of old Riccarton, had that been in the terms of reference.

The upshot was, the character designation was lifted. We think it was a short-sighted decision.

However, while it was determined there were insufficient groupings of properties for this area to be retained as a Character Area, the report did acknowledge the area has defining elements that include; the quality of the streetscape, the large building setbacks, the visual relationship to Riccarton Bush and the Avon River and the resulting unusual street layout.

It considered that these elements merited an appropriate design response, being:

- Setbacks, a minimum of 8m from Riccarton Bush
- 1-2 storey single family dwellings
- Large side setbacks.

These same design responses, we submit, are relevant today as our entire area faces the prospect of being re-zoned for medium and high-density housing, with no adequate constraints and only Qualifying Matters to protect us.

There is a strong community interest in retaining existing densities and no significant opposition to limiting densification, nor will the inability to intensify up to 6-storeys in our area place in peril any of the overall aims or objectives of the NPS-UD.

The NPS-UD objectives centre around the need to provide more housing and more affordable housing across the country and yet, in Christchurch, house prices are already the most affordable of any large centre, and there is no shortage.

Christchurch has ample supply and yet the annual rate of decline of house prices (at about 7%) is slower than other centres^{3.} A large part of that price reduction only applies to the type of housing that is in oversupply in Christchurch.

³ Property declines at more leisurely pace, Debbie Jamieson, Stuff, April 12,2023 https://www.stuff.co.nz/life-style/homed/housing-affordability/131737771/property-declines-continue-in-south-island-but-at-more-leisurely-pace

The need for immediate densification (more apartments and townhouses) is not demonstrated and the social impacts of building more than we need has not been adequately assessed.

Riccarton landscape architect and New Zealand Institute of Landscape Architects member, Graham H. Densem BA DipLA (Cant) ANZILA, supports this view.

He has told our association that, in Riccarton, densification should happen within a properly researched structure plan that identifies where taller buildings, green space, transport and services should be provided.

Densem supports the concept of a designated Pūtaringamotu-Riccarton area that includes the wider area of Westfield Mall and surrounds, including residential areas and the bush. Such a plan he said would better identify more and less desirable development places.

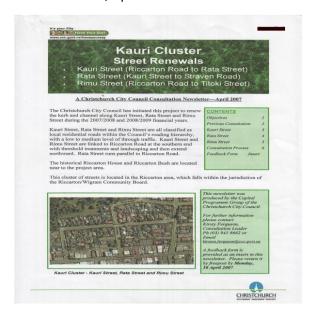
A step towards that, we submit, is to designate the Riccarton Bush Kilmarnock area a Qualifying Matter pending a more cohesive, planned, controlled approach to future development.

APPENDICES

APPENDIX 1 - Pūtaringamotu - Riccarton Bush Heritage Landscape Review Wendy Hoddinott, WSP, 20 Dec 2022



APPENDIX 2 - Kauri Cluster Street Renewals
CCC newsletter, April 2007



APPENDIX 3 - Christchurch Suburban Character Area Assessment

Attachment to evidence by Josephine Schroeder, CCC, to Christchurch Replacement DP Review - Beca Ltd, 17 Jun 2015 [pp12-77]



APPENDIX 4 – Kamo Marsh Landscape Architects' Memorandum in Support

On RBK submission on Plan Change 14, 1 May, 2023





APPENDIX 5 – Citywide Surface Water Flooding Update

Staff report to the city council – Wednesday 5 April, 2023



Pūtaringamotu Riccarton Bush Heritage Landscape Review

20 December 2022 CONFIDENTIAL









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Document Details:

Date: 20 December 2022 Reference: 4c-0001.00

Status: Final

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Contents

1	Exe	cutive Summary	5
2	Introduction		
	2.1	Purpose	7
	2.2	Approach and Methodology	7
	2.3	Author	8
	2.4	Acknowledgements	8
	2.5	Abbreviations	8
	2.6	The Site and Setting	9
	2.7	Heritage Status	12
	2.8	Scope, Limitations and Clarifications	14
	2.9	Photographs	14
3	Legislative Framework		
	3.1	Statutory obligations	15
	3.2	Non-Statutory Framework	16
4	Existing Heritage Environment		
	4.1	Heritage Landscape Values of Pūtaringamotu Riccarton Bush and Setting	19
	4.2	Physical Description	21
5	Heritage Review and Recommendations		
	5.1	Heritage Landscape Values and Visual Effects	27
	5.2	Ecological Values	36
	5.3	Summary of Key Heritage Landscape Values/Effects	37
	5.4	Recommendations for Future Research	39
6	Con	clusion	39
7	Ribl	ingraphy & Deferences	<u>4</u> 1

List of Figures

Figure 1: Pūtaringamotu Riccarton Bush, Fendalton, Ōtautahi Christchurch Figure 2: Current zoning of Pūtaringamotu and surrounding streets in the CDP	
Figure 3: Map showing extent of 600m walking catchment for proposed high density development around Riccarton commercial centre (red dashed line) and relative to Riccarton	
Bush. The area within this line proposes intensification of up to 20m (six stories). Other proposed	
qualifying matters are displayedFigure 4: Plan of Riccarton Bush showing Council's Initial proposed interface area. Red area	.
indicates Council's proposed 12m height limit	12
Figure 5: Pūtaringamotu Riccarton Bush and Christchurch City Council listed heritage Items and settings	d
Figure 6: CDP Planning map shows Riccarton Bush as an Outstanding Natural Feature and	
Significant Trees Area. Map also shows the adjacent Grounds of Riccarton House as part of the Outstanding Natural Feature and as an area of Protected Vegetation containing Significant Individual and Park Trees	14
Figure 7: 'Fox, William, 1812-1893, "Riccarton. Messrs Deans' Station. Canterbury.," ourheritage.ac.r	
OUR Heritage, accessed November 15, 2022, https://otago.ourheritage.ac.nz/items/show/5291. C.18482	
Figure 8: 'llam Farm, Riccarton Bush' by Frederick Aloysius Weld, Dec. 1852	
Figure 9: Drawing by Edmund Norman of the Canterbury Plains showing the two areas of native bush at Riccarton and Papanui the distance, c.1855. Riccarton Bush in the distance is to the left Figure 10: Representative viewpoints of Pūtaringamotu from surrounding streets and further	
away. Pink dashed line identifies streets with views of Riccarton Bush; green line depicts views	
from within the bush, blue line identifies views of Riccarton Grounds and Former Farm Building	S
from surrounding streets, brown line depicts viewpoints from Riccarton Grounds and Riccarton	. ,
House. Numbered viewpoints correspond with figure numbers and images below2 Figure 11: View north along Rimu Street towards Riccarton Grounds, an inseparable component	
of the bush reserve2	
Figure 12: View northwest towards Pūtaringamotu along the skyline from Rata Street2	
	25
Figure 14: Views north of Riccarton Bush across the skyline from the south end of Kauri Street2	25
Figure 15: Riccarton Bush across the skyline looking north, from the footpath opposite 142 Riccarton Road	25
Figure 16: View of Riccarton Bush looking north, forms the backdrop to motels on Riccarton Roa	
(currently Medium Density Residential)2	
Figure 17: Southwest boundary of Riccarton Bush viewed from Riccarton Road footpath, the	
backdrop to St Theresa's School	26
Figure 18: Distant views of the west boundary to Pūtaringamotu from the footpath outside St Theresa of Lisieux Church, Puriri Street2	26
Figure 19: View towards Pūtaringamotu visible from Riccarton Road behind St Theresa of Lisieux Church, Puriri Street	<
Figure 20: Rata Street looking northwest towards Pūtaringamotu Riccarton Bush, with graphic	
overlay showing possible apartment configuration under the existing CDP height limit (8m)2	27
Figure 21: Rata Street looking northwest towards Pūtaringamotu Riccarton Bush, with graphic	
overlay showing possible apartment configuration under a proposal of 12m height limit within the Riccarton Bush interface	28
Figure 22: Rata Street looking northwest towards Pūtaringamotu Riccarton Bush, with graphic	
overlay showing 20m height limit and possible apartment configuration under the NPS High Density Residential Standards2	28
Figure 23: View from corner of Puriri and Hinau Street looking southeast towards Pūtaringamoti	
Riccarton Bush, with graphic overlay showing possible apartment configuration and height limi (8m) under the existing CDP	29
Figure 24: View from corner of Puriri and Hinau Street looking southeast towards Pūtaringamot Riccarton Bush, with graphic overlay showing possible apartment configuration and height limi	t
(12m) under MDRS.	
Figure 25: View along Ngahere Street looking southeast towards Pūtaringamotu Riccarton Bush with graphic overlay showing possible apartment configuration and height limit (8m) under the	9
existing CDP	51

Figure 26: View along Ngahere Street looking southeast towards Pūtaringamotu Riccarton Bu	ısh,
with graphic overlay showing possible apartment configuration and height limit (12m) under MDRS	
Figure 27: View along Riccarton Road looking northwest towards Pūtaringamotu Riccarton Buwith graphic overlay showing possible apartment configuration and height limit (8m) under the existing CDP	ush,
Figure 28 View along Ngahere Street looking southeast towards Pūtaringamotu Riccarton Bus	
with graphic overlay showing possible apartment configuration and height limit (12m) under MDRS	32
Figure 29: View along Riccarton Road looking southeast towards Pūtaringamotu Riccarton Bu with graphic overlay showing possible apartment configuration and height limit (20m) under NPS	ısh, 33
Figure 30: View along Kahu Road looking north towards Riccarton Grounds, with graphic over	-
showing possible apartment configuration and height limit (8m) under the existing CDP	33
Figure 31 View along Kahu Road looking southeast towards Riccarton Grounds, with graphic	7 /
overlay showing possible apartment configuration and height limit (12m) under MDRS	54
Figure 32: View along Kahu Road looking southeast towards Riccarton Grounds, with graphic overlay showing possible apartment configuration and height limit (20m) under NPS	7/.
Figure 33: Recommended modifications and additions to Christchurch City Council proposed	54
protection and setbacks for Pūtaringamotu	35
Figure 34: View of Riccarton Bush through driveways of 16 and 18 Puriri Street	
Figure 35: View southeast towards Pūtaringamotu. The Bush is clearly seen along the skyline	
	45
Figure 36: View of Riccarton Bush opposite 95 and 97 Totara Street, where a 12m and 20m heigh	ght
limit is likely to obscure views of Riccarton Bush.	
Figure 37: View of Riccarton Bush along the skyline from Totara Street	45
Figure 38: View southeast towards Riccarton Bush across the rooftops of 1 – 9 Ngahere St. Photograph taken from the corner of Totara and Ngahere Streets	/.5
Figure 39: View towards 15 and 17 Ngahere Street, which are currently within interface area, bu	
MDRS of 12m height would likely obscure views to the bush	
Figure 40: View towards Pūtaringamotu from the corner of Miro and Hinau Streets looking	
southeast	46
Figure 41: View along the skyline from residential properties in Hinau StreetStreet	46
Figure 42: View towards Pūtaringamotu from the corner of Puriri and Hinau Streets looking southeast	46
Figure 43: View looking northeast towards Riccarton House (right) and 1-2 storey dwellings	
across the Ōtākaro Avon River	
Figure 44: View looking northwest alongside Riccarton House (left) towards 1-2 storey dwelling currently screened by native vegetation	
Figure 45: View looking northwest along Riccarton Grounds pathway/cycleway. Ōtākaro Avon	/
River to the right	
Figure 46: View towards housing along Kahu Road from Riccarton Grounds. Potential for 20m	(six
stories) with proposed intensification for this area	
Figure 47: Former farm buildings on Kahu Road (indicated) could be easily overwhelmed by	
three or six storey housing along Kahu Road. View looking northeast	
Figure 48: Riccarton Grounds (left), Kahu Road and proposed residential area for intensification (right) to 20m.	
Figure 49: Riccarton Bush visible from Riccarton commercial area (Rimu Street)	40 48
Figure 50: Riccarton Bush from the rooftop of Riccarton Mall	
Figure 51: Riccarton Bush is clearly visible as a familiar landmark some distance away, as viewe	
from the length of Matipo Street (looking north) as far away as Blenheim Road	
Figure 52: View of Riccarton Bush from within, looking south on Te Ara Kahikatea Track. Views	
the outside are obscured, but some areas are less dense than othersothers	
Figure 53: View from within Riccarton Bush looking west from Te Ara Kahikatea Track	
Figure 54: View from within Riccarton Bush looking south towards maintenance/emergency e	
	50

Project Number: 4c-0001.00 Pūtaringamotu Riccarton Bush Heritage Landscape Review

List of Tables

Disclaimers and Limitations

This report ('Report') has been prepared by WSP exclusively for Christchurch City Council ('Client') to provide heritage advice to Council's proposed planning approach to limiting intensification adjacent to Pūtaringamotu Riccarton Bush ('Purpose'). The findings in this Report are based on and are subject to the assumptions specified in the Report and Offer of Services dated 29 September 2022. WSP accepts no liability whatsoever for any reliance on or use of this Report, in whole or in part, for any use or purpose other than the Purpose or any use or reliance on the Report by any third party.

1 Executive Summary

Pūtaringamotu¹ Riccarton Bush is located in Riccarton, Christchurch. This podocarp forest is the last remaining remnant on the low Canterbury Plains and one of the oldest and best documented protected natural areas in Aotearoa. The names Pūtaringamotu and Riccarton Bush have been used interchangeably throughout this report to indicate that this is a place containing both Māori and Pākehā values.

Riccarton Bush is scheduled in the Christchurch District Plan as a Highly Significant item (#647) and as a Site of Ecological Significance (site number SES/LP/4). Several structures and settings associated with and close to Pūtaringamotu are scheduled in the CDP and listed with Heritage New Zealand Pouhere Taonga (HNZPT). As component features of Deans Estate, they are considered part of a group. These features include:

- Riccarton Grounds: HNZPT Category 1 (#1868) and CDP Highly Significant (#1315)
- Former Dwelling and Setting, Deans Cottage: Category 1 (#3679) and CDP Highly Significant (#307 and #621)
- Former Dwelling and Setting, Riccarton: Category 1 (#1868) and CDP Highly Significant (#306 and #621)
- Former Riccarton Farm Buildings and Setting: CDP Significant (#1291 and #215)

Pūtaringamotu is a remnant kahikatea floodplain forest, the only original area of native bush remaining in Ōtautahi Christchurch. It is a well-known forest remnant across wider suburban Christchurch and its distinctive tall podocarp trees have historically stood out across the flat Canterbury Plains. Pūtaringamotu is a very early example in Aotearoa of a natural area that was offered formal protection through the Riccarton Bush Act in 1914 and is significant for its association with many of Canterbury's pioneer settlers and early businessmen/pastoralists, particularly the Deans families. The bush displays a wide diversity of native flora and fauna and is a defining element and tangible link to the early layout of the Deans property, Deans cottage, Riccarton House and Grounds and the Deans former farm buildings. The grounds of Riccarton House are an inseparable complement to Pūtaringamotu, providing the contextual and ornamental setting for all these listed heritage features.

Christchurch City Council has been directed by central government – via the National Policy Statement on Urban Development and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act – to enable more housing development within the city's existing footprint. The heritage advice provided is related to the effectiveness of the Council's proposed planning overlay to protect Pākehā/European heritage and landscape values of Pūtaringamotu from the impacts of intensification and identifies additional sites and further measures to help protect the identified heritage landscape values of the site.

The setting of Pūtaringamotu Riccarton Bush is an integral part of its heritage significance and requires protection from loss of integrity and definition. This includes the historic spaces, views, connections and relationships between Riccarton Bush, adjoining historic places and boundaries that, through intensification, have the potential to negatively impact the heritage values and experiential qualities of Riccarton Bush.

Despite Council's initial proposed reduction in the height of buildings from a 20m height to 12m, adverse visual effects still arise from Council's proposed height limits for buildings adjacent to Pūtaringamotu. The likely effects of these limits are modelled within this report. In addition, Medium Density Residential Development adjacent to Riccarton House and High Density Residential Development opposite Riccarton Grounds and the former Deans farm buildings on Boys High School grounds, weaken the connection of these heritage features with their setting.

¹ The name Pūtaringamotu means either the place of an echo or the severed ear, the latter being a metaphoric expression referring to 'bush isolated from the rest'.

Project Number: 4c-0001.00 Pūtaringamotu Riccarton Bush Heritage Landscape Review

This heritage review finds that adverse effects on Pūtaringamotu and Setting are therefore not mitigated by the previously proposed planning approach. The proposed height limits have the potential to reduce the experience of residents, passers-by and views further afield, through obscuring sightlines of the bush. Recommendations include retaining the existing Residential Suburban Zone (up to 2 storeys), Residential Medium Density and Special Purpose (School) Zones adjacent to Riccarton Bush and Riccarton Grounds, with additional sites included in Council's proposed interface.

2 Introduction

2.1 Purpose

This report has been prepared to review Christchurch City Council's planning approach to the properties surrounding Pūtaringamotu Riccarton Bush, relative to central government's National Policy Statement on Urban Development 2020 (NPS-UD) and the Resource Management (Enabling Housing Supply) Amendment Act 2021. Christchurch City Council has voted against notifying the proposed Housing and Business Choice Plan Change (PC14), requesting a bespoke intensification response for Christchurch.

Christchurch City Council has identified that properties surrounding Pūtaringamotu may be subject to qualifying matters relating to the heritage and open space values of Pūtaringamotu and as a result Council's Plan Change proposes to make development to High and Medium Density Residential Standards (HDRS and MDRS) less enabling in the area surrounding Riccarton Bush.

The heritage advice provided is related to the effectiveness of Council's proposed planning framework to safeguard Pākehā/European heritage and landscape values of Riccarton Bush from the impacts of intensification through the NPS-UD and the MDRS. This review identifies additional sites and further measures needed to help protect the identified heritage landscape values of the site and setting.

2.2 Approach and Methodology

This heritage review has considered existing heritage reports² and Statements of Significance³ that identify the heritage, landscape and ecological values of Pūtaringamotu as well as community submissions on Council's proposed planning approach (PC14) to this area.

Information regarding protected resources and heritage has been sourced from the Christchurch District Plan. Heritage assessments for Riccarton Bush and scheduled items around Pūtaringamotu were also supplied by Council staff, as was community feedback on Council Planners' draft proposal for the Housing and Business Choice Plan Change (PC14), from April 2022, relating to Riccarton.

Information has also been sourced from HNZPT's online List Entry for individual structures and settings within the area, which contain historic information on the items themselves as well as a collective history on Pūtaringamotu Riccarton Bush as a whole.

Site visits were carried out on 10 and 17 October and 25 November 2022 by Wendy Hoddinott, Principal Heritage Landscape Architect from WSP. The areas and views were surveyed from:

- the perimeter streets surrounding Pūtaringamotu including Rimu St, Rata St, Kauri St, Riccarton Rd, Puriri St, Totara St, Ngahere St, Miro St, Hinau St, Kahu Rd, Girvan St and from Kotare St.
- Matipo Street and Riccarton Mall rooftop.
- the pedestrian/cycle path through Riccarton Grounds.
- Te Ara Kahikatea / Kahikatea Track within Riccarton Bush.
- listed and scheduled buildings within the extent of Riccarton Bush and Setting.

Site visits were also carried out by Landscape Architect Lawrence Elliott from WSP, with modelling undertaken by both Lawrence and Alex Wierzbicki of WSP, to demonstrate the impact of potential building heights from key viewpoints along adjacent streets. Photographs of

² Beaumont, L. (2009), Conservation Report Riccarton House: Landscape, prepared for Christchurch City Council.

³ HID 306.pdf (ccc.govt.nz)

Project Number: 4c-0001.00 Pūtaringamotu Riccarton Bush Heritage Landscape Review

representative views were taken with a 50mm focal length lens camera which was wide enough to depict perspective and context. Graphic representations of buildings depicting potential height limits and setbacks were scaled in AutoCAD and located accurately using cadastral maps. Each graphic was then overlaid onto photographs of representative viewpoints in SketchUp.

2.3 Author

This document was prepared by Dr Wendy Hoddinott, Principal Heritage Landscape Architect at WSP. Graphic representations were prepared by Lawrence Elliott, Alex Wierzbicki and John Lonink.

2.4 Acknowledgements

The following people have supplied historic information, planning resources and other forms of assistance:

Lawrence Elliott, Landscape Architect, WSP
Ike Kleynbos, Principal Advisor, Planning, Christchurch City Council
Kirk Lightbody, Policy Planner, Christchurch City Council
John Lonink, Principal Urban Designer, WSP
Alex Wierzbicki, Graduate Urban Designer, WSP
Amanda Ohs, Senior Heritage Advisor, Christchurch City Council

2.5 Abbreviations

CDP Christchurch District Plan

HNZPT Heritage New Zealand Pouhere Taonga MDRS Medium Density Residential Standards

NPS – UD National Policy Statement on Urban Development

PC14 Plan Change 14

2.6 The Site and Setting

2.6.1 Location of the Site and Setting

Pūtaringamotu is located in the Christchurch suburb of Riccarton and is the last remaining representative remnant of podocarp forest on the low Canterbury Plains. It is also one of the oldest and best documented protected natural areas in Aotearoa. Pūtaringamotu comprises 7.8 hectares of kahikatea floodplain forest, part of a wider 12-hectare reserve, 3.5 km from Ōtautahi's city centre. The bush sits adjacent to the Riccarton Grounds, the ornamental gardens associated with two historic dwellings - Riccarton House and Deans Cottage. The former Deans Farm buildings and setting on the opposite side of Kahu Road forms part of the wider setting. The site is bordered by the Ōtākaro / Avon River and is set within a residential area containing a mix of character housing from the 1920s and 1930s and more recent infill development. The St Theresa's School and St Theresa of Lisieux Church border the southwest boundary of Riccarton Bush and several motels abut the south boundary along Riccarton Road. Pūtaringamotu lies very close to the commercial centre of Riccarton and Riccarton Mall.



Figure 1: Pūtaringamotu Riccarton Bush, Fendalton, Ōtautahi Christchurch. Source: Christchurch City Council, 2022.

2.6.2 Legal Description

Pūtaringamotu has a legal street address of 16 Kahu Road and is owned by Christchurch City Council. The bush is designated as an Open Natural Space Zone in the Christchurch District Plan (Figure 2) with the surrounding properties zoned Residential Suburban, Residential Medium Density and Specific Purpose (School).

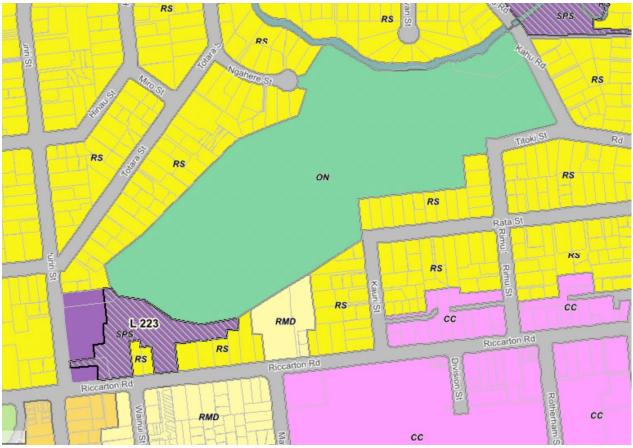


Figure 2: Current zoning of Pūtaringamotu and surrounding streets in the CDP. Source: Christchurch City Council, 2022.

Under direction of the NPS, without considering any qualifying matters, intensification around the majority of Pūtaringamotu would be enabled up to a height of 20m (six stories) (Figure 3). This level of intensification is due to the proximity of the site to the Riccarton commercial centre, and in accordance with Policy 3(d) of the National Policy Statement for Urban Development (NPS-UD). Intensification would however be limited around the northern perimeter of the bush by restrictions associated with the airport noise contour. For this area, Medium Residential Density (12m height restriction) is proposed. Figure 3 shows the extent of the walking catchment for proposed high density development around Riccarton commercial centre (red dashed line).

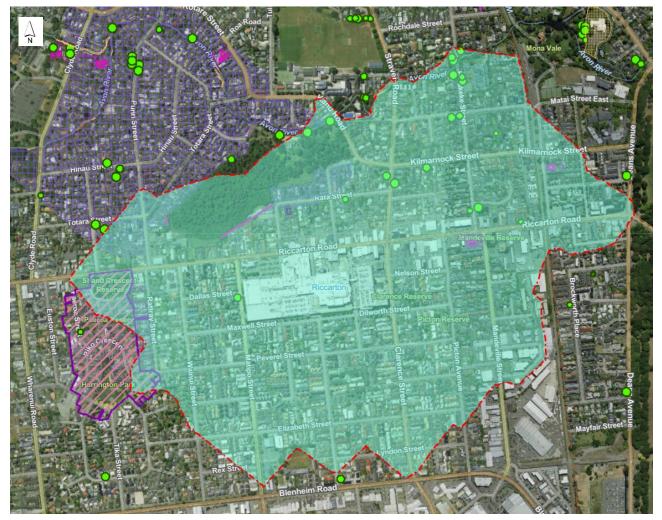


Figure 3: Map showing extent of 600m walking catchment for proposed high density development around Riccarton commercial centre (red dashed line) and relative to Riccarton Bush. The area within this line proposes intensification of up to 20m (six stories). Other proposed qualifying matters are displayed. Source: Christchurch City Council, 2022.

2.6.3 Extent of the Site Considered

This heritage review considers the land parcels and surrounding streets adjacent to Pūtaringamotu and its setting as they relate to the heritage values of Riccarton Bush and also views from further away. In particular, this heritage review considers Council's draft proposed interface area (Figure 4) which proposes a 12m height limit to properties surrounding Riccarton Bush (area shaded red) and the potential for additional sites to further protect heritage values of the bush. Council's intention is to test the adequacy of their draft response and whether additional protection is needed to safeguard the heritage landscape status of the site and surrounds.



Figure 4: Plan of Riccarton Bush showing Council's Initial proposed interface area. Red area indicates Council's proposed 12m height limit.

2.7 Heritage Status

2.7.1 Heritage New Zealand Pouhere Taonga (HNZPT)

Riccarton Bush is listed as a Category 1 Historic Place (#660) with Heritage New Zealand Pouhere Taonga (HNZPT). Category 1 Historic Places are defined as being of special or outstanding historical or cultural significance or value and Category 2 being.

A high concentration of HNZPT listed structures and settings are within the immediate area and intrinsically related to Riccarton Bush. These include:

- Riccarton Grounds (#1868, Category 1)
- Former Dwelling and Setting, Deans Cottage (#3679, Category 1)
- Former Dwelling and Setting, Riccarton (#1868, Category 1)

2.7.2 Christchurch City Council

Pūtaringamotu Riccarton Bush is also scheduled as a Highly Significant heritage item (#647) in the Christchurch District Plan (CDP).

Highly Significant items listed within the CDP have the following attributes:

- Meet at least one of the identified Christchurch City Council heritage values⁴ at a highly significant level; and
- Be of high overall significance to the Christchurch District (and may also be of significance nationally or internationally) because it conveys important aspects of the Christchurch District's cultural and historical themes and activities, and thereby makes a strong contribution to the Christchurch District's sense of place and identity; and
- Have a high degree of authenticity (based on physical and documentary evidence); and

⁴ Historical and Social Value, Cultural and Spiritual Value, Architectural and Aesthetic Value, Technological and Craftsmanship Value, Archaeological and Scientific Value.

• Have a high degree of integrity (particularly whole or intact heritage fabric and heritage values).

In addition to this, Pūtaringamotu and Riccarton Grounds are protected as Outstanding Natural Features. Riccarton Bush is identified as a Significant Trees Area and many Significant Individual Trees and Significant Park Trees in Riccarton Grounds are identified in the CDP.

Riccarton Bush is also identified in the CDP as a Site of Ecological Significance (site number SES/LP/4). The site is ecologically significant because it meets the representativeness (criteria 1 & 2), rarity/distinctiveness (criteria 3, 4 & 6), diversity and pattern (criterion 7) and ecological context criteria (criterion 10).

A number of structures and settings immediately adjacent and close to Pūtaringamotu are scheduled in the CDP (Figure 5). These include:

- Riccarton Grounds (16 Kahu Road, Highly Significant item #1315)
- Former Dwelling and Setting, Deans Cottage (16 Kahu Road, Highly Significant, Item #307)
- Former Dwelling and Setting, Riccarton (16 Kahu Road, Highly Significant item #306, Highly Significant)
- Former Riccarton Farm Buildings and Setting (39 Kahu Road, Significant items #1291)

The above features are considered part of a group, that is they are all part of the original Dean's Estate.



Figure 5: Pūtaringamotu Riccarton Bush and Christchurch City Council listed heritage Items and settings. Source: Christchurch City Council, 2022.

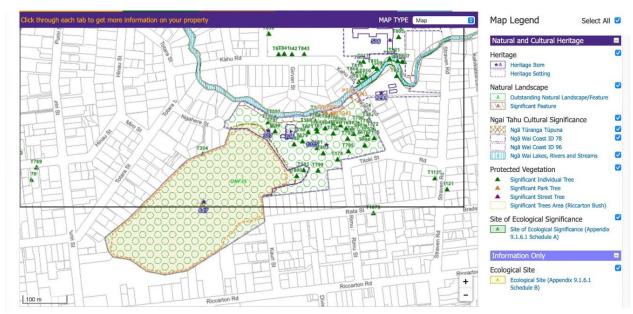


Figure 6: CDP Planning map shows Riccarton Bush as an Outstanding Natural Feature and Significant Trees Area. Map also shows the adjacent Grounds of Riccarton House as part of the Outstanding Natural Feature and as an area of Protected Vegetation containing Significant Individual and Park Trees.

Source: Christchurch City Council, 2022.

2.8 Scope, Limitations and Clarifications

The heritage advice requested is related to the effectiveness of Council's proposed planning overlay to protect Pākehā/ European heritage values and landscape values of Pūtaringamotu from the impacts of intensification. A comprehensive heritage landscape values assessment of the bush was not required at this time. Advice regarding tangata whenua values of the bush, and the potential for impacts from adjacent intensification has been sought separately by the Council through Mahaanui Kurataiao Ltd (MKT).

2.9 Photographs

All photographs in this document were taken by the author during the site visits mentioned above. All other images have been appropriately acknowledged.

3 Legislative Framework

This section provides an overview of the statutory documents that apply to Pūtaringamotu Riccarton Bush and its wider setting at the time of preparing this heritage review.

3.1 Statutory obligations

3.1.1 The Resource Management Act (RMA) 1991

The purpose of the Resource Management Act (RMA) is to promote the sustainable management of natural and physical resources. Under Section 6 of the Act, the protection of historic heritage from inappropriate subdivision, use, and development is identified as a matter of national importance.

Other sections of the Act relevant to Pūtaringamotu include Section 6 (b) as an outstanding natural feature, (c) as an area of significant indigenous flora and fauna and (e) as a site of importance to the relationship of Māori with their ancestral lands, sites, and other taonga.

Subpart 3 of the RMA requires territorial and regional authorities to prepare district and regional plans that set out objectives, policies, and rules to assist them in carrying out their functions under the Act.

3.1.2 National Policy Statement for Urban Development (NPS-UD)

Policy 3 and 4 of the National Policy Statement for Urban Development (NPS-UD) note that Riccarton is considered under Policy 3(d), providing a commensurate response to the centre being classified as a 'Town Centre Zone' and also falling in a sub-category that Council has defined of larger Town Centres alongside Hornby & Papanui.

3.1.3 Canterbury Regional Policy Statement (Environment Canterbury, 2013)

The Operative Canterbury Regional Policy Statement (CRPS) has been in place since 2013 and was republished in October 2020. The CRPS states the following in regard to historic heritage in the region:

Historic heritage contributes to Canterbury's unique identity. Canterbury's various cultures each have sites and areas, both natural and modified and including areas within past and present settlements, which have particular cultural and heritage value. The contribution of such sites, and their associated values, have on cultural well-being are often not recognised or appreciated until they are lost forever.

The diversity of heritage items, places, and areas, including historic cultural and historic heritage landscapes, and the cultures and eras they represent, contribute to the regional sense of identity. The cumulative loss of these heritage items, places and areas and their values can diminish that sense of identity.

3.1.4 Christchurch District Plan (CDP)

To give effect to its responsibilities under the Resource Management Act 1991 (RMA), the Christchurch City Council is required to prepare, implement, and administer a District Plan. The CDP uses a number of regulatory layers relative to heritage buildings, places and objects to ensure the purpose of the RMA is met. Issues and policies regarding the identification, management and protection of heritage items are identified in Chapter 9.3 of the Plan. This particular chapter recognises the important contribution historic heritage makes to the district's distinctive character and is to be achieved through various policies and associated rules. Heritage items are protected under the rules established in Chapters 9.3.4 – 9.3.6.

3.1.5 Heritage New Zealand Pouhere Taonga Act 2014

The purpose of the Heritage New Zealand Pouhere Taonga Act 2014 (HNZPTA) is 'to promote the identification, protection, preservation, and conservation of the historical and cultural heritage of New Zealand. Under Part 4 of the Act, HNZPT are required to maintain the New Zealand Heritage List/Rārangi Kōrero.

Although Riccarton Bush, Riccarton Grounds, the Former Dwelling and Setting and Deans Cottage are included on the New Zealand Heritage List, HNZPT does not have statutory authority to provide protection for the structures.

However, as a Heritage Protection Authority, HNZPT may place a Heritage Order on the structures and sites under Part 8 of the RMA. It also has the statutory authority over the treatment of the place as an Archaeological Site as the area is known to have been occupied prior to 1900.

3.1.6 Riccarton Bush Trust Act 1914 and 1947 Amendment

The name 'Riccarton Bush' was established as a result of this Act, requiring that it "be used and kept for all time for the preservation and cultivation of trees and plants indigenous to New Zealand". The Act was revised in 2012 to in effect 'tidy up' the 1947 Riccarton Bush Act and the governance arrangements that were put in place for the board for the Riccarton Bush trustees. It better defines the Board's functions to provide for the continuation of their work, and to enhance preservation of Pūtaringamotu.⁵

3.2 Non-Statutory Framework

In addition to the statutory documents outlined above, non-statutory guidelines prepared by established heritage conservation organisations provide direction on how places of cultural and natural heritage value should be managed. This section lists those that are particularly relevant.

3.2.1 ICOMOS NZ Charter for the Conservation of Places of Cultural Heritage Value 2010

The ICOMOS NZ Charter is prepared by ICOMOS New Zealand, a branch of the International Council on Monuments and Sites, a professional association that works for the conservation and protection of cultural heritage places worldwide.

The Charter provides a set of policies to guide the conservation and adaptation of places of cultural heritage value; and is provided in full in Appendix A.

3.2.2 Historic Gardens (The Florence Charter 1981)

The ICOMOS – IFLA (International Federation of Landscape Architects) International Committee for Historic Gardens was registered by ICOMOS as the guiding standard for the preservation of historic gardens. This Charter recognises gardens as historic monuments with their own special character and provides a set of principles where both natural and cultural elements are taken into consideration regarding conservation (Appendix B). All decisions relating to the conservation of the place should be made according to those outlined in the Charter.

3.2.3 Christchurch Heritage Strategy 2019 – 2029

The Christchurch Heritage Strategy is intended to assist Council, in partnership with mana whenua, to provide for the city's taonga. It recognises that Council has a leadership role in ensuring the recognition, protection, and celebration of heritage.

⁵ Riccarton Bush Amendment Act 2012 No 4, Local Act 10 New heading and sections 21 to 28 substituted – New Zealand Legislation

Project Number: 4c-0001.00 Pūtaringamotu Riccarton Bush Heritage Landscape Review

The protection of heritage through best practice conservation, traditional knowledge, support, and stewardship is a key outcome of the Strategy⁶ which is based on a set of values and principles that include:

Heritage Conservation Principles – The Council will implement this strategy in alignment with best practice conservation management of heritage places and the safeguarding of intangible heritage.

The first goal of the Strategy is to ensure that the city's heritage is accessible to all and is shared and celebrated. Actions to achieve this goal include celebrating and promoting Council's role as heritage champion through modelling best practice heritage asset management.⁷

Goal 4, Actions la and lb of Council's Heritage Strategy is also of relevance to this heritage review. Action la "seek[s] to develop the strongest possible regulatory framework to ensure effective protection of significant and highly significant heritage places". Action lb Identifies Council's intention to "seek to increase the scope and breadth of regulatory and non-regulatory protection measures which could achieve recognition of [...] cultural landscapes" among other heritage places and features. 9

3.2.4 HNZPT Sustainable Management of Historic Heritage Guidance Series

The Sustainable Management of Historic Heritage Guidance Series includes several Information Sheets to guide the management of heritage buildings and places, including:

- Information Sheet 1: Principles for Assessing Appropriate or Inappropriate Subdivision, Use and Development on Historic Heritage Values.
- Information Sheet 16: Assessing Impacts on the Surroundings associated with Historic Heritage

3.2.5 Sustainable Management of Historic Heritage Guidance Information

Sheet 1: Principles for Assessing Appropriate or Inappropriate Subdivision, Use and Development on Historic Heritage Values.

The relevant sections of this document are:

6. Respect for physical material

The degree to which interventions involve the least possible loss of heritage significance and the least loss of material of heritage value. Including those arising from irreversible or cumulative effects.

7. Understanding Significance

Whether the values of the place are clearly understood before decisions are taken that may result in change. Decision-making, where change is being contemplated, should take into account all relevant values, cultural knowledge and disciplines. Understanding significance should be assisted by methods such as the preparation of heritage assessments and conservation plans.

8. Respect for Contents, Curtilage and Setting

The extent to which interventions respect the contents and surroundings associated with the place. This may be achieved by ensuring, for example, that any alterations and additions to buildings, and new adjacent building, are compatible in terms of design, proportions, scale and materials.

⁶ Christchurch Heritage Strategy 2019 – 2029, p.31.

⁷ Christchurch Heritage Strategy 2019-2020, p35.

⁸ Christchurch Heritage Strategy 2019-2020, p39.

⁹ Christchurch Heritage Strategy 2019-2020, p39.

Sheet 16: Assessing Impacts in Surroundings Associated with Historic Heritage

The relevant sections of this document are:

Principles

Assessing the significance and impacts on surroundings will require an understanding of the significance of the original relationship of the heritage item to its site and locality, adequacy of setting, visual catchments and corridors, and the need for buffer areas to screen unsympathetic development.

General .

- The original relationship of the heritage item to its site and locality should be retained. All the main structures associated with the heritage item (for example, homestead, garden, stables, etc.) should be retained in single ownership.
- Where a historic place has landmark values, the proposed activity should not be visually dominating or distract from the landmark qualities of the historic place. The relative scale of the activity is an important consideration.
- The proposed activity should provide for an adequate setting for the heritage item, enabling its heritage significance to be maintained. The significance and integrity of the setting should be identified. Well-preserved, authentic, essential, and substantial settings should be retained and protected.
- The proposed activity should provide for adequate visual catchments, vistas and sightlines or corridors to the heritage item from major viewing points and from the item to outside elements with which it has important visual or functional relationships.

3.2.6 Te Tiriti o Waitangi Principles

The Treaty of Waitangi, signed in 1840 between Māori and the British Crown, is not law, but since 1975 many New Zealand laws have referred to the 'principles' of the treaty. There is no final and complete list of treaty principles. Instead, official documents have referred to treaty principles in general terms, without including the actual treaty text, because the English and Māori versions of the treaty are not direct translations of each other, so difficulties arise in interpretation.178 In 1983 the Waitangi Tribunal stated, 'The spirit of the Treaty transcends the sum total of its component written words and puts literal or narrow interpretations out of place.'179 In order to apply the treaty in a context relevant to the present day, the Waitangi Tribunal and the courts have considered the broader intentions, sentiments, and aims of the treaty, and identified its principles on a case-by case basis. Three of the key principles, and a brief description of each principle, are outlined below:

- Partnership interactions between the Treaty partners must be based on mutual good faith, cooperation, tolerance, honesty, and respect
- **Protection** government must protect whakapapa, cultural practices and taonga, including protocols, customs, and language
- Participation this principle secures active and equitable participation by tangata whenua

4 Existing Heritage Environment

4.1 Heritage Landscape Values of Pūtaringamotu Riccarton Bush and Setting

Pūtaringamotu Riccarton Bush, along with the adjacent Riccarton House Grounds, Deans Cottage, Riccarton House and Former Riccarton Farm Buildings and Setting are scheduled heritage items. While these listings offer some protection from development adjacent to the bush (earthworks and new buildings), protection does not exist on all sides.

The existing heritage environment of Pūtaringamotu Riccarton Bush and its key heritage values have been described in detail in the Christchurch City Council Statements of Heritage Significance¹⁰ and individual conservation plans.¹¹ These documents give full explanations of significance under various assessment criteria as the basis for listing or registration.¹² These heritage landscape values are summarised below.

4.1.1 Summary Heritage Landscape Values

Riccarton Bush is one of the oldest and best documented protected natural area in Aotearoa. As a remnant kahikatea floodplain forest, Pūtaringamotu has survived natural catastrophes and the impact of two human cultures and is now the only original area of native bush remaining in Ōtautahi Christchurch.

A large part of Pūtaringamotu was gifted to the people of Canterbury in 1914 by the Deans Family and is a very early example in Aotearoa of a natural area offered formal protection through the Riccarton Bush Act. Riccarton Bush is significant for its association with many of Canterbury's pioneer settlers and early businessmen/pastoralists including William, John and Jane Deans, and their families and descendants.

Pūtaringamotu displays a wide diversity of native flora and fauna, the management of which has improved Pūtaringamotu's integrity as a native forest remnant through activities such as propagating plants from seed sourced entirely from the bush. Riccarton Bush is a defining element in the city and tangible link to the early layout of the Dean's property, Dean's Cottage and Riccarton House and grounds and other features related to the former Deans Estate such as the brick farm buildings (now Christchurch Boys' High School grounds). The grounds of Riccarton House are an inseparable complement to Pūtaringamotu, providing the contextual and ornamental setting for these listed heritage features.

Riccarton Bush has a strong physical relationship to the Ōtākaro Avon River and as the immediate backdrop to Riccarton House and Deans Cottage. It is a well-known forest remnant across wider suburban Christchurch with its distinctive tall podocarp trees which historically have stood out within the flat Canterbury Plains. Many artworks from the 1850s have recorded Riccarton Bush as a feature (e.g. Figure 7, Figure 8, Figure 9) and Pūtaringamotu remains a distinctive physical landmark in the city today.

¹⁰ HID 306.pdf (ccc.govt.nz)

¹¹ Beaumont, L. (2009) Conservation Report Riccarton House: Landscape, prepared for Christchurch City Council.

¹² CCC Draft Heritage Significance Criteria (Appendix 10.3)



Figure 7: 'Fox, William, 1812-1893, "Riccarton. Messrs Deans' Station. Canterbury.," ourheritage.ac.nz | OUR Heritage, accessed November 15, 2022, https://otago.ourheritage.ac.nz/items/show/5291. C.1848.

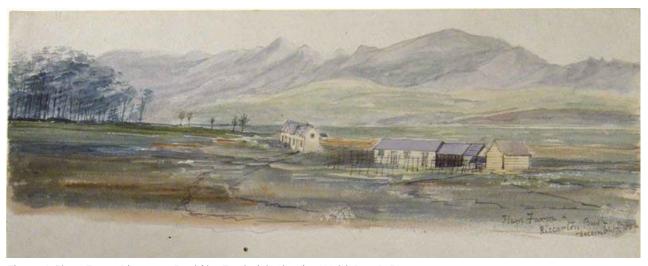


Figure 8: 'llam Farm, Riccarton Bush' by Frederick Aloysius Weld, Dec. 1852. Source: Canterbury Museum



Figure 9: Drawing by Edmund Norman of the Canterbury Plains showing the two areas of native bush at Riccarton and Papanui the distance, c.1855. Riccarton Bush in the distance is to the left.

Source: National Library, https://natlib.govt.nz/records/23051035.

Specific physical features in the landscape representative of Pūtaringamotu's historic values therefore include:

- The bush as a distinctive feature and uninterrupted skyline of tall podocarp forest seen from a number of vantage points around adjacent streets and broader afield (see Section 4.2). Although the city has developed with residential buildings that surround it, Pūtaringamotu remains as a distinctive physical landmark in the city today.
- Riccarton Bush as a defining element in the layout of Deans' Estate and clearly observable as part of a group of heritage elements within a heritage setting.
- Riccarton Grounds as an inseparable part of Riccarton Bush together forming an Outstanding Natural Feature and Significant Tree area.
- Scheduled historic buildings from Deans occupation of the site including Riccarton House and Riccarton Cottage located inside Riccarton Grounds.
- Elements within the surrounding landscape that contribute to the historic legibility of Dean's Estate despite sitting outside the property boundary. These features include the scheduled former farm buildings and associated trees from the Deans cattle farming operation, now part of Boys High School, and remnant plantings ca 1867 which extend from Kahu Street to Straven Road. Boys High School sports ground, formerly known as Deans paddock is also a component landscape feature.
- As part of the original Deans Estate the heritage elements noted above are considered to be part of the same group.

4.2 Physical Description

Setting is defined in the ICOMOS NZ Charter 2010 as, "the area around and/or adjacent to a place of cultural heritage value that is integral to its function, meaning and relationships. Setting includes the structures, outbuildings, features, gardens, curtilage, airspace and accessways forming the spatial context of the place or used in association with the place. Setting also includes cultural landscapes, townscapes and streetscapes, perspectives, views and viewshafts to and form a place; and relationships with other places which contribute to the cultural heritage value of the place. Setting may extend beyond the area defined by legal title and may include a buffer zone necessary for the long-term protection of the cultural heritage value of the place."

Based on historic and physical investigation, the Setting of Pūtaringamotu encompasses Riccarton Grounds and the street blocks surrounding Riccarton Bush, the road and airspace between Pūtaringamotu and the surrounding buildings and streets, based on the visual, social, cultural and historical relationships and functions between all these places.

Project Number: 4c-0001.00 Pūtaringamotu Riccarton Bush Heritage Landscape Review

This description is based on historical investigations of Pūtaringamotu, two site visits that involved walking the perimeter streets of Pūtaringamotu and Riccarton Grounds and the Kahikatea Track within Riccarton Bush itself. The site visits were carried out on the 10th and 17th October and the area walked is shown by the dashed line in Figure 10. Colours represent the different types of view, namely:

- streets and residential properties that immediately surround Riccarton Bush.
- path/cycleway through Riccarton Grounds.
- within Riccarton Bush.
- streets surrounding Riccarton Grounds and adjacent to former Deans' farm buildings.
- distant views

4.2.1 Rimu St – Rata St – Kauri St – Riccarton Rd – Puriri St – Totara St – Ngahere St – Hinau St - Kotare St – Miro St – Hinau St - Kahu Rd

Views of Riccarton Bush are most immediately available from the surrounding streets from the south, west and north of Pūtaringamotu and vary from pockets of native vegetation through and down residential driveway viewshafts to broad expanses of trees above roofs across the skyline.

Other defining elements that relate to the historic heritage of Riccarton Bush include the original single and double storey Californian-style bungalow homes which sit immediately adjacent to the bush in these areas. Many are enhanced by well landscaped gardens with large trees and shrubs. While the overall coherence of this character has been eroded through new infill development that now occupies a greater site area, the quality of the streetscape with grass berms and mature trees, the generous building setbacks and visual relationship to Riccarton Bush all contribute to the visual amenity of the Riccarton Bush Setting.¹³

4.2.2 Te Ara Kahikatea / Kahikatea Track, Riccarton Bush

Riccarton Bush contains dense stands of 600-year kahikatea, amongst a diversity of native flora and fauna. A system of gravel and concrete walking tracks with boardwalks loop through the bush, with the Ōtākaro Avon River bordering the northern edge of the bush boundary.

No buildings external to the bush are visible from the tracks apart from the maintenance exit along the south boundary. Some parts of the bush appear more transparent than others however, particularly along the south and western boundaries of the bush.

4.2.3 Riccarton Grounds

Riccarton House Grounds is an irregularly shaped land holding with pedestrian/cycle access from Kahu Road, in front of Riccarton House, through to Ngahere Street. The Grounds are bounded by the Ōtākaro Avon River on the northern boundary and to the east along Kahu Road and Titoki Streets. Residential properties along Rata Street border its southern boundary and the Riccarton Bush predator fence lies immediately adjacent to its western boundary. The Grounds are highly visible from these surrounding streets, particularly the mature exotic trees which are physically and visually connected with the Ōtākaro Avon River. The river is lined with mature vegetation screening residential properties north of the pedestrian/cycleway opposite Riccarton House.

4.2.4 Kahu Road and Titoki Streets

Kahu and Titoki Streets lie immediately adjacent to Riccarton Grounds with residential properties on both the east and south boundaries of each street respectively. Kahu Road is a busy minor arterial road and it is here that the Deans' late 19th century farm buildings are located, along the natural curve of the Ōtākaro Avon River, now part of Christchurch Boys' High School. The buildings lie adjacent to one and two storey residential housing. Titoki Street to the south is a quieter street, with similar style housing and range of setbacks from the street. The visual

¹³ Beca (2015), Christchurch Suburban Character Area Assessment prepared for Christchurch City Council, Character Area 7: Totara/Hinau/Puriri Assessment.

Project Number: 4c-0001.00 Pūtaringamotu Riccarton Bush Heritage Landscape Review

relationship between Riccarton Grounds and the Former Deans' Farm Buildings and between Riccarton Grounds and the existing scale of residential housing, contributes to the heritage setting. While pockets of Riccarton Bush can be observed along Kahu Road between Tui and Totara Streets, they are less recognisable than those in streets containing a broad backdrop.

4.2.5 Distant views - Matipo Street and Riccarton Mall carpark

The expanse of tall podocarp trees that make up Riccarton Bush is also obvious some distance away. For example, while walking or driving north down Matipo Street, the trees appear as a natural feature across the skyline. Similarly, from Riccarton Mall rooftop carpark the trees can clearly be seen as a natural feature, including the detail of upper trunks not visible from the ground.

4.2.6 Location Plan

Photographs in the following section depict representative viewpoints of Pūtaringamotu's 'visual catchment'. These images help illustrate the existing visibility of the bush from surrounding footpaths and intersections, views experienced from within the bush itself and further away, helping form a baseline for potential effects. Photographs are however static and tend to flatten perspective, so that the entire experience people have of Pūtaringamotu as they move around adjacent streets is not always picked up through photographs.

Figure 10 shows the locations from which photographs were taken. Viewpoints were predominantly chosen where large expanses of forest were visible, to understand the impact on this large expanse as a defining element across the skyline. Viewpoint numbers correspond with figure numbers and photographs below.

Viewpoints most closely related to Riccarton Bush start at Viewpoint 12 and continue to streets that relate more closely to Riccarton Grounds, Riccarton House, the Deans former farm buildings and the setting. Viewpoints 49, 50 and 51 show views of Riccarton Bush from the commercial centre of Riccarton Mall. Viewpoints 11 - 19 are shown immediately below Figure 10, with the remainder viewpoints located within Appendix C.

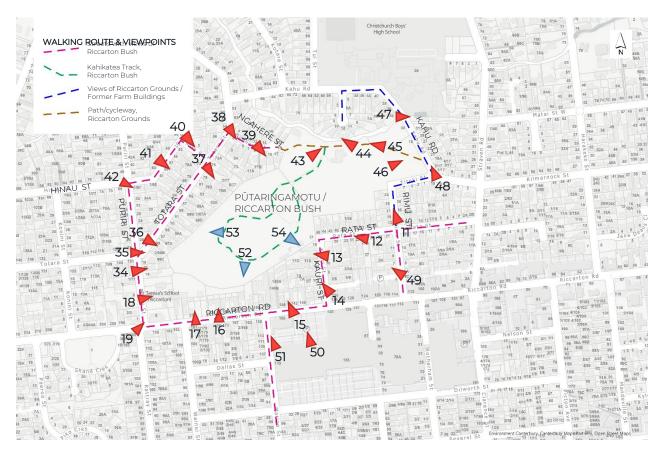


Figure 10: Representative viewpoints of Pūtaringamotu from surrounding streets and further away. Pink dashed line identifies streets with views of Riccarton Bush; green line depicts views from within the bush, blue line identifies views of Riccarton Grounds and Former Farm Buildings from surrounding streets, brown line depicts viewpoints from Riccarton Grounds and Riccarton House. Numbered viewpoints correspond with figure numbers and images below and in Appendix C.

Source: Canterbury Maps 2022 with graphic overlay.

RIMU STREET



Figure 11: View north along Rimu Street towards Riccarton Grounds, an inseparable component of the bush reserve.

RATA STREET



Figure 12: View northwest towards Pūtaringamotu along the skyline from Rata Street.

KAURI STREET



Figure 13: Views northwest towards Riccarton Bush along the skyline from the north end of Kauri Street.

KAURI STREET



Figure 14: Views north of Riccarton Bush across the skyline from the south end of Kauri Street.

RICCARTON ROAD



Figure 15: Riccarton Bush across the skyline looking north, from the footpath opposite 142 Riccarton Road.

RICCARTON ROAD



Figure 16: View of Riccarton Bush looking north, forms the backdrop to motels on Riccarton Road (currently Medium Density Residential).

RICCARTON ROAD



Figure 17: Southwest boundary of Riccarton Bush viewed from Riccarton Road footpath, the backdrop to St Theresa's School.

PURIRI STREET



Figure 18: Distant views of the west boundary to Pūtaringamotu from the footpath outside St Theresa of Lisieux Church, Puriri Street.

CORNER PURIRI STREET & RICCARTON ROAD



Figure 19: View towards Pūtaringamotu visible from Riccarton Road behind St Theresa of Lisieux Church, Puriri Street.

5 Heritage Review and Recommendations

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

5.1 Heritage Landscape Values and Visual Effects

5.1.1 Response to Council's Proposed Interface Sites

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

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

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



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



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



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

Views to Riccarton Bush can also be observed along the driveways and outdoor areas of residential properties (e.g., Figure 34, Figure 36 and Figure 39) which, foregrounded by residential tree canopies, contribute to the experience of Riccarton Bush when walking adjacent streets. If MDRS were enabled in this area, the new built form standards would encourage building footprints that dramatically reduce viewsheds currently available along driveways.

In addition, as photographs demonstrate, views to Riccarton Bush from the street frontage of properties omitted from Council's interface sites in the street blocks surrounding Pūtaringamotu would be obscured if either 20m or 12m height limits were enabled (e.g., Figure 36 – Totara Street, Figure 39 – Ngahere Street).

Modelling below demonstrates further visualisations of representative views, showing existing and potential height limits from other streets surrounding Riccarton Bush under the CDP, MDRS and NPS. Effects of these height limits on Riccarton Grounds and the former Deans farm buildings is also included.



Figure 23: View from *corner of Puriri and Hinau Street* looking southeast towards Pūtaringamotu Riccarton Bush, with graphic overlay showing possible apartment configuration and *height limit (8m) under the existing CDP*.



Figure 24: View from *corner of Puriri and Hinau Street* looking southeast towards Pūtaringamotu Riccarton Bush, with graphic overlay showing possible apartment configuration and *height limit (12m) under MDRS*.



Figure 25: View along **Ngahere Street** looking southeast towards Pūtaringamotu Riccarton Bush, with graphic overlay showing possible apartment configuration and **height limit (8m) under the existing CDP**.



Figure 26: View along **Ngahere Street** looking southeast towards Pūtaringamotu Riccarton Bush, with graphic overlay showing possible apartment configuration and **height limit (12m) under MDRS**.



Figure 27: View along *Riccarton Road* looking northwest towards Pūtaringamotu Riccarton Bush, with graphic overlay showing possible apartment configuration and *height limit (8m) under the existing CDP*.



Figure 28 View along **Ngahere Street** looking southeast towards Pūtaringamotu Riccarton Bush, with graphic overlay showing possible apartment configuration and **height limit (12m) under MDRS**.



Figure 29: View along *Riccarton Road* looking southeast towards Pūtaringamotu Riccarton Bush, with graphic overlay showing possible apartment configuration and *height limit (20m) under NPS-UD Built Form Standards*. Outcome may vary through High Density Residential Standard provisions.



Figure 30: View along *Kahu Road* looking north towards Riccarton Grounds, with graphic overlay showing possible apartment configuration and *height limit (8m) under the existing CDP*.



Figure 31 View along *Kahu Road* looking southeast towards Riccarton Grounds, with graphic overlay showing possible apartment configuration and *height limit (12m) under MDRS*.



Figure 32: View along *Kahu Road* looking southeast towards Riccarton Grounds, with graphic overlay showing possible apartment configuration and *height limit (20m) under NPS-UD Built Form Standards*. Outcome may vary through High Density Residential Standard provisions.

It is recommended that the properties shown in Council's interface plan (Figure 4), along with additional sites that would experience obscured views of Pūtaringamotu, should be exempt from rules enabling intensification and remain at their current Residential, Medium Density and Special Purpose (School) Zoning as identified in the CDP. For properties adjacent to the proposed interface sites, transitional heights are recommended, with Medium Density Residential Standards applying to areas coloured light brown (Figure 33).

The recommendations captured in Beca's 2015 Character Area 7 Report¹⁴ achieve the same visual outcomes necessary to protect the heritage setting interfacing Riccarton Bush. In particular, Beca's report recommends retaining the defining character elements of this area such as 1-2 storey single family dwellings, minimum 8m setbacks and large side setbacks to retain streetscape quality. In summary, what has been stated in reference to character elements in this document, also achieves heritage outcomes.



Figure 33: Recommended modifications and additions to Christchurch City Council proposed protection and setbacks for Pūtaringamotu.

Source: Canterbury Maps 2022 with graphic overlay.

5.1.2 Properties opposite Riccarton Grounds and Riccarton House

Riccarton Grounds is an inseparable part of Riccarton Bush. Together both areas are an Outstanding Natural Feature and Significant Tree Area, related to Riccarton House, Riccarton Cottage and historic farm buildings located within the context of residential properties to which they lie adjacent. As part of the original Deans' Estate these heritage elements are considered part of a group. Currently, views of residential properties from Riccarton House are screened by native and exotic vegetation, providing a natural barrier that enables Riccarton House to retain prominence.

When travelling northwest along the path/cycleway through Riccarton Grounds from Kahu Road, much of the residential area north of Riccarton House is screened by mature trees, until reaching Riccarton House. A shift to Medium Residential Density and increased building height to 12m (3

¹⁴ Beca (2015), Christchurch Suburban Character Area Assessment prepared for Christchurch City Council, Character Area 7: Totara/Hinau/Puriri Assessment.

stories) opposite Riccarton House would change this relationship however, with the potential for housing opposite to dominate, particularly if existing vegetation were to be removed.

MDRS state that 20% landscaping is required for new development, which can be represented by tree canopy or equally by plants, grass or any combination thereof. While Council's proposed incentive to plant trees through Financial Contributions (FC) goes some way to encourage tree canopy cover at the time of development, there is a risk. Any established trees not listed in the CDP are not required to be retained so that simply sowing grass would suffice under the revised Act. There is therefore no guarantee where or if in fact planting may be implemented, so that in addition to an increased height limit, the visual amenity and protection offered by current protections in the CDP may be lost through changes brought about by MDRS.

While the adjacent residential area sits on land that appears lower than Riccarton House, if the proposed MDRS are applied to this area, housing is likely to be greater in both height and bulk, which will dominate what is currently a natural and historic setting. From Givern Street, north of these properties, a few mature trees within Riccarton Grounds can be observed above rooftops, with no views of Riccarton Bush available. The view from this vantage point is therefore not significant.

5.1.3 Properties opposite Riccarton Grounds along Kahu Road

The Former Deans' Farm Buildings are located to the northwest of Riccarton Grounds on Kahu Road on land that is now Christchurch Boys' High School, adjacent to the Ōtākaro Avon River. These buildings sit alongside the cycleway that crosses Kahu Road via a traffic light controlled crossing within the existing Residential Zone of 1-2 storey housing.

These buildings are contextually significant relative to the other listed items that make up the Dean's Estate and as streets that border Riccarton Grounds, the scale of housing on both Titoki Street and Kahu Road currently sits comfortably with the height and scale of the historic farm buildings and the setting of Riccarton Grounds.

Given the connection of these historic buildings to the setting of Pūtaringamotu, Riccarton Grounds and Riccarton House and the existing scale of residential buildings in the adjoining area, it is important the farm buildings retain a physical connection to Riccarton Grounds and that the integrity of the spatial, experiential and scenic qualities are maintained. This means that any new built forms adjacent to the former farm buildings and Riccarton Grounds should respect and maintain the integrity of the setting in terms of massing, scale, form and articulation. Unsympathetic scale and form of buildings should be avoided. Such structures have the potential to dominate and distract, thereby threatening the visual integrity of Riccarton Grounds, the farm buildings and historic setting. It is appropriate therefore that the that existing Residential Zoning remains for this section of Kahu Road, retaining the 1-2 storey height limit proposed for other streets surrounding Riccarton Bush (Figure 33).

5.2 Ecological Values

The Christchurch District Plan has identified that Pūtaringamotu contains exceptionally high ecological values, and housing intensification has the potential to affect these values. As part of Council's extensive community engagement process in April 2022, feedback on Council's draft PC14 raised several concerns including the following identified by the Riccarton Bush Trust.

While intensification is proposed outside of Riccarton Bush, development would be adjacent beyond the 10m set back, which has raised several concerns through public feedback, namely:

 $^{^{15}}$ Clause 18 of Schedule 3A of the Resource Management Act 1991.

- ground disturbance from taller buildings adjacent to Pūtaringamotu, may reduce the volume of soil trees are able to absorb nutrients and water from, leading to tree ill-health and potentially dieback.
- loss of greenspace adjacent to Pūtaringamotu through increasing site coverage, buildings, hardspace and smaller minimum site size
- reduced habitat and corridors for birds adjacent to Pūtaringamotu, particularly those that require areas larger than Pūtaringamotu.
- less soft green permeable surfaces through which rainfall can percolate, more hard surfaces from which to lose water into the stormwater system and less water available for native vegetation within Pūtaringamotu.
- impacts on vegetation and habitat quality for flora and fauna proportional to the height of structures due to shade, strong wind funnelling, increased air temperatures and increased light pollution.
- large buildings adjacent to Pūtaringamotu have the potential to alter microclimates resulting in impacts on vegetation and habitat quality for flora and fauna proportional to the height of structures due to shade, strong wind funnelling, increased air temperatures and increased light pollution.¹⁶

5.3 Summary of Key Heritage Landscape Values/Effects

The table below identifies key heritage landscape values/effects measured against relevant RMA criteria.

Table 1: Summary of key heritage landscape, ecological and visual effects relative to sections of the RMA, Chapter 6: Matters of National Importance.

ASSESSMENT FRAMEWORK	CRITERION	HERITAGE LANDSCAPE VALUES/EFFECTS
RMA Section 6 (b)	The protection of outstanding natural features from inappropriate subdivision, use and development	 Views of Pūtaringamotu from neighbouring streets will be impacted, resulting in a loss of visual connectivity for residents and passers- by between these streets and Riccarton Bush.
		 Visual connectivity between Pūtaringamotu and other planted elements in the wider landscape will also be reduced.
		o The distinctive tall podocarp trees of Pūtaringamotu as an element across the skyline will be significantly eroded by the height of new infill development and the potential bulk occupying a greater site area which will also affect the generous views currently available down driveways.

¹⁶ Riccarton Bush Trust feedback to Christchurch City Council as part of extensive community engagement on PC14.

RMA Section 6 (c)	Area of significant indigenous flora and fauna	o Ground disturbance associated with the construction of 3 storey buildings adjacent to Pūtaringamotu may cause damage to mature tree root systems;
		 Change to soil hydrology and lateral movement of water through the soil;
		 Loss of greenspace adjacent to Pūtaringamotu;
		o Reduced habitat and corridors for birds;
		 Less green permeable surfaces through which rainfall can percolate means less water available for native vegetation within Pūtaringamotu;
		o Potential for large buildings adjacent to Pūtaringamotu to alter microclimates that impact on vegetation and habitat quality. ¹⁷
RMA Section 6 (f)	Protection of historic heritage from inappropriate subdivision, use and development	o Views of the distinctive tall podocarp trees which historically have stood out within the flat Canterbury Plains will be significantly eroded by the height of new infill development (at either 12m or 20m height), which are also likely to occupy a greater site area thereby further reducing views of the bush.
		 12m buildings will have an immediate negative affect on views to Pūtaringamotu for residents and passers-by from the suburban streets surrounding Pūtaringamotu, and also from further afield.
		 Views of medium residential density housing from Riccarton Grounds north over the Ōtākaro Avon River will be greater in both height and area (bulk) and are likely to dominate what is currently a natural and historic setting.
		o Views of 20m or 12m housing along Kahu Road have potential to dominate and distract from the existing relationships between heritage elements, and their spatial, experiential and scenic qualities. Single and two-storey houses remain from initial residential subdivisions which contribute to the heritage of the area.

 17 Summary of points identified by Riccarton Bush Trust as part of feedback to Christchurch City Council's community engagement on PC14.

5.4 Recommendations for Future Research

As noted throughout this report, historic elements beyond Riccarton Bush itself contribute to the historic legibility of the setting and are considered to be component landscape features of Deans Estate. Further research into and location of the remnant plantings¹⁸ ca 1867, which extend from Kahu Street to Straven Road, is recommended and for Deans paddock (Boys High School Grounds) and Kahu Road brick bridge. Consider scheduling these items as part of the group.

6 Conclusion

Pūtaringamotu is a sensitive heritage site and setting, with high landscape, heritage and ecological values.

The focus of Council's qualifying matters (proposed interface) has been those sites surrounding Riccarton Bush. The visual impact of these sites on Riccarton Bush is greatest when seen from the surrounding suburban streets but also from particular viewpoints further afield.

Given Riccarton Bush holds a relationship with the wider setting, including Riccarton House, Riccarton Grounds and the Former Farm Buildings, the recommendations in this report respond to the values of each of these elements as a group.

Viewpoints to Riccarton Bush were selected due to their significance as part of the heritage setting and their proximity to Riccarton Bush. These are sensitive locations, where intensification would be most visible and where potential landscape and visual effects are likely to be greatest.

The visual impact of implementing Medium Density Residential Standards within the area identified by Council, is heightened by the close proximity of the bush to the viewer and the sensitivity of the setting.

Despite a proposed reduction in the height of buildings from 20m height to 12m, adverse visual effects arise from the increase in current height limits of buildings not only adjacent to Pūtaringamotu, but also Riccarton Grounds, Riccarton House and the former Deans' farm buildings, weakening their connection with the setting.

Intensification to a height of 12m would obscure views of the kahikatea forest canopy, a distinctive and defining element across the skyline.

This heritage review finds that adverse effects on Pūtaringamotu and Setting are not mitigated by Council's proposed planning approach (PC14). The proposed height limits have the potential to reduce the experience of residents, passers-by and some views further afield by obscuring existing sightlines of the bush.

Contextual, landmark and historic values identified in the District Plan are adversely affected. The relationships between Riccarton Bush and surrounding streets are obscured and the important relationship between the forest canopy and its setting is weakened by the increased height. Greater intensification of this area will therefore detract from and obscure the values for which Pūtaringamotu is considered outstanding, that is its landmark value of tall podocarp trees which have historically stood out across the flat Canterbury Plains; and its contextual values which include its association with a number of heritage features that date to the Deans occupation of the site.

¹⁸ Identified in Beaumont, 2009, Conservation Report Riccarton House: Landscape, prepared for Christchurch City

It is recommended that the existing Residential Zone (up to 2 storeys), Medium Residential and Special Purpose (School) Zones are retained in this area and additional sites are added to Council's proposed interface as per Figure 33.

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Appendix A

ICOMOS NZ Charter for the Conservation of Places of Cultural Heritage Value 2010

ICOMOS New Zealand Charter

for the Conservation of Places of Cultural Heritage Value

Revised 2010

Preamble

New Zealand retains a unique assemblage of **places** of **cultural heritage value** relating to its indigenous and more recent peoples. These areas, **cultural landscapes** and features, buildings and **structures**, gardens, archaeological sites, traditional sites, monuments, and sacred **places** are treasures of distinctive value that have accrued meanings over time. New Zealand shares a general responsibility with the rest of humanity to safeguard its cultural heritage **places** for present and future generations. More specifically, the people of New Zealand have particular ways of perceiving, relating to, and conserving their cultural heritage **places**.

Following the spirit of the International Charter for the Conservation and Restoration of Monuments and Sites (the Venice Charter - 1964), this charter sets out principles to guide the **conservation** of **places** of **cultural heritage value** in New Zealand. It is a statement of professional principles for members of ICOMOS New Zealand.

This charter is also intended to guide all those involved in the various aspects of **conservation** work, including owners, guardians, managers, developers, planners, architects, engineers, craftspeople and those in the construction trades, heritage practitioners and advisors, and local and central government authorities. It offers guidance for communities, organisations, and individuals involved with the **conservation** and management of cultural heritage **places**.

This charter should be made an integral part of statutory or regulatory heritage management policies or plans, and should provide support for decision makers in statutory or regulatory processes.

Each article of this charter must be read in the light of all the others. Words in bold in the text are defined in the definitions section of this charter.

This revised charter was adopted by the New Zealand National Committee of the International Council on Monuments and Sites at its meeting on 4 September 2010.

Purpose of conservation

1. The purpose of conservation

The purpose of conservation is to care for places of cultural heritage value.

In general, such places:

- (i) have lasting values and can be appreciated in their own right;
- (ii) inform us about the past and the cultures of those who came before us;
- (iii) provide tangible evidence of the continuity between past, present, and future;
- (iv) underpin and reinforce community identity and relationships to ancestors and the land;
 and
- (v) provide a measure against which the achievements of the present can be compared.

It is the purpose of **conservation** to retain and reveal such values, and to support the ongoing meanings and functions of **places** of **cultural heritage value**, in the interests of present and future generations.

Conservation principles

2. Understanding cultural heritage value

Conservation of a place should be based on an understanding and appreciation of all aspects of its cultural heritage value, both tangible and intangible. All available forms of knowledge and evidence provide the means of understanding a place and its cultural heritage value and cultural heritage significance. Cultural heritage value should be understood through consultation with connected people, systematic documentary and oral research, physical investigation and recording of the place, and other relevant methods.

All relevant **cultural heritage values** should be recognised, respected, and, where appropriate, revealed, including values which differ, conflict, or compete.

The policy for managing all aspects of a **place**, including its **conservation** and its **use**, and the implementation of the policy, must be based on an understanding of its **cultural heritage value**.

3. Indigenous cultural heritage

The indigenous cultural heritage of **tangata whenua** relates to **whanau**, **hapu**, and **iwi** groups. It shapes identity and enhances well-being, and it has particular cultural meanings and values for the present, and associations with those who have gone before. Indigenous cultural heritage brings with it responsibilities of guardianship and the practical application and passing on of associated knowledge, traditional skills, and practices.

The Treaty of Waitangi is the founding document of our nation. Article 2 of the Treaty recognises and guarantees the protection of **tino rangatiratanga**, and so empowers **kaitiakitanga** as customary trusteeship to be exercised by **tangata whenua**. This customary trusteeship is exercised over their **taonga**, such as sacred and traditional **places**, built heritage, traditional practices, and other cultural heritage resources. This obligation extends beyond current legal ownership wherever such cultural heritage exists.

Particular **matauranga**, or knowledge of cultural heritage meaning, value, and practice, is associated with **places**. **Matauranga** is sustained and transmitted through oral, written, and physical forms determined by **tangata whenua**. The **conservation** of such **places** is therefore conditional on decisions made in associated **tangata whenua** communities, and should proceed only in this context. In particular, protocols of access, authority, ritual, and practice are determined at a local level and should be respected.

4. Planning for conservation

Conservation should be subject to prior documented assessment and planning.

All **conservation** work should be based on a **conservation plan** which identifies the **cultural heritage value** and **cultural heritage significance** of the **place**, the **conservation** policies, and the extent of the recommended works

The **conservation plan** should give the highest priority to the **authenticity** and **integrity** of the **place**.

Other guiding documents such as, but not limited to, management plans, cyclical **maintenance** plans, specifications for **conservation** work, interpretation plans, risk mitigation plans, or emergency plans should be guided by a **conservation plan**.

5. Respect for surviving evidence and knowledge

Conservation maintains and reveals the authenticity and integrity of a place, and involves the least possible loss of fabric or evidence of cultural heritage value. Respect for all forms of knowledge and existing evidence, of both tangible and intangible values, is essential to the authenticity and integrity of the place.

Conservation recognises the evidence of time and the contributions of all periods. The **conservation** of a **place** should identify and respect all aspects of its **cultural heritage value** without unwarranted emphasis on any one value at the expense of others.

The removal or obscuring of any physical evidence of any period or activity should be minimised, and should be explicitly justified where it does occur. The **fabric** of a particular period or activity may be obscured or removed if assessment shows that its removal would not diminish the **cultural heritage value** of the **place**.

In **conservation**, evidence of the functions and intangible meanings of **places** of **cultural heritage value** should be respected.

6. Minimum intervention

Work undertaken at a **place** of **cultural heritage value** should involve the least degree of **intervention** consistent with **conservation** and the principles of this charter.

Intervention should be the minimum necessary to ensure the retention of **tangible** and **intangible values** and the continuation of **uses** integral to those values. The removal of **fabric** or the alteration of features and spaces that have **cultural heritage value** should be avoided.

7. Physical investigation

Physical investigation of a **place** provides primary evidence that cannot be gained from any other source. Physical investigation should be carried out according to currently accepted professional standards, and should be documented through systematic **recording**.

Invasive investigation of **fabric** of any period should be carried out only where knowledge may be significantly extended, or where it is necessary to establish the existence of **fabric** of **cultural heritage value**, or where it is necessary for **conservation** work, or where such **fabric** is about to be damaged or destroyed or made inaccessible. The extent of invasive investigation should minimise the disturbance of significant **fabric**.

8. Use

The **conservation** of a **place** of **cultural heritage value** is usually facilitated by the **place** serving a useful purpose.

Where the **use** of a **place** is integral to its **cultural heritage value**, that **use** should be retained.

Where a change of **use** is proposed, the new **use** should be compatible with the **cultural heritage value** of the **place**, and should have little or no adverse effect on the **cultural heritage value**.

9. Setting

Where the **setting** of a **place** is integral to its **cultural heritage value**, that **setting** should be conserved with the **place** itself. If the **setting** no longer contributes to the **cultural heritage value** of the **place**, and if **reconstruction** of the **setting** can be justified, any **reconstruction** of the **setting** should be based on an understanding of all aspects of the **cultural heritage value** of the **place**.

10. Relocation

The on-going association of a **structure** or feature of **cultural heritage value** with its location, site, curtilage, and **setting** is essential to its **authenticity** and **integrity**. Therefore, a **structure** or feature of **cultural heritage value** should remain on its original site.

Relocation of a **structure** or feature of **cultural heritage value**, where its removal is required in order to clear its site for a different purpose or construction, or where its removal is required to enable its **use** on a different site, is not a desirable outcome and is not a **conservation** process.

In exceptional circumstances, a **structure** of **cultural heritage value** may be relocated if its current site is in imminent danger, and if all other means of retaining the **structure** in its current location have been exhausted. In this event, the new location should provide a **setting** compatible with the **cultural heritage value** of the **structure**.

11. Documentation and archiving

The **cultural heritage value** and **cultural heritage significance** of a **place**, and all aspects of its **conservation**, should be fully documented to ensure that this information is available to present and future generations.

Documentation includes information about all changes to the **place** and any decisions made during the **conservation** process.

Documentation should be carried out to archival standards to maximise the longevity of the record, and should be placed in an appropriate archival repository.

Documentation should be made available to **connected people** and other interested parties. Where reasons for confidentiality exist, such as security, privacy, or cultural appropriateness, some information may not always be publicly accessible.

12. Recording

Evidence provided by the **fabric** of a **place** should be identified and understood through systematic research, **recording**, and analysis.

Recording is an essential part of the physical investigation of a **place**. It informs and guides the **conservation** process and its planning. Systematic **recording** should occur prior to, during, and following any **intervention**. It should include the **recording** of new evidence revealed, and any **fabric** obscured or removed.

Recording of the changes to a **place** should continue throughout its life.

13. Fixtures, fittings, and contents

Fixtures, fittings, and **contents** that are integral to the **cultural heritage value** of a **place** should be retained and conserved with the **place**. Such fixtures, fittings, and **contents** may include carving, painting, weaving, stained glass, wallpaper, surface decoration, works of art, equipment and machinery, furniture, and personal belongings.

Conservation of any such material should involve specialist **conservation** expertise appropriate to the material. Where it is necessary to remove any such material, it should be recorded, retained, and protected, until such time as it can be reinstated.

Conservation processes and practice

14. Conservation plans

A conservation plan, based on the principles of this charter, should:

- be based on a comprehensive understanding of the cultural heritage value of the
 place and assessment of its cultural heritage significance;
- (ii) include an assessment of the **fabric** of the **place**, and its condition;
- (iii) give the highest priority to the **authenticity** and **integrity** of the **place**;
- (iv) include the entirety of the **place**, including the **setting**;
- (v) be prepared by objective professionals in appropriate disciplines;
- (vi) consider the needs, abilities, and resources of **connected people**;
- (vii) not be influenced by prior expectations of change or development;
- (viii) specify **conservation** policies to guide decision making and to guide any work to be undertaken:
- (ix) make recommendations for the **conservation** of the **place**; and
- (x) be regularly revised and kept up to date.

15. Conservation projects

Conservation projects should include the following:

- (i) consultation with interested parties and **connected people**, continuing throughout the project;
- (ii) opportunities for interested parties and connected people to contribute to and participate in the project;
- (iii) research into documentary and oral history, using all relevant sources and repositories of knowledge;
- (iv) physical investigation of the **place** as appropriate;
- (v) use of all appropriate methods of **recording**, such as written, drawn, and photographic;
- (vi) the preparation of a **conservation plan** which meets the principles of this charter;
- (vii) guidance on appropriate **use** of the **place**;
- (viii) the implementation of any planned **conservation** work; (ix) the **documentation** of the **conservation** work as it proceeds; and
- (x) where appropriate, the deposit of all records in an archival repository.

A **conservation** project must not be commenced until any required statutory authorisation has been granted.

16. Professional, trade, and craft skills

All aspects of **conservation** work should be planned, directed, supervised, and undertaken by people with appropriate **conservation** training and experience directly relevant to the project.

All **conservation** disciplines, arts, crafts, trades, and traditional skills and practices that are relevant to the project should be applied and promoted.

17. Degrees of intervention for conservation purposes

Following research, **recording**, assessment, and planning, **intervention** for **conservation** purposes may include, in increasing degrees of **intervention**:

- (i) preservation, through stabilisation, maintenance, or repair;
- (ii) restoration, through reassembly, reinstatement, or removal;
- (iii) reconstruction; and (iv) adaptation.

In many **conservation** projects a range of processes may be utilised. Where appropriate, **conservation** processes may be applied to individual parts or components of a **place** of **cultural heritage value**.

The extent of any **intervention** for **conservation** purposes should be guided by the **cultural heritage value** of a **place** and the policies for its management as identified in a **conservation plan**. Any **intervention** which would reduce or compromise **cultural heritage value** is undesirable and should not occur.

Preference should be given to the least degree of **intervention**, consistent with this charter.

Re-creation, meaning the conjectural **reconstruction** of a **structure** or **place**; replication, meaning to make a copy of an existing or former **structure** or **place**; or the construction of generalised representations of typical features or **structures**, are not **conservation** processes and are outside the scope of this charter.

18. Preservation

Preservation of a **place** involves as little **intervention** as possible, to ensure its long-term survival and the continuation of its **cultural heritage value**.

Preservation processes should not obscure or remove the patina of age, particularly where it contributes to the **authenticity** and **integrity** of the **place**, or where it contributes to the structural stability of materials.

i. Stabilisation

Processes of decay should be slowed by providing treatment or support.

ii. Maintenance

A **place** of **cultural heritage value** should be maintained regularly. **Maintenance** should be carried out according to a plan or work programme.

iii. Repair

Repair of a **place** of **cultural heritage value** should utilise matching or similar materials. Where it is necessary to employ new materials, they should be distinguishable by experts, and should be documented.

Traditional methods and materials should be given preference in **conservation** work.

Repair of a technically higher standard than that achieved with the existing materials or construction practices may be justified only where the stability or life expectancy of the site or material is increased, where the new material is compatible with the old, and where the **cultural heritage value** is not diminished.

19. Restoration

The process of **restoration** typically involves **reassembly** and **reinstatement**, and may involve the removal of accretions that detract from the **cultural heritage value** of a **place**.

Restoration is based on respect for existing **fabric**, and on the identification and analysis of all available evidence, so that the **cultural heritage value** of a **place** is recovered or revealed. **Restoration** should be carried out only if the **cultural heritage value** of the **place** is recovered or revealed by the process.

Restoration does not involve conjecture.

i. Reassembly and reinstatement

Reassembly uses existing material and, through the process of **reinstatement**, returns it to its former position. **Reassembly** is more likely to involve work on part of a **place** rather than the whole **place**.

ii. Removal

Occasionally, existing **fabric** may need to be permanently removed from a **place**. This may be for reasons of advanced decay, or loss of structural **integrity**, or because particular **fabric** has been identified in a **conservation plan** as detracting from the **cultural heritage value** of the **place**.

The **fabric** removed should be systematically **recorded** before and during its removal. In some cases it may be appropriate to store, on a long-term basis, material of evidential value that has been removed.

20. Reconstruction

Reconstruction is distinguished from **restoration** by the introduction of new material to replace material that has been lost.

Reconstruction is appropriate if it is essential to the function, **integrity**, **intangible value**, or understanding of a **place**, if sufficient physical and documentary evidence exists to minimise conjecture, and if surviving **cultural heritage value** is preserved.

Reconstructed elements should not usually constitute the majority of a place or structure.

21. Adaptation

The **conservation** of a **place** of **cultural heritage value** is usually facilitated by the **place** serving a useful purpose. Proposals for **adaptation** of a **place** may arise from maintaining its continuing **use**, or from a proposed change of **use**.

Alterations and additions may be acceptable where they are necessary for a **compatible use** of the **place**. Any change should be the minimum necessary, should be substantially reversible, and should have little or no adverse effect on the **cultural heritage value** of the **place**.

Any alterations or additions should be compatible with the original form and **fabric** of the **place**, and should avoid inappropriate or incompatible contrasts of form, scale, mass, colour, and material. **Adaptation** should not dominate or substantially obscure the original form and **fabric**, and should not adversely affect the **setting** of a **place** of **cultural heritage value**. New work should complement the original form and **fabric**.

22. Non-intervention

In some circumstances, assessment of the **cultural heritage value** of a **place** may show that it is not desirable to undertake any **conservation intervention** at that time. This approach may be appropriate where undisturbed constancy of **intangible values**, such as the spiritual associations of a sacred **place**, may be more important than its physical attributes.

23. Interpretation

Interpretation actively enhances public understanding of all aspects of **places** of **cultural heritage value** and their **conservation**. Relevant cultural protocols are integral to that understanding, and should be identified and observed.

Where appropriate, interpretation should assist the understanding of **tangible** and **intangible values** of a **place** which may not be readily perceived, such as the sequence of construction and change, and the meanings and associations of the **place** for **connected people**.

Any interpretation should respect the **cultural heritage value** of a **place**. Interpretation methods should be appropriate to the **place**. Physical **interventions** for interpretation purposes should not detract from the experience of the **place**, and should not have an adverse effect on its **tangible** or **intangible values**.

24. Risk mitigation

Places of **cultural heritage value** may be vulnerable to natural disasters such as flood, storm, or earthquake; or to humanly induced threats and risks such as those arising from earthworks, subdivision and development, buildings works, or wilful damage or neglect. In order to safeguard **cultural heritage value**, planning for risk mitigation and emergency management is necessary.

Potential risks to any **place** of **cultural heritage value** should be assessed. Where appropriate, a risk mitigation plan, an emergency plan, and/or a protection plan should be prepared, and implemented as far as possible, with reference to a conservation plan.

Definitions

For the purposes of this charter:

- Adaptation means the process(es) of modifying a place for a compatible use while retaining its cultural heritage value. Adaptation processes include alteration and addition.
- Authenticity means the credibility or truthfulness of the surviving evidence and knowledge of the cultural heritage value of a place. Relevant evidence includes form and design, substance and fabric, technology and craftsmanship, location and surroundings, context and setting, use and function, traditions, spiritual essence, and sense of place, and includes tangible and intangible values.

 Assessment of authenticity is based on identification and analysis of relevant evidence and knowledge, and respect for its cultural context.
- Compatible use means a use which is consistent with the cultural heritage value of a place, and which has little or no adverse impact on its authenticity and integrity.
- **Connected people** means any groups, organisations, or individuals having a sense of association with or responsibility for a **place** of **cultural heritage value**.
- Conservation means all the processes of understanding and caring for a place so as to safeguard its cultural heritage value. Conservation is based on respect for the existing fabric, associations, meanings, and use of the place. It requires a cautious approach of doing as much work as necessary but as little as possible, and retaining authenticity and integrity, to ensure that the place and its values are passed on to future generations.
- Conservation plan means an objective report which documents the history, fabric, and cultural heritage value of a place, assesses its cultural heritage significance, describes the condition of the place, outlines conservation policies for managing the place, and makes recommendations for the conservation of the place.
- Contents means moveable objects, collections, chattels, documents, works of art, and ephemera that are not fixed or fitted to a place, and which have been assessed as being integral to its cultural heritage value.
- **Cultural heritage significance** means the **cultural heritage value** of a **place** relative to other similar or comparable **places**, recognising the particular cultural context of the **place**.
- **Cultural heritage value/s** means possessing aesthetic, archaeological, architectural, commemorative, functional, historical, landscape, monumental, scientific, social, spiritual, symbolic, technological, traditional, or other **tangible** or **intangible values**, associated with human activity.
- Cultural landscapes means an area possessing cultural heritage value arising from the relationships between people and the environment. Cultural landscapes may have been designed, such as gardens, or may have evolved from human settlement and land use over time, resulting in a diversity of distinctive landscapes in different areas. Associative cultural landscapes, such as sacred mountains, may lack tangible cultural elements but may have strong intangible cultural or spiritual associations.
- **Documentation** means collecting, **recording**, keeping, and managing information about a **place** and its **cultural heritage value**, including information about its history, **fabric**, and meaning; information about decisions taken; and information about physical changes and **interventions** made to the **place**.
- **Fabric** means all the physical material of a **place**, including subsurface material, **structures**, and interior and exterior surfaces including the patina of age; and including fixtures and fittings, and gardens and plantings.

Hapu means a section of a large tribe of the tangata whenua.

- **Intangible value** means the abstract **cultural heritage value** of the meanings or associations of a **place**, including commemorative, historical, social, spiritual, symbolic, or traditional values.
- Integrity means the wholeness or intactness of a place, including its meaning and sense of place, and all the tangible and intangible attributes and elements necessary to express its cultural heritage value.
- **Intervention** means any activity that causes disturbance of or alteration to a **place** or its **fabric**. **Intervention** includes archaeological excavation, invasive investigation of built **structures**, and any **intervention** for **conservation** purposes.

Iwi means a tribe of the tangata whenua.

- **Kaitiakitanga** means the duty of customary trusteeship, stewardship, guardianship, and protection of land, resources, or **taonga**.
- **Maintenance** means regular and on-going protective care of a **place** to prevent deterioration and to retain its **cultural heritage value**.
- Matauranga means traditional or cultural knowledge of the tangata whenua.
- **Non-intervention** means to choose not to undertake any activity that causes disturbance of or alteration to a **place** or its **fabric**.
- Place means any land having cultural heritage value in New Zealand, including areas; cultural landscapes; buildings, structures, and monuments; groups of buildings, structures, or monuments; gardens and plantings; archaeological sites and features; traditional sites; sacred places; townscapes and streetscapes; and settlements. Place may also include land covered by water, and any body of water. Place includes the setting of any such place.

Preservation means to maintain a **place** with as little change as possible.

Reassembly means to put existing but disarticulated parts of a **structure** back together.

- **Reconstruction** means to build again as closely as possible to a documented earlier form, using new materials.
- **Recording** means the process of capturing information and creating an archival record of the **fabric** and **setting** of a **place**, including its configuration, condition, **use**, and change over time.
- **Reinstatement** means to put material components of a **place**, including the products of **reassembly**, back in position.
- **Repair** means to make good decayed or damaged **fabric** using identical, closely similar, or otherwise appropriate material.
- **Restoration** means to return a **place** to a known earlier form, by **reassembly** and **reinstatement**, and/or by removal of elements that detract from its **cultural heritage value**.
- Setting means the area around and/or adjacent to a place of cultural heritage value that is integral to its function, meaning, and relationships. Setting includes the structures, outbuildings, features, gardens, curtilage, airspace, and accessways forming the spatial context of the place or used in association with the place. Setting also includes cultural landscapes, townscapes, and streetscapes; perspectives, views, and viewshafts to and from a place; and relationships with other places which contribute to the cultural heritage value of the place. Setting may extend beyond the area defined by legal title, and may include a buffer zone necessary for the longterm protection of the cultural heritage value of the place.

Stabilisation means the arrest or slowing of the processes of decay.

Structure means any building, standing remains, equipment, device, or other facility made by people and which is fixed to the land.

Tangata whenua means generally the original indigenous inhabitants of the land; and means specifically the people exercising **kaitiakitanga** over particular land, resources, or **taonga**.

Tangible value means the physically observable **cultural heritage value** of a **place**, including archaeological, architectural, landscape, monumental, scientific, or technological values.

Taonga means anything highly prized for its cultural, economic, historical, spiritual, or traditional value, including land and natural and cultural resources.

Tino rangatiratanga means the exercise of full chieftainship, authority, and responsibility.

Use means the functions of a **place**, and the activities and practices that may occur at the **place**. The functions, activities, and practices may in themselves be of **cultural heritage value**.

Whanau means an extended family which is part of a hapu or iwi.

ISBN 978-0-473-17116-2 (PDF)

English language text first published 1993 Bilingual text first published 1995

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This revised text replaces the 1993 and 1995 versions and should be referenced as the ICOMOS New Zealand Charter for the Conservation of Places of Cultural Heritage Value (ICOMOS New Zealand Charter 2010).

This revision incorporates changes in conservation philosophy and best practice since 1993 and is the only version of the ICOMOS New Zealand Charter approved by ICOMOS New Zealand (Inc.) for use.

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Appendix B

Historic Gardens (The Florence Charter 1981)

HISTORIC GARDENS (THE FLORENCE CHARTER 1981)

Adopted by ICOMOS in December 1982.

PREAMBLE

The ICOMOS-IFLA International Committee for Historic Gardens, meeting in Florence on 21 May 1981, decided to draw up a charter on the preservation of historic gardens which would bear the name of that town. The present Florence Charter was drafted by the Committee and registered by ICOMOS on 15 December 1982 as an addendum to the Venice Charter covering the specific field concerned.

DEFINITIONS AND OBJECTIVES

Article 1.

"A historic garden is an architectural and horticultural composition of interest to the public from the historical or artistic point of view". As such, it is to be considered as a monument.

Article 2.

"The historic garden is an architectural composition whose constituents are primarily vegetal and therefore living, which means that they are perishable and renewable." Thus its appearance reflects the perpetual balance between the cycle of the seasons, the growth and decay of nature and the desire of the artist and craftsman to keep it permanently unchanged.

Article 3.

As a monument, the historic garden must be preserved in accordance with the spirit of the Venice Charter. However, since it is a living monument, its preservation must be governed by specific rules which are the subject of the Present charter.

Article 4.

The architectural composition of the historic garden includes:

- Its plan and its topography.
- Its vegetation, including its species, proportions, colour schemes, spacing and respective heights.
- Its structural and decorative features.
- Its water, running or still, reflecting the sky.

Article 5.

As the expression of the direct affinity between civilisation and nature, and as a place of enjoyment suited to meditation or repose, the garden thus acquires the cosmic significance of an idealised image of the world, a "paradise" in the etymological sense of the term, and yet a testimony to a culture, a style, an age, and often to the originality of a creative artist.

Article 6.

The term "historic garden" is equally applicable to small gardens and to large parks, whether formal or "landscape".

Article 7.

Whether or not it is associated with a building in which case it is an inseparable complement, the historic garden cannot be isolated from its own particular environment, whether urban or rural, artificial or natural.

Article 8.

A historic site is a specific landscape associated with a memorable act, as, for example, a major historic event; a well-known myth; an epic combat; or the subject of a famous picture.

Article 9.

The preservation of historic gardens depends on their identification and listing. They require several kinds of action, namely maintenance, conservation and restoration. In certain cases, reconstruction may be recommended. The authenticity of a historic garden depends as much on the design and scale of its various parts as on its decorative features and on the choice of plant or inorganic materials adopted for each of its parts.

MAINTENANCE, CONSERVATION, RESTORATION, RECONSTRUCTION

Article 10.

In any work of maintenance, conservation, restoration or reconstruction of a historic garden, or of any part of it, all its constituent features must be dealt with simultaneously. To isolate the various operations would damage the unity of the whole.

MAINTENANCE AND CONSERVATION

Article 11.

Continuous maintenance of historic gardens is of paramount importance. Since the principal material is vegetal, the preservation of the garden in an unchanged condition requires both prompt replacements when required and a long-term programme of periodic renewal (clear felling and replanting with mature specimens).

Article 12.

Those species of trees, shrubs, plants and flowers to be replaced periodically must be selected with regard for established and recognised practice in each botanical and horticultural region, and with the aim to determine the species initially grown and to preserve them.

Article 13.

The permanent or movable architectural, sculptural or decorative features which form an integral part of the historic garden must be removed or displaced only insofar as this is essential for their conservation or restoration. The replacement or restoration of any such jeopardised features must be effected in accordance with the principles of the Venice Charter, and the date of any complete replacement must be indicated.

Article 14.

The historic garden must be preserved in appropriate surroundings. Any alteration to the physical environment which will endanger the ecological equilibrium must be prohibited. These applications are applicable to all aspects of the infrastructure, whether internal or external (drainage works, irrigation systems, roads, car parks, fences, caretaking facilities, visitors' amenities, etc.).

RESTORATION AND RECONSTRUCTION

Article 15.

No restoration work and, above all, no reconstruction work on a historic garden shall be undertaken without thorough prior research to ensure that such work is scientifically executed and which will involve everything from excavation to the assembling of records relating to the garden in question and to similar gardens. Before any practical work starts, a project must be prepared on the basis of said research and must be submitted to a group of experts for joint examination and approval.

Article 16.

Restoration work must respect the successive stages of evolution of the garden concerned. In principle, no one period should be given precedence over any other, except in exceptional cases where the degree of damage or destruction affecting certain parts of a garden may be such that it is decided to reconstruct it on the basis of the traces that survive or of unimpeachable documentary evidence. Such reconstruction work might be undertaken more particularly on the parts of the garden nearest to the building it contains in order to bring out their significance in the design.

Article 17.

Where a garden has completely disappeared or there exists no more than conjectural evidence of its successive stages a reconstruction could not be considered a historic garden.

USE

Article 18.

While any historic garden is designed to be seen and walked about in, access to it must be restricted to the extent demanded by its size and vulnerability, so that its physical fabric and cultural message may be preserved.

Article 19.

By reason of its nature and purpose, a historic garden is a peaceful place conducive to human contacts, silence and awareness of nature. This conception of its everyday use must contrast with its role on those rare occasions when it accommodates a festivity. Thus, the conditions of such occasional use of a historic garden should be clearly defined, in order that any such festivity may itself serve to enhance the visual effect of the garden instead of

perverting or damaging it.

Article 20.

While historic gardens may be suitable for quiet games as a daily occurrence, separate areas appropriate for active and lively games and sports should also be laid out adjacent to the historic garden, so that the needs of the public may be satisfied in this respect without prejudice to the conservation of the gardens and landscapes.

Article 21.

The work of maintenance and conservation, the timing of which is determined by season and brief operations which serve to restore the garden's authenticity, must always take precedence over the requirements of public use. All arrangements for visits to historic gardens must be subjected to regulations that ensure the spirit of the place is preserved.

Article 22.

If a garden is walled, its walls may not be removed without prior examination of all the possible consequences liable to lead to changes in its atmosphere and to affect its preservation.

LEGAL AND ADMINISTRATIVE PROTECTION

Article 23.

It is the task of the responsible authorities to adopt, on the advice of qualified experts, the appropriate legal and administrative measures for the identification, listing and protection of historic gardens. The preservation of such gardens must be provided for within the framework of land-use plans and such provision must be duly mentioned in documents relating to regional and local planning. It is also the task of the responsible authorities to adopt, with the advice of qualified experts, the financial measures which will facilitate the maintenance, conservation and restoration, and, where necessary, the reconstruction of historic gardens.

Article 24.

The historic garden is one of the features of the patrimony whose survival, by reason of its nature, requires intensive, continuous care by trained experts. Suitable provision should therefore be made for the training of such persons, whether historians, architects, landscape architects, gardeners or botanists. Care should also be taken to ensure that there is regular propagation of the plant varieties necessary for maintenance or restoration.

Article 25.

Interest in historic gardens should be stimulated by every kind of activity capable of emphasising their true value as part of the patrimony and making for improved knowledge and appreciation of them: promotion of scientific research; international exchange and circulation of information; publications, including works designed for the general public; the encouragement of public access under suitable control and use of the media to develop awareness of the need for due respect for nature and the historic heritage. The most outstanding of the historic gardens shall be proposed for inclusion in the World Heritage List.

Nota Bene

The above recommendations are applicable to all the historic gardens in the world.

Additional clauses applicable to specific types of gardens may be subsequently appended to the present Charter with brief descriptions of the said types.

Appendix C

Representative viewpoints of Pūtaringamotu's 'visual catchment' shown in Figure 10 - viewpoints 34 to 54.

PURIRI STREET



Figure 34: View of Riccarton Bush through driveways of 16 and 18 Puriri Street.

TOTARA STREET



Figure 35: View southeast towards Pūtaringamotu. The Bush is clearly seen along the skyline from the corner of Totara and Puriri Streets.

TOTARA STREET



Figure 36: View of Riccarton Bush opposite 95 and 97 Totara Street, where a 12m and 20m height limit is likely to obscure views of Riccarton Bush.

TOTARA STREET



Figure 37: View of Riccarton Bush along the skyline from Totara Street.

NGAHERE STREET



Figure 38: View southeast towards Riccarton Bush across the rooftops of 1 – 9 Ngahere St. Photograph taken from the corner of Totara and Ngahere Streets.

NGAHERE STREET



Figure 39: View towards 15 and 17 Ngahere Street, which are currently within interface area, but MDRS of 12m height would likely obscure views to the bush.

CORNER MIRO & HINAU STREETS

Figure 40: View towards Pūtaringamotu from the corner of Miro and Hinau Streets looking southeast.

Figure 41: View along the skyline from residential properties in Hinau Street.

HINAU STREET



CORNER HINAU & PURIRI STREETS



Figure 42: View towards Pūtaringamotu from the corner of Puriri and Hinau Streets looking southeast.

RICCARTON GROUNDS



Figure 43: View looking northeast towards Riccarton House (right) and 1-2 storey dwellings across the Ōtākaro Avon River.

RICCARTON GROUNDS



Figure 44: View looking northwest alongside Riccarton House (left) towards 1-2 storey dwellings currently screened by native vegetation.

RICCARTON GROUNDS



Figure 45: View looking northwest along Riccarton Grounds pathway/cycleway. Ōtākaro Avon River to the right.

KAHU ROAD



Figure 46: View towards housing along Kahu Road from Riccarton Grounds. Potential for 20m (six stories) with proposed intensification for this area.

FORMER FARM BUILDINGS - KAHU ROAD



Figure 47: Former farm buildings on Kahu Road (indicated) could be easily overwhelmed by three or six storey housing along Kahu Road. View looking northeast.

KAHU ROAD



Figure 48: Riccarton Grounds (left), Kahu Road and proposed residential area for intensification (right) to 20m.

RIMU STREET



Figure 49: Riccarton Bush visible from Riccarton commercial area (Rimu Street).

RICCARTON MALL – COMMERCIAL AREA



Figure 50: Riccarton Bush from the rooftop of Riccarton Mall.

MATIPO STREET



Figure 51: Riccarton Bush is clearly visible as a familiar landmark some distance away, as viewed from the length of Matipo Street (looking north) as far away as Blenheim Road.

RICCARTON BUSH



Figure 52: View of Riccarton Bush from within, looking south on Te Ara Kahikatea Track. Views to the outside are obscured, but some areas are less dense than others.



Figure 53: View from within Riccarton Bush looking west from Te Ara Kahikatea Track.



Figure 54: View from within Riccarton Bush looking south towards maintenance/emergency exit.





Kauri Cluster Street Renewals

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

A Christchurch City Council Consultation Newsletter—April 2007

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

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

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

CONTENTS	
Objectives	2
Previous Consultation	2
Kauri Street	3
Rata Street	4
Rimu Street	5
Consultation Process	6
Feedback Form Insert	,

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



Kauri Cluster - Kauri Street, Rata Street and Rimu Street

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

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



Objectives

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

The primary objectives for the project are:

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

The secondary objectives for the project are:

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

Previous Consultation

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

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

The key issues raised related to:

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

Street Trees and Landscaping Features



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

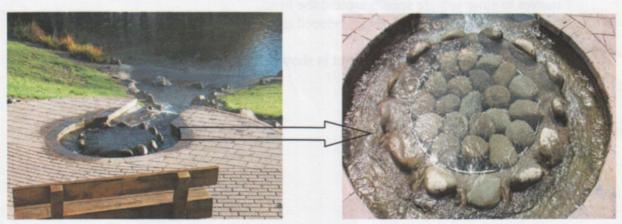




The rimu tree (Dacrydium cupressinum) is also known as the New Zealand red pine. It is a native of New Zealand and is a slow-growing evergreen tree, which bears tiny leaves on pendulous, bronzy green branchlets. This species resents transplanting, is drought tender, and produces only tiny nutlets.

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

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



Kauri Street

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

The Concept Plan

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

- Full kerb and channel renewal. The existing kerb and dish channel will be replaced with kerb and flat channel for its entire length.
- The carriageway will be narrowed from the existing 13 metres to 10 metres with parking permitted along both sides.
- The existing parking restrictions will be maintained along the new carriageway.
- Parking bays will be marked on both kerbs with a through carriageway width of 6 metres.
- There will be no change to the location or design of the existing threshold treatments both at the intersection with Riccarton Road and north of the intersection of Riccarton Road.

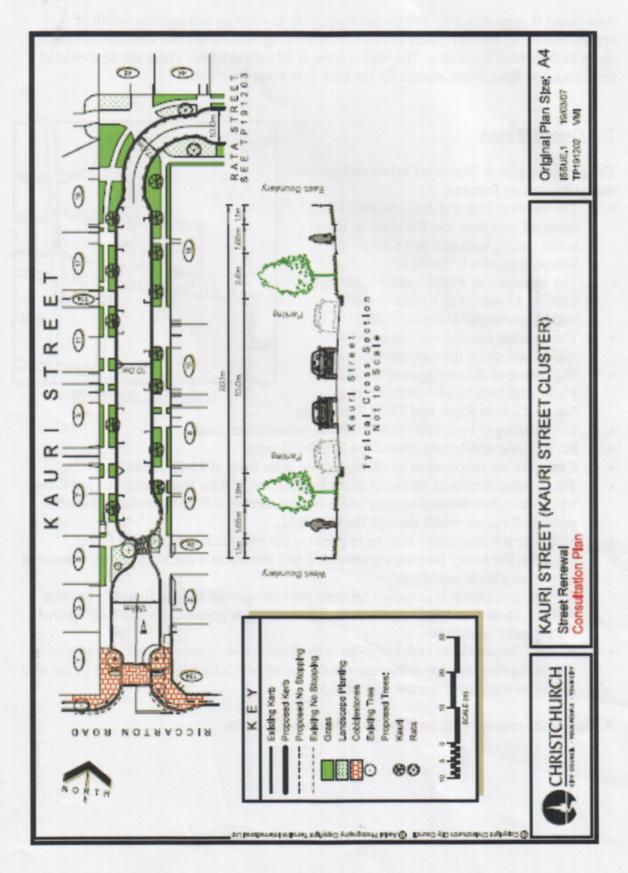


LOCALITY DIAGRAM

- Wider grass berms (between 1.9 metres and 2.6 metres wide) will be located between the parking areas and the footpaths.
- Footpaths will be 1.65 metres wide with a 1.1-metre grass service strip adjacent to the property boundaries.
- Kauri trees are proposed to be planted in the grass berm at 15-20-metre intervals, with low level landscaping at the intersection of Kauri Street and Rata Street.
- The carriageway around the intersection of Kauri Street and Rata Street is narrowed to 7 metres to slow vehicle speeds around the bend.
- No stopping restrictions will be introduced around this corner.

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

Kauri Street - Concept Plan



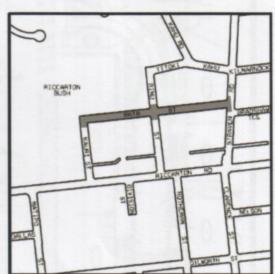
Rata Street

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

The Concept Plan

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

- The existing kerb and dish channel will be replaced with kerb and flat channel for its entire length, both east and west of the intersection with Rimu Street.
- The carriageway will be narrowed from the existing 13 metres to 10 metres with parking permitted along both sides.
- The existing parking restrictions will be maintained along the new carriageway.
- Narrowing of the carriageway to 6 metres width with kerb build-outs adjacent to No. 11/12 Rata Street and 27/32 Rata Street.

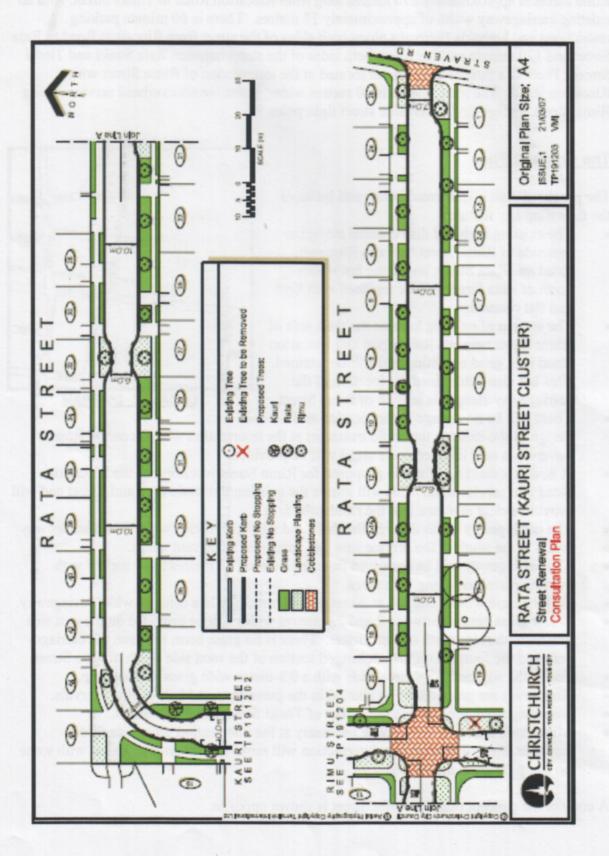


LOCALITY DIAGRAM

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

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

Rata Street - Concept Plan



Rimu Street

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

The Concept Plan

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

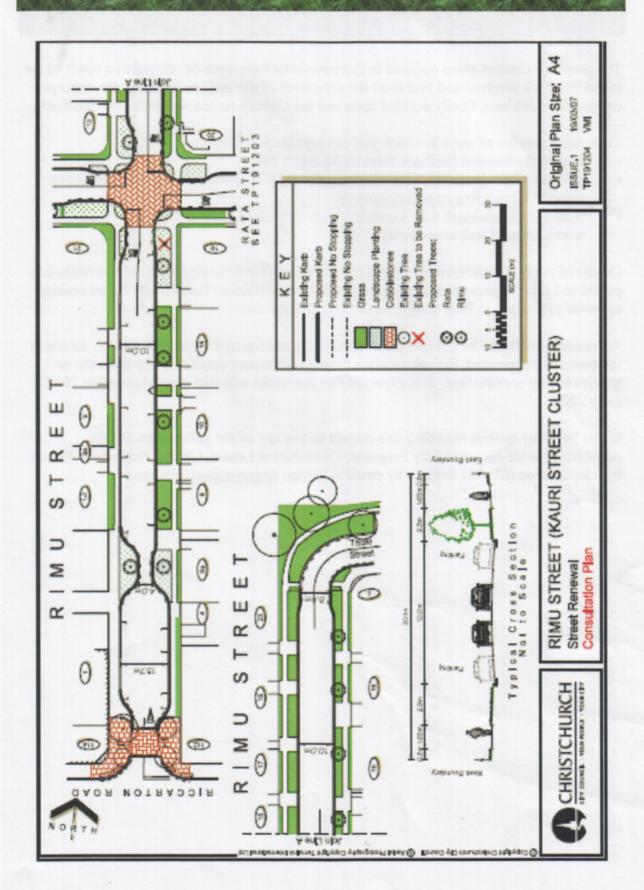
- The existing kerb and dish channel along the east side of Rimu Street between Riccarton Road and Rata Street, and along both sides north of Rata Street will be replaced with kerb and flat channel.
- The section of existing kerb on the west side of Rimu Street between Rata Street and Riccarton Road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

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



LOCALITY DIAGRAM

Rimu Street - Concept Plan



Consultation Process

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

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

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

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

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

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





www.beca.com

Christchurch Suburban Character Area Assessment

Prepared for Christchurch City Council

Prepared by Beca Ltd (Beca)

17 June 2015

Revision History

Revision Nº	Prepared By	Description	Date
1	Lynne Hancock and Anne Lassé	80% draft for Council review	4 June 2015
2	Lynne Hancock and Anne Lassé	Final draft for Council review	10 June 2015
3	Lynne Hancock and Anne Lassé	Final incorporating Council comments	17 June 2015
4			
5			

Document Acceptance

Action	Name	Signed	Date
Prepared by	Lynne Hancock and Anne Lassé	hyreful Alassé	17 June 2015
Reviewed by	Carl Lucca		18 June 2015
Approved by	Wade Robertson	Mille.	19 June 2015
on behalf of	Beca Ltd		

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Background

Christchurch City Council is undertaking a District Plan Review. As part of this review Character Areas, formerly known as Special Amenity Areas or SAMs, have been reassessed to identify whether they remain distinctive with a residential character worthy of retention. 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.

The Character Areas were originally established in the mid-1990s with the development of the Operative Christchurch City Plan, for areas within Christchurch that were considered to embody special characteristics worthy of protection. Prior to the Canterbury earthquakes of 2010 and 2011, as a result of redevelopment, there had been some erosion of the characteristics of these areas. The earthquakes further exacerbated this, with one area red zoned and others significantly damaged. In addition to this, there remains confusion over the intent and extent of control provided by the Character Area provisions within the Christchurch City Plan, the implications this has on property rights and development, and the level of protection Character Area provisions offer.

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
- 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 environments¹.

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



Contents

Bad	ckground	ii
Co	ntents	0
1	Scope and Process	1
2	Methodology	2
3	Character Area 1: Heathcote Valley Assessment	6
4	Character Area 7: Totara / Hinau / Puriri Assessment	. 12
5	Character Area 16: St James Avenue Assessment	. 18
6	Character Area 19: Church Square Assessment	. 24
7	Character Area 20: Rastrick / Tonbridge Assessment	. 30
8	Character Area 38: Clissold Street Assessment	. 35
9	Character Area 39: Mays / Chapter / Weston / Knowles Assessment	. 41
10	Character Area 40: Hawkesbury Avenue Assessment	. 47
11	Character Area 41: Naseby Street Assessment	. 53
12	Summary Table	. 59
Apı	pendix 1: Character Area site classification and boundary maps	. 63



1 Scope and Process

In June 2014 Christchurch City Council (Council) undertook a review of the 10 Character Areas located within the Central City to inform changes to the Central City Living zones of the Christchurch Central Recovery Plan. Following this, as part of Phase II of the Christchurch City District Plan Review, the remainder of the Character Areas, all within suburban areas, were prioritised for full assessment on the basis that the areas:

- 1. Provide opportunities for some level of redevelopment
- 2. Are highly intact but also at risk of 'incompatible' change resulting from various development pressures
- 3. Have sustained earthquake damage and require boundary rationalisation
- 4. Do not have appropriate aspects of character recognized through current District Plan provisions and are therefore at risk, or may be compromised by proposed changes to District Plan provisions particularly in relation to increased residential density.²

Assessment of 16 suburban Character Areas was undertaken in November and December 2014 for Council by Beca. This report summarises the assessment of a further 9 Character Areas selected for reassessment, including:

- Character Area 1 Heathcote Valley
- Character Area 7 Totara / Hinau / Puriri
- Character Area 16 St James Avenue
- Character Area 19 Church Square
- Character Area 20 Rastrick / Tonbridge
- Character Area 38 Clissold Street
- Character Area 39 Mays / Chapter / Weston / Knowles
- Character Area 40 Hawkesbury Avenue
- Character Area 41 Naseby Street

² As outlined by Christchurch City Council in their briefing document (Christchurch City Council-District Plan Review-SAMs Draft Brief 2014-11-10)



2 Methodology

A detailed breakdown of the project methodology is detailed below. The assessment was undertaken during May and June 2015.

2.1 Review of Background Documentation

Existing documentation pertaining to the 19 Character Areas was reviewed prior to commencement of desktop and site analysis. This documentation included:

- Existing Council Character Area brochures and previous assessment material
- Christchurch Urban Character Study, 2010
- Proposed Christchurch Residential Heritage Conservation Areas Report, 2010
- Council records, aerial photography and Google Street View

2.2 Desktop Analysis

With the assistance of Council's GIS team, a detailed desktop analysis was undertaken for each of the 9 Character Areas, to establish an initial understanding of the consistency and cohesiveness of the underlying character and to identify:

- Buildings lost/demolished (following the September 2010 and February 2011 earthquakes)
- Existing at-risk properties (following earthquake damage)
- Post Character Area resource consents dating from 2004 (including the modification to existing buildings, construction of new dwellings or construction of ancillary buildings)
- The location of heritage buildings
- The location of protected / notable trees.

2.3 Baseline Character Description Sheets

Based on the review of background documentation and desktop analysis, a baseline character description sheet was developed for each of the 9 Character Areas. These sheets identified the existing streetscape and residential property (landscape and built form) elements unique to each Character Area – as understood from the review of background documentation and desktop analysis.

2.4 Character Elements

The assessment of each 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. These private property elements offer the potential for incorporation of provisions within the District Plan, while streetscape elements are currently within Council control. On-site assessments have been weighted to reflect this.

Site Character Elements

While the prevalence of individual character elements varies between Character Areas it was observed that the nature and general combination of elements were consistent across all 9 Character Areas, including:

Landscape Elements

Topography and Aspect

Topography can have an influence on the character of an area. Topography (a function of slope and height) plays an important part in defining development patterns, it influences street pattern, building styles and the



amount of vegetation. The aspect (the direction an area faces relative to the sun) can influence the amount of vegetation in an area (through exposure to sun and wind) and its desirability as a place to live.

Open Space

Open spaces are areas without buildings or structures. Open space in an urban setting is provided by areas such as road corridors, river corridors, beaches, parks and reserves. Open space influences the sense of openness or containment as well as contributing to the visual, recreational and ecological value of a place. It includes:

- Location and distribution of open space and vegetation
- Type of open space (private, recreational, natural environment, conservation)
- Relationship of open space to surrounding built or natural environment (streetscapes)

Green Framework

The green framework is the predominant vegetation, as well as the scale and density of vegetation, and its relationship to the topography and built environment. It includes:

- Street trees or those located within other public, or private, spaces
- Native or exotic vegetation
- Public or private vegetation
- Strength of open space and green structure

Urban/Built Form Elements

Land Uses

The nature of an activity (e.g. residential, commercial, institutional) contributes to the character of an area. The activity can have a major influence on its physical character, including on the layout of the site and form of buildings within a neighbourhood or area.

Street, Block and Open Space Pattern

Street, block and open space patterns have influence in a variety of ways including the way in which site development occurs, the views and vistas that result, the level of enclosure or openness etc. The pattern is denoted by:

- Formal or informal grid
- Curvilinear network with or without cul-de-sacs
- Cul-de-sacs and collector streets
- Block size
- Pedestrian links
- Hierarchy of streets (e.g. collector road, suburban street)
- Lot grain

Density/ Scale/Layout

Density is a function of the amount of the land that is built on compared to what is left open or not built upon. In respect to urban character it includes:

- Lot size
- Site coverage (surface and building)
- Building heights
- Location of buildings on the site (including building setback and open space)

Building Age, Style and Type

The age, style and type of buildings have a strong influence on character. Building age and type are closely correlated, with buildings of any era having a relatively limited range of styles, particularly residential buildings. For example, early 20th century residential styles in Christchurch are typically English Domestic Revival, and the California bungalow. The range of residential ages and styles, and the consistency of styles within an area affects the overall character of a place.



Iconic Structures or Elements

Iconic structures and elements are particularly important in giving memorability to an area. This includes:

- Iconic buildings
- Iconic elements
- Landmark elements

These elements have been simplified for the purposes of the character assessment into the following matters:

- Topography and aspect
- Street and block pattern
- Lot size
- Site coverage
- Height
- Bulk and scale
- Location
- Age / Era
- Style / Type
- Materials
- Street scene interface
- Garage placement
- Open Space
- Boundary vegetation
- Fencing
- Setbacks
- Landscape treatment

2.4.1 Residential Character Classification

In respect to ascertaining the integrity and cohesiveness of each Character Area, each property was assigned a classification – of primary, contributory, neutral or intrusive – on the breadth of character elements exhibited by that property. These property classifications are further defined below:

- Primary Sites with buildings, structures, landscape, garden and other features that define the character of an area.
- Contributory Sites with buildings, structures, landscape, garden and other features that support the character of an area.
- Neutral Sites with buildings, structures, landscape, garden and other features that neither defines, supports or detracts from the character of an area.
- Intrusive Sites with buildings, structures, landscape, garden and other features that conflict/ detract from the character of an area.

The baseline for establishing whether a Character Area had sufficient integrity and cohesiveness was identified as a requirement that 80% of properties were primary or contributory properties within an area. On this basis Character Area boundaries were further refined.

Note: Properties not visible from the street / public realm have been classified as neutral – as have properties where dwellings have been demolished following the earthquakes and where sites are vacant, and where new dwellings are under construction.



2.4.2 Streetscape Character Elements

In addition, all major streets within a Character Area were assessed, using the following criteria:

- Orientation and slope flat / sloping / steep / undulating
- Key views specific features, landmarks or vistas
- Street width wide / moderate / narrow (street width is defined as the road reserve width or the public space between the property to property boundary, including berms and footpaths)
- Footpaths presence / width / condition
- Vegetation street trees / low level planting / grass berms
- Infrastructure overhead lines / power poles / street lighting
- Street furniture seats / bins / lights
- Other landscape features (stone walls, gates, relationship to nearby parks /open space etc.)

Note: Streetscapes were not classified in the Character Area in the same way as residential character due to playing a contributory role (as opposed to defining) in the establishment of character in a particular area.

2.5 On-Site Assessments

Assessments of the 9 Character Areas were undertaken over May and June 2015, using the following methodology:

- Two consultants (landscape architect and urban designer) were present at each site visit in order to assess individual properties, the streetscape and record data.
- An initial drive-through of each Character Area was undertaken before the site record sheets were completed and assessment categories confirmed. (There was initial discussion about the classification and physical extent of the Character Area at this time, which was revisited on reviewing the assessments post-site visit.)
- A slow drive or 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 Character Area and a brief outline of any initial recommendations.

Site assessments were primarily limited to investigations within existing Character Area boundaries and only considered the potential expansion of Character Areas beyond these pre-established Council boundaries where the continuation of the existing character was obvious.



3 Character Area 1: Heathcote Valley Assessment

3.1 Area Description

Character Area 1 is located in the Heathcote Valley in the south east of the city and is bounded by the railway line to the west. It consists of all the properties visible along Rollin, Marsden and Flavell Streets and Martindales Road east of the railway lines. Properties between these streets on Bridle Path Road, and on Station Road are also included.

Heathcote Valley was identified 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 weatherboard or brick houses constructed between 1900 and 1930) and the abundance of mature soft landscaping both within and at the boundaries to the properties.

The street pattern fans out from a former neighbourhood hub which originally



comprised a railway station, the pub, post office and a group of local shops. The rebuilt Valley Inn Tavern and a recent small shopfront are now the only commercial uses remaining (partly as a result of the 2010/11 Canterbury earthquakes). The street pattern has resulted in some triangular and irregularly shaped lots behind street-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 Port Hills – with differing spatial qualities, due to their different widths and the variety in lot size. The area retains a quality of 'rural edge' being nestled against the hills and visually screened from the railway line; and a sense of relative intimacy, with small to moderate setbacks and modestly scaled buildings. However, recent or current development, loss of soft landscaping, and empty lots (mostly on Rollin Street and Flavell Street) are contributing to a change in the identified Character Area character.

3.2 Streetscape Elements

The underlying topography is flat with the site located on the Heathcote Valley floor. The Port Hills maintain a strong presence with dramatic views framed by the streets. The unusual radial street layout gives the area a unique feel with Rollin, Marsden and Flavell Streets culminating at a point which is the commercial heart of the community. The area has variable street quality including variation in widths, and the presence of street trees and berms.

Station Road has notable street character with generous grass berms containing mature oak trees which provide a canopy over the street. The railway track runs adjacent to the road on the west side with a heavily planted berm facing the road. This coupled with well landscaped gardens containing mature trees provides an intimate scale with a sense of enclosure. Both Flavell and Rollin Streets are unique in scale with street widths of 11.5m and 10m respectively giving the built form a strong presence. Paved vehicle thresholds feature at both ends of these streets as well as Marsden Street. The remainder of the streets vary in width between 15m and 18m and do not exhibit any notable character with standard footpath widths and moderate asphalt carriageways.



The war memorial at the end of Flavell and Martindales Road is a notable feature and includes a central cenotaph, seating, garden beds and a low stone wall.

3.3 Site Character Elements

The following elements detail the key characteristics of Character Area 1, as contained within private properties. These characteristics can be broken down in to landscape and built form elements, as described below.

3.3.1 Landscape Elements

Setback from Street

Dwellings located within Character Area 1 have a range of building setbacks from 4 – 20m. Those on Martindales Road, Station Road and Bridle Path Roads have wider setbacks. Properties containing older housing stock average approximately 8m. The radial streets; Rollin, Marsden and Flavell Streets have smaller setbacks reflective of the more intimate street scale with properties with the properties containing original housing stock ranging from 3-6m. Little consistency remains through the Character Area now and the sense of rhythm has been eroded due to the addition of new housing with varied setbacks.³

Boundary Treatment – Planting / Fencing

High fences⁴ are present along 50% of street boundaries and consist of varying materials including timber, block, brick hedging, and metal. These fences often obscure views to houses and front gardens.

30% of houses that front the street 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. Some properties have extensive 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. Where new buildings have been designed to maximise site cover this character has been eroded.

3.3.2 Built Form Elements

Dwelling Style / Era

The area still contains a number of houses constructed between 1900 and 1930 (although some were lost in the earthquakes) and a handful remaining from the 1880s. Common architectural elements include gabled or hipped roofs (generally one or the other: there is a small number of houses with a hip / gable end combination), bay windows and verandas doubling as entrance porches. Ornamentation is limited and simple.

The original building materials in the Character Area were corrugated metal roofs, brick chimneys, timber windows and painted horizontal timber weatherboards. Many of the dwellings retaining these materials highlight architectural features in darker colours that contrast with the paler weatherboards. More recent

⁴ For the purposes of the study, fence heights were recorded as: Low – up to 1m; Medium – up to 1.5m; High – 1.6m+. These were assessed by eye, not measured, the key distinction between Medium and High is that at around 1.5m the fence is at eye height, while above that it is not easy to look over it from the adjacent footpath – thus 'High' indicates a reduced visual connection between the house and the street.



³ For the purposes of the study, setbacks were recorded as: Narrow, Medium or Wide, reflecting (approximately) Narrow – up to 3m; Medium – up to 6m; Wide – over 6m.

buildings use a mix of materials including red brick, local stone, and rendered facades, and roofs in dark metal (predominant) or terracotta tiles.

Building Scale and Form

Most earlier buildings are single storey, simple in form, and fronting the street. Newer dwellings are both larger and have more complex roof forms than the 19th and 20th century examples, although the roofs are typically lower (shallower pitched). On Rollin and Marsden Streets remain some clusters of small double-fronted cottages, with hip roofs (and skillions to the rear), while on Martindale Road are some bungalows with forward bays, with larger street setbacks, that read strongly as part of the area character. Elsewhere early buildings are interspersed with other dwellings including uncharacteristic typololgies: a 'ranch style' house over 4 consolidated lots (Rollins), and a townhouse development (spanning Flavell and Marsden) which detract from the established character for opposite reasons: higher density multiple dwellings, with a high percentage of site cover; and a very large single dwelling set to lawn on a very large lot. By contrast, a duplex (Station St) achieves an appropriate fit with the scale of surrounding buildings.

Relationship to Street / Visual Connectivity

Many of the properties have low boundary walls to match the building or medium-height timber fences, some visually permeable and some with hedges above. 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, thereby reducing the quality of the streetscape and the integrity of the area character. It is also weakened when buildings 'turn away' from the street and when a large area of the front façade is given over to blank walls or to garage doors.

3.4 Conclusion

There are clusters of dwellings that retain the coherence that determined this area as a Character Area. However, the introduction of infill (both to the rear and on the street) has created a more 'patchy' architectural character and a changed relationship to the street. The assessment found that there are no more than four houses next to each other than are either primary or contributory, and that these small clusters are across the area rather than focussed on any one street. Abundant soft landscaping in front gardens is no longer typical of the area. Of the 101 properties, 24% are primary, 14% contributory, and around 53% neutral.

3.5 Recommendation

There are insufficiently strong groupings of primary or contributory buildings to justify retention as a Character Area. However, what continues to define this area most strongly, and contribute to its unique (and charming) quality, is its setting, with the backdrop of the Port Hills. The radial street pattern, the sense of intimacy given by narrow streets and relatively small lots and buildings, and the mature oak avenue along Station Road are also important. It is considered that these aspects merit an appropriate design response, through guidance that recognises:

- Setbacks: small to moderate front setbacks 3 to 6m
- Modest scale of housing
- Simplicity of architectural style and roof forms (without forcing a particular style, but acknowledging the area history and surviving workers' cottages and early bungalows)
- Clear, direct relationship between the street and the house, particularly the front door and windows to primary rooms
- The benefits of retaining or reinstating consolidated areas for soft landscaping, through setbacks and site cover.



3.6 Site Photographs

Streetscape

The streetscape character varies due to different road widths and street tree planting. Railway Parade has a particularly strong, beautiful avenue of mature oak trees: while there are trees on the corner of Marsden Street, it and the other streets are more 'hard edged' with narrow to medium footpaths and no berms.



Martindales Road (from Station Road looking east)



Rollin Street (looking east)



Marsden Street (looking west)



Station Road (looking north)



Primary Site Classification

The primary site classification relates to the period and style of architecture, the relative intactness of original building and roof forms and modest scale of the houses, low fences that enable a strong relationship to the street, and soft landscaping in the front garden. All of these qualities together make the property 'primary'.





19 Martindales Road

23 Marsden Street

Contributory Site Classification

Contributory sites are those that have undergone some modification, whether to the building, the landscape quality or the fencing, but where most of the characteristics of primary sites are still visible on the street and consistent with the original character.



8 Marsden Street



15 Rollin Street

Neutral Site Classification

Neutral sites neither establish nor detract from the defining character values of the Character Area.





13 Marsden Street

10 Rollin Street

Intrusive Site Classification

Intrusive sites are those that detract from the defining character of the area, due to a marked change in building scale and form, a change to setbacks and building orientation in relation to the site, relationship to the street, extent and type of landscape treatment, and materiality.



9 Marsden Street



22-26 Rollin Street



4 Character Area 7: Totara / Hinau / Puriri Assessment

4.1 Area Description

Character Area 7 is north of Riccarton Road and east of Clyde Road, bounded by a tributary of the Avon River to the north, and Riccarton Bush to the south-east. It includes Totara, Hinau, Miro and Konini Streets and a major part of Puriri Street.

This area was identified as a Character Area because of the combination of mature street tree planting, large grass berms and consistently generous setbacks from the street, enhanced by well landscaped gardens including large trees and shrubs.

The street layout is curvilinear, with irregular blocks that have generated a pattern of mid-block lots, accessed by private driveways and with no street



address. Particularly deep lots, as on Totara Street adjacent to Riccarton Bush, have also typically been subdivided. The lots are also of varying sizes and shapes, and, as a result, so are the buildings they contain. However, setbacks are mostly generous, houses on the street front the street, and many gardens feature mature vegetation including canopy trees.

4.2 Streetscape Elements

The underlying topography of Character Area 7 is flat. Konini Street and Puriri Street are oriented north/south and frame views to the port hills. The area is located adjacent to Riccarton Bush and the presence of tall Kahikatea trees provides a striking backdrop to Ngahere Street, Miro Street and parts of Totara Street. Another notable feature is the Avon River which runs along the north-east and south-east boundaries of the Character Area. These two landscape features drive the crescent shaped street pattern of Totara and Hinau Streets.

There is a range of landscape treatments throughout the Character Area. Puriri Street is 20m wide and for the majority features grass berms in varying configurations. There are young street trees located in the eastern berm of Puriri Street north of Hinau Street with a variation of spacings and tree types. South of Totara Street, the carriageway of Puriri Street is much wider and there are no berms or trees. The northern end of Puriri Street crosses the Avon River where the road narrows to cross the bridge. The adjacent reserve land associated with the river contains large mature trees providing canopy enclosure and a natural boundary to the Character Area.

Totara Street varies from 18 – 20m wide. The street has trees in wide grass berms along the entire length. The tree type changes from small scale species along the west end to large scale canopy forming species between Puriri Street and Kahu Road. From Kahu Road north the trees are young and are yet to contribute a largely on the street character. Hinau Street is 19m wide and contains small scale street trees of varying age and wide grass berms on both sides along its entirety.

Konini Street is 20m wide and contains small grass berms adjacent to properties as well as small grass berms adjacent to the road carriageway containing mature small scale trees. The grass berms are being eroded from parked cars and in places there are rocks used as parking deterrents. Miro Street is a small connector street running between Totara and Hinau Streets and is 20m wide. It features a wide berm on the north-east side containing grass and planting and a narrow berm on the south-west side. Ngahere Street is a



cul-de-sac street terminating at Riccarton Bush with narrow grass berms adjacent to properties. This is key pedestrian and cycle connection.

A consistent theme throughout the Character Area is the presence of raised vehicle tables with a paved surface treatment at intersections. This is often coupled with the presence of vegetated berms and road narrowing.

4.3 Site Character Elements

The following elements detail the key characteristics of Character Area 7, as contained within private properties. These characteristics can be broken down into landscape and built form elements, as described below.

4.3.1 Landscape Elements

Setback from Street

Dwellings located within Character Area 7 have a range of bulding setbacks from 3 - 40m. The setbacks are consistently generous however lack relationship to each other.

Boundary Treatment – Planting / Fencing

High fences are present along 70% of street boundaries and consist of varying materials including timber, concrete block, brick, hedging, stone and metal. These fences often obscure views to houses and front gardens. 40% of houses that front the street have garages located at the front of properties. This is a feature of both new housing typologies and older housing which has been added to, and forms a visual barrier between the street and the dwelling.

Landscape Characteristics

Features that make up this Character Area include: generous side setbacks, the presence of rear and side canopy and large amounts of mature vegetation. Gardens have a strong street presence and often frame the architecture. The front yard character has been greatly eroded in places with new duplex and large scale single dwellings, the presence of dominant driveways and areas of hardstand.

4.3.2 Built Form Elements

Style, Era and Form

The original house style is single and double storey Californian-style bungalows from the 1920s and 1930s, 40% of which remain. These houses feature gable and hip roofs, large dormer windows facing the street, shingle gable ends, weatherboard cladding and architectural detailing. The remaining 60% comprises an eclectic mixture of varying types and ages including contemporary brick houses, new weatherboard homes, modern plaster rendered homes and duplexes.

Building Scale and Form

Most dwellings are single or double-storey detached single family homes with generous street frontage. More recent developments are spotted throughout the area and have introduced infill, large house typologies and the creation of duplexes. This change in bulk and scale detracts from the character of the area due to minimising available land for vegetation and landscaping and giving higher prominence to the buildings.

Relationship to Street / Visual Connectivity

The original bungalows feature large windows on the front façade. Due to the placement of high fences throughout much of the Character Area the visual connection has been somewhat lost. The generous setback and the use of vegetation as a screen in some instances also diminish connectivity. Garages and fences to newer houses typically block views from the street.



4.4 Conclusion

Approximately half the dwellings and properties retain the character that determined this area as a Character Area. The properties are spread throughout the area with the largest cluster containing nine properties. The overall coherence of the area has been significantly eroded through new development that occupies a greater site area and some infill development. This has resulted in a very 'patchy' architectural character and there are a significant number of high fences and garages at the fronts of properties. Whilst setbacks have little relationship to each other, the Character Area has maintained consistently wide set-backs of 8m or greater. The assessment shows that of a total of 224 assessed properties, 12% are primary, 36% are contributory and 33% are neutral.

4.5 Recommendation

There are insufficient groupings of primary and contributory properties for this area to be retained as a Character Area. The mixture of building types, materials and the presence of high fencing and garages make it difficult to form consistent criteria. The area does however have a few defining elements that have merit. The elements include; the quality of the streetscape (particularly Totara Street), the large building setbacks, the visual relationship to Riccarton Bush and the Avon River and the resulting unusual street layout. It is considered that these elements merit an appropriate design response, through guidance that recognises:

- Setbacks: Large with a minimum of 8m
- 1-2 storey single family dwellings
- Large side setbacks.



4.6 Site Photographs

Streetscape

The photographs below illustrates that several of the streets have a strong character due to wide grass berms, planted berms in places and mature street trees that unify the streetscape. Mature trees in front gardens supplement the street tree planting in some areas (particularly Puriri Street).



Totara Street (looking south-west)



Hinau Street (looking north-east)



Miro Street (looking south-east)



Ngahere Street (looking north-west)



Puriri Street



Primary Site Classification

The primary site classification relates to the period and style of architecture, the relative intactness of original building and roof forms, the relatively modest scale of the houses, a high degree of transparency to the street and soft landscaping in the front garden. All of these qualities together make the property 'primary'.





74 Hinau Street

23 Konini Street

Contributory Site Classification

Contributory sites are those that have undergone some modification, whether to the building, the landscape quality or the fencing, but where most of the characteristics of primary sites are still visible on the street and consistent with the original character.



19 Konini Street



15 Ngahere Street

Neutral Site Classification

Neutral sites neither establish nor detract from the defining character values of the Character Area.





3 Miro Street 112 Totara Street

Intrusive Site Classification

Intrusive sites are those that detract from the defining character of the area, due to a marked change in building scale and form, a change to setbacks and building orientation in relation to the site, relationship to the street, extent and type of landscape treatment, and materiality.



77 Hinau Street



20 Ngahere Street

5 Character Area 16: St James Avenue Assessment

5.1 Area Description

Character Area 16 in Papanui covers the length of St James Avenue from Harewood Road to Windermere Road. It was identified as a Character Area due to its consistent and intact housing pattern, being mostly weatherboard inter-war bungalows or villas, with low-pitched hip roofs, gable ends with shingles, large windows including bay or bow windows, and porches or verandahs addressing the street. The regular rhythm given by the layout of buildings on their sites – a narrower side setback on one side, a wider one on the other to accommodate driveways – supported that pattern.

Along St James Avenue, mature street trees on wide grassed berms, and established trees and shrubs in deep front



gardens, contribute to the streetscape and to pedestrian amenity. There has however been substantial development at the rear of properties, resulting in the loss of both front and side landscape area (lost to access driveways) and of rear gardens including canopy trees. North of the entry to St James Park, this has affected the development pattern to a significant degree on the east side of the street and has also noticeably affected a portion of the west side.

5.2 Streetscape Elements

The underlying topography is flat with long views to the Port Hills in the south-east and medium views into St James Park. St James Avenue changes direction three times as it makes its way along the railway line and then around St James Park which fronts the street in two locations. Whilst the street has a consistence width of 20m throughout, the street quality is variable with several treatments throughout the length.

The south end (Windemere Road – Dalriada Street) features medium sized grass berms containing young street trees and road narrowing including planted berms and a paved vehicle table at the intersection with Bellvue Ave.

The middle section of St James Avenue (Dalriada Street – 75 St James Ave) features medium grass berms at footpath level and medium grass berms containing medium sized street trees at road level. The lower grass berms have been eroded in places from use as car parking.

The south end of St James Avenue (75 St James Avenue – Harwood Road) features medium grass berms at footpath level and medium grass berms containing mature street trees at road level. These are consistent and provide a canopy giving a sense of enclosure and thus enhancing the character of the streetscape and pedestrian environment.

Halfway along St James Avenue a small creek, partly channelized and partly naturalized, runs east-west through the area and has a presence in several front gardens on both sides of the road.



5.3 Site Character Elements

The following elements detail the key characteristics of Character Area 16, as contained within private properties:

5.3.1 Landscape Elements

Setback from Street

While there is a large variation in building setbacks across the Character Area (from 4 to 13m) there are small pockets with some consistency. Variations are a result of subdivision and the erection of new housing including duplex and row housing. The street layout and the presence of the creek also provide some natural variation

Boundary Treatment - Planting / Fencing

High fences are present along 50% of street boundaries and consist of varying materials including timber, block, brick, hedging, and metal. These fences often obscure views to houses and front gardens.

40% of houses that front the street 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.

Landscape Characteristics

The northern part of the street is affected through the introduction of duplex and row housing. This has resulted in the built form occupying a greater proportion of the site. The southern portion of St James Ave therefore has a higher proportion of mature landscaped front gardens as well as side and rear canopy. This gives the area a more spacious feel with the vegetation often framing the building.

5.3.2 Built Form Elements

Style / Era

Many of the houses fronting St James Avenue are villas or inter-war timber bungalows, some with modifications including rooftop additions, new porches or verandah enclosures, and garages either 'side on' to the front boundary or facing the street. Original features include hip roofs, or hip and gable combinations with the gable ends decorated. Infill development comprises both single dwellings at the rear, whose garages are often more visible from the street than the house itself, and more commonly attached, multi-unit dwellings (townhouses, duplexes) that are laid out down the length of the lot and accessed from a side driveway.

Building Scale and Form

The original subdivision saw detached, well spaced and mostly single-storey homes built among generous garden areas. A single storey scale prevails but the built form setting has changed with intensification, particularly through townhouse-type developments with a larger footprint, larger roof areas and higher site coverage. Roof forms for new development are generally more complex and shallower in pitch than the original buildings, although they also include monopitch and flat roofs. Rooftop additions have also altered the appearance and the scale of older buildings in relation to their sites and the streetscape. Built form and scale is now appreciably mixed through the Character Area.

Relationship to Street / Visual Connectivity

Large windows facing the street enable a positive relationship with the street and a strong sense of 'address'. That open and direct visual connection between houses and the street has been compromised by the addition of garages at the front boundary, and by higher fencing, both of which partially obscure the houses. Some newer properties also have large areas of blank façade, with small or no windows, to the front, further undermining visual connectivity.



5.4 Conclusion

Opposite and south of St James Park this Character Area retains a coherent architectural character consistent with the area definition, along with mature planting in front gardens. This is also the part of the Character Area with the most consistent lot widths and side setbacks – that is, where there is an identifiable rhythm of houses and spaces between them along the street. While over the whole Character Area the percentage of primary and contributory lots is only 20%, in this smaller area, for the lots fronting the street, it is 82% (31 out of 38 lots).

5.5 Recommendation

It is recommended that Character Area 16 be redefined to focus on the area south of St James Park. The characteristics that warrant retention and protection are:

- Building height and scale 1-2 storey detached houses
- Built form orthogonal footprints with forward bays, medium-pitched hipped gable roofs (roofs or roof extensions are secondary to the main building)
- Generous front setbacks minimum 6m
- Garages located / designed so as to:
 - not obscure character houses (for example orienting them to the side, limiting their width so as not to block clear views between the street and the front door) and
 - be recessive in relation to the front building line of new houses (for example by being set back, not dominating in terms of scale)
- Side setbacks that are narrow on one side and wide on the other
- Low fencing; or medium fencing with some transparency (eg. timber picket, hedging); with high fencing limited to 50% of the lot frontage
- Architectural detail: elements of existing buildings to be protected include decorated gable ends, bay or bow windows, decorated verandahs or entry porches, and timber (horizontal) cladding. These are not recommended to be replicated on contemporary buildings but their function, breaking down and adding depth to the facades, is encouraged to be interpreted.



5.6 Site Photographs

Streetscape

Wide grassed berms and street tree planting characterise St James Avenue. The trees are younger towards the southern end of the street (refer photo left, below) and more mature towards the north-east where they are in the carriageway (forward of the footpath) and create a strong sense of enclosure to the streetscape.



St James Avenue (looking north)



St James Avenue (looking north-east)

Primary Site Classification

The primary site classification relates to the period and style of architecture, built form, scale and materials, and a generous street setback with landscaped front gardens, and the house, visible from the street. All of these qualities together make the property 'primary'.





35 St James Avenue

73 St James Avenue

Contributory Site Classification

Contributory sites are those that have undergone some modification, whether to the building, the landscape quality or the fencing, but where most of the characteristics of primary sites are still visible on the street and consistent with the original character.



49 St James Avenue



16 Windermere Road

Neutral Site Classification

Neutral sites neither establish nor detract from the defining character values of the Character Area.





50 St James Avenue

90 St James Avenue

Intrusive Site Classification

Intrusive sites are those that detract from the defining character of the area, due to a marked change in building scale and form, a change to setbacks and building orientation in relation to the site, relationship to the street, extent and type of landscape treatment, and materiality.



72 St James Avenue



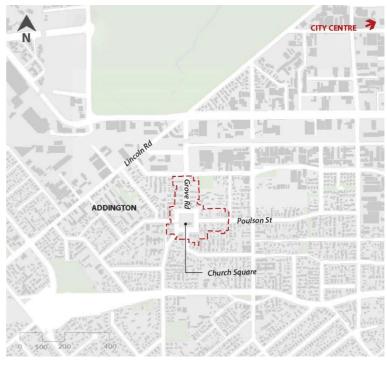
105 St James Avenue

6 Character Area 19: Church Square Assessment

6.1 Area Description

Character Area 19 is located in Addington and consists of the properties fronting onto Church Square, the first block of Grove Road to the north of the Square, and the first block of Poulson Street to the east of the Square. It was identified as a Character Area to recognise and reinforce a 'village green' focussed around St Mary's Church and which the church grounds establish. St Mary's, its grounds, and lych-gate are listed in the Christchurch City Plan as Group 1 Heritage items in recognition of their architectural, historical and cultural significance.

The underlying street pattern is generated by the church. It is based around the strong axes of Poulson Street (running



east west) and Grove Road / Ward Street (running north-south), modified by the diagonal of Collins Street, all of which draw the eye towards and through the square. Around the square the streets have been narrowed and partly closed to vehicles, which, together with extensive planting, helps to reinforce that this is a slow-speed environment and community 'heart'. This is in strong contrast with the change to large scale residential, educational and commercial buildings along Harman Street at the northern extent of the Character Area. The street and subdivision layout has resulted in a mix of building orientation, some facing towards the square, some side on to it. Lot sizes – and the buildings – also vary in size and shape. Buildings vary too in use, age, landscaping, and condition.

6.2 Streetscape Elements

The underlying topography is flat with short-medium length views towards Church Square, the defining element of the streetscape character. The street layout wraps around the square with Grove Road and Poulson Street meeting the square at a perpendicular angle. The square itself features large mature trees, pedestrian connections, seating areas, parkland, low level planting and the church itself.

Street widths in the Character Area are wide varying from 18 – 25m. The internal side of the Church Square streetscape reads as part of the open space created by the church land. There is a high degree of streetscape amenity featuring paved road surfaces at corners and intersections, narrow carriageways, very wide grass berms and mature street trees throughout. This creates an overall intimate feel to the area.

6.3 Site Character Elements

The following elements detail the key characteristics of Character Area 19, as contained within private properties. These characteristics can be broken down in to landscape and built form elements, as described below.



6.3.1 Landscape Elements

Setback from Street

The distances that dwellings are set back from the street are varied and range from approximately 1.5 – 12m. This variation is a result of a large amount of infill development which includes duplex and row housing.

Boundary Treatment - Planting / Fencing

Boundary treatments vary throughout with 55% of street facing properties having low - medium or no fence. This results in a fairly high degree of visual connectivity being achieved within this Character Area. Where fences do exist there is a range of materials present including timber, metal, hedging, concrete block, brick and plaster render. The presence of this fencing reduces the overall continuity and coherence of the area.

Landscape Characteristics

The landscape features of the area include front lawns to some properties, mature vegetation of various type and sizes and presence of large mature trees which both frame and filter views to the buildings.

There is a large proportion of infill development which has eroded the open space giving way to large scale built form, dominant areas of hardstand and very small building setbacks. This has diminished the quaint small scale nature of the properties as a whole.

6.3.2 Built Form Elements

Style / Era

Buildings are mixed in terms of period, size, style, setbacks, type, materials and colours. They range in age from the 1870s (in the immediate vicinity of the square) to the present (two new dwellings under construction on the corner of Poulson St (west) and Church Square). Older houses are typically timber with metal roofs, but also include render (later cladding) and tiled roofs.

Building Scale and Form

There is no consistency in scale and form across the Character Area, whether of the main building or the roof. It encompasses detached small late 19th century cottages, large early 20th century houses, attached 2-storey townhouses, 1-storey row housing, and commercial offices.

Relationship to Street / Visual Connectivity

Low (or no) fences characterise the area, enabling clear visual connections between the street and the houses. Timber picket fences, of medium height, similarly support this relationship. Where there are higher solid fences, or very densely planted front setbacks to older properties, or where new development does not 'front' the street but has garages, small windows and large areas of blank wall on the front façade, this relationship and the quality of the streetscape is compromised.

6.4 Conclusion

This area contains an eclectic mix of diverse building types, periods and materials, with no one characteristic that ties them together. What unifies them is the open space and strong planting around St Mary's Church, and the extension of the planting as avenues of street trees that reinforce the central focus – that is, the streetscape. 10% were assessed as primary, 29% as contributory, 33% as neutral and 28% as intrusive.

6.5 Recommendations

This Character Area is not recommended to be retained. Its diversity and the increasing intensity of development in and around it make it difficult to apply any one set of criteria that make up an identifiable character. Size, height, type, materials, colour, period, setbacks, relationship to the square – there is



significant variation throughout. Newer developments are typically multi-dwelling and particularly inconsistent with the original identified character.

Notwithstanding the above, the area does offer opportunity to establish a unique character around the existing set piece of the Church Square and build upon existing elements (albeit not the same as the original Character Area characteristics set out). By way of example, there is a development under construction at the time of the assessment, of two 9-star (sustainable) houses to the west of the square could well serve as a model for future development – and a new character. There also remains the opportunity to guide development in the immediate vicinity of the square (and thus strengthen its set piece in the community) through:

- Limiting subdivision of lots edging the square such that the pattern of individual houses relating directly to the square is retained and strengthened
- Houses on corners overlooking / addressing both streets (i.e. both facades have windows to the street and/or square)
 - The existing Character Area recommends a minimum 4m street setback. It is considered that this
 could be more flexible, based on the relationship to neighbouring buildings.
- Encouraging 1-2 storey building envelopes and roof forms that are 'unfussy' so that the church buildings and grounds continue to be the dominant elements.



6.6 Site Photographs

Streetscape

Church Square itself, and the streets running off it, feature large mature trees that dominate and soften the streetscape. The street trees frame views towards the square and visually 'stitch together' disparate building types and styles. The vegetation in the public domain is the primary defining quality of this Character Area.



Church Square (looking south)



Church Square (looking east)



Grove Road (looking north)



Poulson Street (looking east)

Primary Site Classification

The primary site classification relates to building type and scale, the degree to which the buildings contribute to the sense of the church 'village green' and a strong visual connection / relationship to the street. The relative intactness of original building and roof forms was also considered.





28 Grove Road

1B Church Square

Contributory Site Classification

Contributory sites are those that have undergone some modification, whether to the building (in this Character Area usually through loss of original features, and later cladding), the landscape quality or the fencing, but where most of the characteristics of primary sites are still visible on the street and consistent with the original character.







7 Grove Road

Neutral Site Classification

Neutral sites neither establish nor detract from the defining character values of the Character Area.





25 Church Square

18 Church Square

Intrusive Site Classification

Intrusive sites are those that detract from the defining character of the area, due to a marked change in building scale and form, a change to setbacks and building orientation in relation to the site, relationship to the street, extent and type of landscape treatment, and materiality.



29 Church Square



85 Poulson Street

7 Character Area 20: Rastrick / Tonbridge Assessment

7.1 Area Description

Character Area 20 is a small area just north-east of the city centre, including lots fronting Rastrick Street, Tonbridge Street, the eastern side of Shrewsbury Street and the east end of Andover Street. It was identified as a Character Area because of the strong relationship between the buildings and the street, abundant mature landscaping within properties, and "the general consistency in terms of scale and form of the buildings". Interestingly, the wide variety in building size was also noted; today it is difference, rather than similarity, in building stock that stands out.



7.2 Streetscape Elements

The underlying topography is flat. The site

is bounded by Papanui Road commercial area to the south-east and St Margaret's College to the north, and its southern corner touches the a curve of the Avon River that in turn bounds Hagley Park. Views south along Shrewsbury Street terminate at the trees which line the Avon River in Hagley Park. Views are otherwise contained within the streetscape due to short narrow streets and the dog-leg shape of Tonbridge Street.

The streetscape character of the area is intimate with Tonbridge and Andover Streets both 10m in width. They have footpaths on both sides and planted berms, some of which contain trees, protrude into the carriageway. Rastrick Street is even narrower at 8m wide and has a footpath on the north side of the road only, with a consistent presence of planted berms and trees along its length. Shrewsbury Street has a more open feel – although still relatively narrow – with a 12m width and a lack of trees and planting.

7.3 Site Character Elements

The following elements detail the key characteristics of Character Area 20, as contained within private properties. These characteristics can be broken down in to landscape and built form elements, as described below.

7.3.1 Landscape Elements

Setback from Street

There are inconsistent setbacks from the street due to the introduction of large modern homes and higher density housing such as row-housing and duplex housing. Front yard setbacks range from approximately 2 - 10m. Variation in setback disrupts the pattern on the street and limits opportunity for landscaping in the front of buildings. Medium setbacks of up to 7m make up 55% of the street front properties giving the architecture a strong presence on the street.

Boundary Treatment – Planting / Fencing

50% of properties have high fences along street boundaries which consist of varying materials including timber, render, block, brick, hedging, and metal. These fences often obscure views to houses and gardens.



40% of houses that front the street have garages located at the front of properties. This is a feature of both new housing typologies and where older housing stock has been modified, and forms a visual barrier between the street and the dwelling.

Landscape Characteristics

The style and composition of landscape treatment within properties is highly varied. Those properties with older housing styles have mature vegetation often including rear canopy whereas many newer builds tend to have very minimal landscape contribution as are dominated by built form and hard surfacing.

7.3.2 Built Form Elements

Style / Era

The original housing style of the Character Area is small single storey workers' cottages built in the 1870s, of which very few remain. These houses have a number of consistent elements including hip roofs, verandas, timber windows, and weatherboard cladding. Over time a wide variety of housing types and styles has been introduced to the area including wooden bungalows from the early 1900s, brick and block duplexes and apartments, the multi-unit Tonbridge Mews from the early 1970s (which influenced the architectural style of subsequent new builds or alterations) rendered and block row-housing apartments from the 1990s, and new architecturally designed homes.

Building Scale and Form

There is a broad mixture of housing scales and types across the Character Area. Original housing types are small scale, single storey detached dwellings. Evolution of the neighbourhood has meant the introduction of larger single storey homes, double storey detached dwellings, single and double storey duplexes, together with two large scale multi-unit, 2-3 storey apartment blocks. The newer of these (on Rastrick Street) is particularly dominant in the streetscape.

Relationship to Street / Visual Connectivity

Original workers' cottages feature large windows and doors on the front façade. This when coupled with low fences provides a strong visual connection to the street; however nearly all of these now have high fences screening the dwellings. There is a lack of consistency amongst the newer dwellings. While most have some form of relationship to the street this is diluted by the presence of garages and fences.

7.4 Conclusion

Only some 20% of the assessed properties retain the coherence that determined this area as a Character Area. These sites are spread throughout the area and are surrounded by infill housing, row housing of up to three storeys high and other newer dwellings which tend to occupy a greater site area. The character of the area has therefore been significantly eroded. There is an eclectic mixture of materials, setbacks and architectural styles. Of the 31 assessed properties 13% are primary, 8% contributory and 32% neutral. Notwithstanding the mixed quality of the private domain, the narrow nature of the streets and the presence of consistent planting along Rastrick Street provides a unique sense of intimacy to the area.

7.5 Recommendation

It is not recommended that this area remains as a Character Area due to lack of consistency and the minimal numbers of primary and contributory sites. The earlier Tonbridge Mews development and the more recent introduction of townhouses on Rastrick Street, together with duplexes and infill throughout, tip the balance towards a more intense built form character. Design guidance that helps moderate the scale of this larger building type (if 3 storeys continues to be enabled) would partly protect the character that does remain.



7.6 Site Photographs

Streetscape

The streetscape photos below illustrate the unique narrow nature of the streets and the presence of planting and trees in some locations that both softens the streetscape and visually narrows it further.



Rastrick Street (looking north-east)



Tonbridge Street (looking north-west)



Andover Street



Shrewsbury Street

Primary Site Classification

The primary site classification relates to the period and style of architecture, built form, scale and materials, consistent street setbacks with small front gardens, and low (or open) fences that allow a strong visual connection to the street. All of these qualities together make the property 'primary'.





79 Andover Street

39 Tonbridge Street

Contributory Site Classification

Contributory sites are those that have undergone some modification, whether to the building, the landscape quality or the fencing, but where most of the characteristics of primary sites are still visible on the street and consistent with the original character.



36 Shrewsbury Street



7 Rastrick Street

Neutral Site Classification

Neutral sites neither establish nor detract from the defining character values of the Character Area.





28A Tonbridge Street

17 Tonbridge Street

Intrusive Site Classification

Intrusive sites are those that detract from the defining character of the area, due to a marked change in building scale and form, a change to setbacks and building orientation in relation to the site, relationship to the street, extent and type of landscape treatment, and materiality.



40 Tonbridge Street



18 Rastrick Street

8 Character Area 38: Clissold Street Assessment

8.1 Area Description

Character Area 20 lies to the north of Hagley Park and to the south of Innes Road. It covers the length of Clissold Street from Merivale Lane to Andover Street.

This was identified as a Character Area due to the quality of the streetscape and the strong relationship between houses, their landscaped front gardens, and the street. Mature deciduous street trees on both sides, wide grass berms and deep, regular front setbacks provide a coherent setting for the housing stock, which is a balance of original inter-war timber bungalows (some with modifications) and more contemporary homes.



The street layout around the Character

Area is an orthogonal grid, with blocks of varying depths. The lots on the west side of Clissold Street share a rear boundary with those on Hewitts Road (except where they have been subdivided for infill at the rear); the deeper block between Clissold Street and Winchester Street has resulted in an additional 'layer' of buildings down the centre, behind Clissold Street. Within the Character Area lot widths vary, and with them the width (and depth) of buildings. Houses are oriented to the street and have fairly consistent front setbacks. High front fences and garages in front yards have, however, undermined the open, landscaped character that was the original setting for the houses.

8.2 Streetscape Elements

The underlying topography of the Character Area is flat with the street framing views to the mature trees in Hagley Park to the south. Clissold Street forms part of an orthogonal street network and is 20m wide. The street features wide grass berms both sides of the road containing consistent medium sized trees spaced approximately every 15m. Both ends of the street have paved vehicle thresholds and planted berms.

8.3 Site Character Elements

The following elements detail the key characteristics of Character Area 38, as contained within the private realm. These characteristics can be broken down in to landscape and built form elements, as described below.

8.3.1 Landscape Elements

Setback from Street

Dwellings have inconsistent building setbacks from the street due to the addition of large modern homes as well as higher density housing such as row-housing and duplex housing. Front yard setbacks range from approximately 3 -10m. Properties containing original dwellings often have the larger setbacks allowing room for a front garden. Variation in setback disrupts the pattern on the street and gives more prominence to the architecture due to limited provision for vegetation.



Boundary Treatment – Planting / Fencing

High fences are present along 75% of street boundaries and consist of varying materials including timber, render block, brick, hedging, and metal. The use of fences often obscures views to houses and front gardens. Hedging is a common landscape feature in this Character Area with 25% of street fronting properties featuring hedging along the boundary. 40% of houses that front the street have garages located at the front of properties. This is a feature of both new and old housing typologies and forms a visual barrier between the street and the dwelling.

Landscape Characteristics

Landscaping within properties varies throughout the Character Area. Properties with original houses often contain mature landscaping including side and rear canopies creating a garden setting which frames the architecture. This character has however been somewhat eroded as new dwellings have been constructed that typically cover more of the site, reducing landscape area.

8.3.2 Built Form Elements

Style / Era

There is a range of periods and styles represented in this Character Area, from Victorian single bay cottages and villas to California bungalows from the 1920s and through to contemporary houses. The cottages feature timber weatherboards, metal roofs, an entry porch or roofed verandah integrated with the forward bay, and modest decoration to the gable end. The several larger bungalows, whether 1 or 2 storeys, are also timber with metal roofs, have more detailing to porches and bay windows fronting the street, and steeper pitched roofs.

Contemporary housing tends to a simple form with flat facades with openings 'punched' into them, gable roofs with no eaves overhang, and greater site coverage with more hard surfaces.

Building Scale and Form

Clissold Street presents as a predominantly single dwelling streetscape with some notable departures for multi-unit housing that are out of keeping in form and scale. These include two-storey townhouses of different types: one large footprint building 'down the lot' (accessed from a side driveway); and immediately opposite, a group of 8 attached dwellings with uncharacteristically small bulk and roofs, that step away from the street. Recent single dwellings are either two storey, or single storey with large roofs. The cottages and villas that remain are largely unchanged in terms of their presentation to the street, but modifications in the form of enclosed porches and large dormers to the timber bungalows have changed the form of most of them.

Relationship to Street / Visual Connectivity

The visual connection between houses and the street is stronger on the west side of the street, particularly where there are low to medium fences (brick, render, timber picket) and hedges. Hedges atop low walls or behind picket fences are a feature of the earlier cottages and villas. Higher, solid fences and garages placed at the front of the site partially obscure views of the gardens and houses; and where there are garages there is also an increase in the amount of hard surface and a corresponding decrease in the ability of front gardens to contribute to the landscape character of the street.

8.4 Conclusion

Clissold Street was identified as a Character Area primarily for the landscape and streetscape relationship (rather than a particular architectural period). It has lost the consistency of front setbacks and their relationship to the street built form. Most fences are high and most of the infill buildings are also unsympathetic to the original single dwelling scale and form, which further erodes the identified character. The western side of the street retains more of the original housing stock (albeit with modifications) but given the degree of change to the eastern side the street no longer 'reads' as one place – that is, as a coherent



composition. What does remain strong is the public domain, with regular spaced street trees and grass berms. This is not enough however to unify the disparate building stock, front fences and front gardens.

8.5 Recommendation

Clissold Street is not recommended to be retained as a Character Area. There are some characteristics that could be supported through design guidance, but these are not unique to this area and could be applied throughout the wider neighbourhood:

- Building height and scale 1-2 storeys, with the roof forms subservient to the main building
- Building type multi unit dwellings, if permitted, should have the front dwelling present to the street (including its front door being visible, and at least one windows in the front façade to a primary space)
- Front setbacks medium to generous, in the range 6 10m
- Garages located / designed so as to:
 - not obscure character houses (for example orienting them to the side, limiting their width in relation to the lot frontage so as not to block clear views between the street and the front door) and
 - be recessive in relation to the front building line of new houses (for example by being set back, not dominating in terms of scale)
- Side setbacks that allow for a soft edge to any new side driveways (particularly if a site is subdivided for infill at the rear) to minimise the area of hard paving / optimise the area for planting and to retain the house-space-house rhythm that is characteristic of the area. A 3.2m setback would achieve this comfortably
- Low fencing; or medium fencing with some transparency (eg. timber picket, hedging); with high fencing limited to 50% of the lot frontage.



8.6 Site Photographs

Streetscape

Clissold Street has a high amenity streetscape, given by very wide grass berms, with street trees at regular intervals, and landscaped garden beds / buildouts at the corners.



Clissold Street (looking north-west)



Clissold Street (looking south-east)

Primary Site Classification

The primary site classification relates to the period and style of architecture, built form, scale and materials, consistent street setbacks with landscaped front gardens, and low fences that allow a strong visual connection to the street. All of these qualities together make the property 'primary'.





44 Clissold Street

51 Clissold Street

Contributory Site Classification

Contributory sites are those that have undergone some modification, whether to the building, the landscape quality or the fencing, but where most of the characteristics of primary sites are still visible on the street and consistent with the original character.



29 Clissold Street



24 Clissold Street

Neutral Site Classification

Neutral sites neither establish nor detract from the defining character values of the Character Area.





37 Clissold Street

21 Andover Street

Intrusive Site Classification

Intrusive sites are those that detract from the defining character of the area, due to a marked change in building scale and form, a change to setbacks and building orientation in relation to the site, relationship to the street, extent and type of landscape treatment, and materiality.



30 Clissold Street



31 Clissold Street

9 Character Area 39: Mays / Chapter / Weston / Knowles Assessment

9.1 Area Description

Character Area 39 lies to the north east of Papanui Road and the north west of Innes Road. It is bounded by Papanui Road to the south east and covers the length of Chapter Street, and parts of Mays Road, Weston Road, Knowles Street and Bretts Road. It was identified as a Character Area because of the mature street trees on both sides of the streets, large grass berms, the substantial distance that the houses are set back from the street and the well landscaped front gardens visible from the street. There is a mix of housing from traditional timber villas and bungalows to brick and tile townhouses. one to two storeys in height. The character of this area has changed due to the addition of high fences and garages, reducing the visual connection from the street.



The area has a rectangular grid block structure, with slight variations that accommodate tributaries of the Avon River that run east-west. Houses front the street and in the original subdivision pattern rear gardens backed on to each other. The area has some well landscaped gardens, incorporating both large trees and shrub planting. The deep blocks have enabled mid-block infill development. Where this has occurred and there are either dwellings at the rear or townhouse development down the lot (pockets, notably on Mays, Weston and Knowles towards Bretts Road), it has resulted in loss of vegetation, large driveway areas interrupting the 'softer' landscaping, and a visible 'shift' in building type and street presentation (typically with a loss of street address).

9.2 Streetscape Elements

The underlying topography is flat and the orthogonal street grid promotes long views terminating at the Port Hills in the south and St Andrews College grounds in the west.

Streets are consistently 20m wide with grass berms of varying widths. Knowles Street, Weston Road, Chapter Street, and Bretts Road all feature footpaths both sides with wide grass berms containing street trees. In addition Knowles Street, Weston Road, Bretts Road and the western end of Chapter Street have sections of planted berms and narrowed carriageways. The eastern end of Chapter Street moves away from the orthogonal grid pattern (driven by the presence of a small creek running east west through the area) and has older trees which are planted within grass berms at road level. Mays Road has wide grass berms, footpaths on both sides, planted berms associated with intersections and some street trees. The trees are however less consistent than other streets in the Character Area and the grass berms have been eroded with the intrusion of parking bays. Papanui Road has a very different character comprising of wide footpaths, a bus lane on the east side, and a cycle lane on the west side leaving no room for planting or grass berms.

There is a strong pedestrian and public transport network in the area which includes a bus shelter on Papanui Road, seating associated with bus stops on Mays Road, crossing islands on Papanui Road and at the west end of Chapter Street and Mays Road. In addition this Character Area features paved vehicle tables at most intersections throughout. This is often coupled with road narrowing and planted berms.

A creek, partly channelized and partly naturalized, runs north-south through the area and has a presence in



some front gardens and notably on Weston Road where a pedestrian bridge spans it to link the footpath.

9.3 Site Character Elements

The following elements detail the key characteristics of Character Area 39, as contained within private properties. These characteristics can be broken down in to landscape and built form elements, as described below.

9.3.1 Landscape Elements

Setback from Street

Dwellings have a variety of building setbacks from the street and range from 2 – 30m. This is due to the addition of large modern homes and variation to maximise sun on the north and south sides of the street. The majority of the Character Area features wide setbacks, moderate single storey dwellings and large front yards containing mature planting. This gives the landscape a lot of prominence providing a garden setting for the architecture. Both the west end of Knowles and Chapter Streets have medium setbacks on the north side of the road due to a change in dwelling type to large two storey single family homes. The dwellings on these properties have a strong presence on the street.

Boundary Treatment – Planting / Fencing

High fences are present along 75% of street boundaries and consist of varying materials including concrete block, timber, plaster render, hedging, brick and metal. The use of fences often obscures views to houses and front gardens. 35% of houses that front the street have garages located at the front of properties. This is a feature of both new and old housing typologies and forms a visual barrier between the street and the dwelling.

Landscape Characteristics

Features that make up this Character Area include: generous front and side setbacks, the presence of rear and side canopy and large amounts of mature vegetation. Gardens have a strong street presence and often frame the architecture. The character has been greatly eroded in places with new large scale single dwellings, a presence of dominant driveways, areas of hardstand and some duplex dwellings.

9.3.2 Built Form Elements

Style / Era

The majority of dwellings are pre-WWII villas and large bungalows, with a mix of gable and hipped gable roofs, gable ends with shingles, large bay or bow windows, and verandahs or entry porches. Timber detailing is generally picked out in contrasting (paler) colours to the weatherboard cladding. There are some contemporary infill buildings on the street and at the rear and many original houses have additions in the form of extensions, attic conversions, and attached or detached garages to the front and side of the property.

Building Scale and Form

There is a different built form character on different streets as a result of different lot sizes, setbacks and scale of houses. Generally, east of Bretts Road the houses are smaller than to the western part of the Character Area. Knowles and Chapter Streets have a predominantly two storey scale, with houses set back from the street in generous gardens that give a sense of spaciousness to the streetscape. Elsewhere there is a mix of one and two storeys. This mix means that building scale and form is subservient to the landscape and street relationship characteristics in determining the integrity of the Character Area.

Relationship to Street / Visual Connectivity

The bungalows in this Character Area have entry porches both facing the street and to the side, and large windows on the front façade. This Character Area would have originally featured houses 'sitting in the landscape' – that is, with space around as well as in front and behind them that enabled



mature planting. This has been somewhat diluted by infill and the introduction of garages and driveways. Overall the predominance of high fences, mostly solid (whether timber or other materials) has reduced visual connectivity between houses and the footpath, and limited the ability to appreciate the architecture and the gardens. Garages to the front, and driveway / hardstand areas, have also compromised the street relationship and the original garden setting.

9.4 Conclusion

Primary and intrusive buildings each make up around 14% of the area, and contributory and neutral buildings around 35% each. There are some clusters of contributory buildings towards the Papanui Road end of Mays, Chapter and Knowles Streets, on the south-west side of Chapter Street and Weston Road east of Bretts Road, and on Papanui Road between Chapter Street and Weston Road. Most of the neutral and intrusive buildings are towards the middle of the Character Area but are also scattered throughout.

9.5 Recommendation

This Character Area is not recommended for retention, having lost the consistently deep setbacks, generously landscaped front gardens and open views from the street that gave it its unique character. There are some characteristics that could be supported through design guidance, but these are not unique to this area and could be applied wherever there are large, deep sites with the potential to be subdivided for rear infill:

- Building height for new buildings at the rear to be limited to 2 storeys
- Building type multi unit dwellings, if permitted, should be limited to two attached dwellings that read
 either as separate houses or a 'big house' typology (eg. one entrance to the street, one to the side)
- Garages located / designed so as to:
 - not obscure character houses (for example orienting them to the side, limiting their width in relation to the lot frontage so as not to block clear views between the street and the front door) and
 - be recessive in relation to the front building line of new houses (for example by being set back, not dominating in terms of scale)
 - for infill buildings at the rear, not to be the only built element visible down the access driveway
- Side setbacks that allow for a soft edge to any new side driveway to minimise the area of hard paving / optimise the area for planting
- Low fencing; or medium fencing with some transparency (eg. timber picket, hedging); with high fencing limited to 50% of the lot frontage.



9.6 Site Photographs

Streetscape

Grass berms, deciduous street trees at regular intervals and well tended garden beds extending into the road at intersections and key crossing points characterise this area (apart from Papanui Road which is a vehicle-dominated, much 'harder edged' environment.



Mays Road (looking west)



Chapter Street (looking east)



Weston Road (looking north)



Weston Road (looking north-west - creek over footpath)



Bretts Road (corner treatment - looking west)



Knowles Street (looking west)



Primary Site Classification

The primary site classification relates to the period and style of architecture, built form, scale and materials, consistent street setbacks with small front gardens, and low (or open) fences that allow a strong visual connection to the street. All of these qualities together make the property 'primary'.





98 Weston Road

72 Chapter Street

Contributory Site Classification

Contributory sites are those that have undergone some modification, whether to the building, the landscape quality or the fencing, but where most of the characteristics of primary sites are still visible on the street and consistent with the original character.







45 Weston Road

Neutral Site Classification

Neutral sites neither establish nor detract from the defining character values of the Character Area.





83 Knowles Street

95 Chapter Street

Intrusive Site Classification

Intrusive sites are those that detract from the defining character of the area, due to a marked change in building scale and form, a change to setbacks and building orientation in relation to the site, relationship to the street, extent and type of landscape treatment, and materiality.



77 Chapter Street



5 Mays Road

10 Character Area 40: Hawkesbury Avenue Assessment

10.1 Area Description

Character Area 40 is located in Merivale and comprises properties that front Hawkesbury Avenue between Browns Road and Somme Street. It was identified as a Character Area because of the general consistency in scale, form, and style of the buildings (early 20th century cottages), extensive mature soft landscaping both within and at the boundaries to the properties, and a clear and strong visual relationship with the street.

Hawkesbury Avenue is a straight street that forms part of a regular, orthogonal block structure. Lots front the street and rear gardens back on to each other, creating a contiguous mid-block area able to support landscape planting, including large trees, behind the houses.



10.2 Streetscape Elements

The underlying topography is flat and Hawkesbury Street forms part of an orthogonal street network. Views are contained to the street. The street is 18m wide with footpaths and narrow grass berms both sides. The carriageway is 12m wide except at the intersection with Browns Road where it has been narrowed and contains generous planted berms and trees.

10.3 Site Character Elements

The following elements detail the key characteristics of Character Area 40, as contained within private properties. These characteristics can be broken down in to landscape and built form elements, as described below.

10.3.1 Landscape Elements

Setback from Street

Across this area the addition of large modern homes has resulted in inconsistent building setbacks – ranging from around 4 to 15 metres. Those properties containing original dwellings have setbacks that have generally remained generous and contain mature front gardens.

Boundary Treatment - Planting / Fencing

High fences are present along 70% of street boundaries and consist of varying materials including timber, render, block, hedging, and metal. The use of fences often obscures views to houses and front gardens. 40% of houses that front the street have garages located at the front of properties. This is a feature of new and housing typologies, and of a noticeable proportion of older housing with garages added later, and forms a visual barrier between the street and the dwelling.



Landscape Characteristics

The landscape characteristics of this area are fairly consistent and consist of mature exotic vegetation in both the front and rear of the property which frame or filter views to the architecture. This garden setting has been compromised in properties with newer dwellings where the house and sometimes driveways dominate the site leaving little room for vegetation.

10.3.2 Built form elements

Style / Era

Most of the dwellings were constructed between 1900 and 1920. Similar architectural elements are used extensively throughout the Character Area including hipped and hipped gable roofs, and decorated verandas doubling as entrance porches, some next to a forward bay. The original building materials in the Character Area were corrugated metal roofs, brick chimneys, timber windows and painted horizontal timber weatherboards. Colour schemes now are muted, often with architectural features including door and window frames, eaves and verandah detailing painted in lighter colours than the weatherboards.

Building Scale and Form

The predominant scale is one storey, with one early 20th century two-storey house. Recent buildings are two storeys – and with a significantly larger footprint than their neighbours – and there are additions to two older bungalows that sit up above the original roofline and alter the proportions of the houses when viewed from the street. Most early dwellings are bungalows with one forward bay, with some variations for corner bays and bow windows, and an entrance porch; there are also some double-fronted hipped roof villas with an entrance verandah across the whole front facade.

Relationship to Street / Visual Connectivity

Many of the properties have solid, high timber fences. Garages have been added to a number of early properties, located 'side on' behind the front fence, which lessens their visual impact compared to the newer properties with large garage doors facing out to the street. Some front gardens have mature planting or hedging as a partial screen, but the characteristic street relationship is defined by the fences and garages, which to a varying degree interrupt and undermine visual connectivity. Where fences and their posts and gates are designed to relate to the style of the house and enable views of more of its entry door and front windows, this enables some appreciation of the architecture that is integral to the area character. Rear infill has resulted in long driveways 'down the lot' which present as 'hard' rather than 'soft' surfaces and which service houses that have no visual connection to the street.

10.4 Conclusion

This is a very small Character Area where there have been modifications to front gardens and fences and as a result to the relationship to the street. Around 33% of properties are primary, 33% contributory, 22% neutral and 12% intrusive. In assessing this part of Hawkesbury Avenue, we considered that the period, style and quality of the building stock was significant, and the architectural integrity is largely intact. Many fences, while medium to high, are themselves designed sympathetically with the style of the house, and have driveway openings wide enough to still see the house from the street. The few properties that are intrusive are those that have been subdivided for new development.

10.5 Recommendation

There are 24 properties in this Character Area. While charming, and desirable to protect and maintain the building fabric, its suitability for retention is not clear-cut, because its small size makes it marginal in terms of its overall impact on / contribution to the wider neighbourhood character. With 68% of the properties either primary or contributory it falls well below the threshold of 80%. However, it is important to note that two of the three intrusive properties are a single development (of two houses) that front Browns Road, and three of the



neutral properties are at the rear. If were deleted from the Character Area, what remain fronting Hawksbury Avenue are a16 primary or contributory properties, 2 neutral and 1 intrusive.

It is recommended that this Character Area be retained, with the exclusion of 3 Hawkesbury Avenue and 80 Browns Road. The following qualities should be protected for the original houses:

- Setback from street in the range 6 10m
- Building scale a single storey streetscape presentation ie. no roof additions to original single storey buildings if this changes the single storey appearance – 2 storeys could be allowed at the rear, below the ridgeline
- Building and roof form double fronted (square) or single forward bay, hipped and hipped gable roofs, verandas doubling as entrance porches facing the street. Note that the footprint and roof may be more complex to the rear but should present 'simply' to the street
- Fencing low or medium fencing preferred; high fencing to no more than 50% of the front boundary and in timber
- Architectural detail corrugated metal roofs, timber windows, painted horizontal timber weatherboards, posts and fretwork to verandahs and timber / shingle decoration to end gables
- Site cover limited amount of front setback given to driveway or hard stand parking retain at least 50% of front setback for soft soil / landscape.

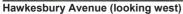


10.6 Site Photographs

Streetscape

Hawkesbury Avenue has a somewhat 'bare' streetscape with a narrow grass strip between the footpath and the front of the properties, and no street trees. The streetscape is softened to some extent by planting at the front boundary within private gardens, where this is visible above the fences. Corner buildouts at each end of the street have a street tree and feature low planting.







Hawkesbury Avenue (looking west)

Primary Site Classification

The primary site classification relates to the consistency of period and style of architecture, built form, scale and materials, extensive landscaping in the front garden and low (or open) fences that allow a strong visual connection to the street. All of these qualities together make the property 'primary'.





6 Hawkesbury Avenue

32 Hawkesbury Avenue

Contributory Site Classification

Contributory sites are those that have undergone some modification, whether to the building, the landscape quality or the fencing, but where most of the characteristics of primary sites are still visible on the street and consistent with the original character.



10 Hawkesbury Avenue



29 Hawkesbury Avenue



Neutral Site Classification

Neutral sites neither establish nor detract from the defining character values of the Character Area.



30 Hawkesbury Avenue

Intrusive Site Classification

Intrusive sites are those that detract from the defining character of the area, due to a marked change in building scale and form, a change to setbacks and building orientation in relation to the site, relationship to the street, extent and type of landscape treatment, and materiality.



83 Hawkesbury Avenue



14A Hawkesbury Avenue

11 Character Area 41: Naseby Street Assessment

11.1 Area Description

Character Area 41 lies to the north of Hagley Park and to the south of Innes Road. It covers the length of Naseby Street from Rugby Street to Merivale Lane. It was identified as a Character Area because of the large and well landscaped sites, large grass berms, and the regular distance that the houses were set back from the street. This consistent streetscape is difficult to read today, due to a combination of infill development (closer to the street), high fences and garages added in the front of older properties.

The surrounding street pattern is formal and grid-like, modified by natural features like the Avon River and its tributaries. Streets within the 'superblock' of Rugby



St, Papanui Road, Carlton Mill Road and Rossall Street are offset, contributing to a sense of containment and relative intimacy for Naseby Street, within which changes to the original character are highly visible.

11.2 Streetscape Elements

The underlying topography is predominantly flat with some properties on the eastern side of the road having up to 1m elevation. Naseby Street forms part of an orthogonal street network with views contained to the street and terminating at Rangi Ruru Girls School to the south.

Naseby Street is 20m wide and has footpaths on both sides. There is a small grass berm on the eastern side of the road which runs the full length of the street. The northern half of the street has grass berms both sides of the road. The road narrows at each end of the street and features planting and trees as well as a paved vehicle threshold at the south end.

11.3 Site Character Elements

The following elements detail the key characteristics of Character Area 41, as contained within private properties. These characteristics can be broken down in to landscape and built form elements, as described below.

11.3.1 Landscape Elements

Setback from Street

Dwellings have inconsistent setbacks from the street due to the introduction of large modern homes as well as higher density duplex housing. Front yard setbacks varied, ranging from approximately 3.5 - 15m. Properties containing original dwellings often have the larger setbacks allowing room for a front garden. Variation in setback disrupts the original pattern on the street and consistency of the streetscape, and gives more prominence to the built form due to limited provision for vegetation.



Boundary Treatment – Planting / Fencing

High fences are present along 70% of street boundaries and consist of varying materials including timber, render block, brick, hedging, and metal. The use of fences often obscures views to houses and front gardens. Hedging is a common landscape feature in this Character Area with 30% of street fronting properties featuring hedging along the boundary. 40% of houses that front the street have garages located at the front of properties. This is a typical feature of the new houses, and is more representative than not of the older houses that have introduced access and garaging for cars. It forms a visual barrier between the street and the dwelling.

Landscape Characteristics

The eastern side of the street is higher and elevates these houses. This gives greater prominence to both fencing and built form that sits close to the road boundary. Landscaping within properties varies throughout the Character Area. Properties with original houses often contain mature landscaping including side and rear canopies creating a garden setting which frames and some cases filters views of the architecture. This strong garden character has been eroded with the introduction of higher density dwellings that are maximising site coverage.

11.3.2 Built Form Elements

Style / Era

Many periods are represented in this Character Area, from early 20th century villas to contemporary homes. Early houses are one and two storeys, with corrugated metal roofs, brick chimneys, timber windows and painted horizontal timber weatherboards. Later buildings include timber and brick duplexes and townhouses from the latter part of the 20th century, and recent dwellings feature a mix of materials, primarily painted render with additional metal or timber cladding.

Building Scale and Form

Building scale and form scale is mixed, comprising one and two storeys, moderate to large dwellings, and roofs whose pitch varies from steep (some with dormers) to moderate hipped gables, to flat). Older houses have deep eaves overhang and greater decoration around openings, creating depth to the façade, in contrast to the flatter planes of newer houses. Multi-unit infill development is typically 'down the lot' which departs from the layout and orientation of traditional buildings within the Character Area. Instead, entries face side driveways; the wall facing the street reads as an 'end' rather than a 'front'. These buildings also cover more of the site, and their roofs are larger and more simple in form than earlier dwellings (this is most apparent when viewing them obliquely). By definition, this building type is uncharacteristic of the identified Character Area character.

Relationship to Street / Visual Connectivity

The properties that retain a clear and direct visual relationship to the street are those where fences are low or medium, the front garden deep, and where the topography means they are slightly raised above the street and therefore more visible. In general however this quality has been diminished both by the addition of high fences and garages in front yards and the introduction of later infill dwellings. Fences range from corrugated metal, to timber, to rendered blockwork. New dwellings have integral or attached double garages that limit the opportunity for windows that overlook the street, and whose wide driveways reduce the berm area of the streetscape.

11.4 Conclusion

Naseby Street has undergone considerable change. There are 7 primary (and 1 contributory) lots remaining, and there is a marked difference between them and more recent development, most of which has been assessed as 'intrusive' rather than 'neutral' due to bulk, scale, reduced setbacks / greater site cover, fencing and relatively little landscaping.



11.5 Recommendation

Naseby Street is not recommended to be retained as a Character Area. There are some characteristics that could be supported through design guidance and which could also be applied throughout the wider neighbourhood:

- Building height and scale 1-2 storeys, with the roof forms subservient to the main building
- Building type multi unit dwellings, if permitted, should have the front dwelling present to the street (including its front door being visible, and at least one windows in the front façade to a primary space)
- Front setbacks a minimum of 6 metres
- Garages located / designed so as to:
 - not obscure character houses (for example orienting them to the side, limiting their width in relation to the lot frontage so as not to block clear views between the street and the front door) and
 - be recessive in relation to the front building line of new houses (for example by being set back, not dominating in terms of scale)
- Side setbacks that allow for a soft edge to any new side driveways (particularly if a site is subdivided for infill at the rear) to minimise the area of hard paving / optimise the area for planting and to retain the house-space-house rhythm that is characteristic of the area. A 3.2m setback would achieve this comfortably.
- Low fencing; or medium fencing with some transparency (eg. timber picket, hedging); with high fencing limited to 50% of the lot frontage.



11.6 Site Photographs

Streetscape

Naseby Street has a somewhat 'bare' streetscape because of the extent of hard paving combined with the solid, high fences and lack of front garden planting. There is a narrow grass strip between the footpath and the front of the properties, and no street trees except in corner buildouts that also feature low planting.



Naseby Street (looking north-west)



Naseby Street (looking south-east)



Primary Site Classification

The primary site classification relates to the consistency of period and style of architecture, built form, scale and materials, extensive landscaping in the front garden and at the boundary, and low to medium fences that allow a strong visual connection to the street. All of these qualities together make the property 'primary'.





44 Naseby Street

34 Naseby Street

Contributory Site Classification

Contributory sites are those that have undergone some modification, whether to the building, the landscape quality or the fencing, but where most of the characteristics of primary sites are still visible on the street and consistent with the original character.



34 Rugby Street



Neutral Site Classification

Neutral sites neither establish nor detract from the defining character values of the Character Area.





12 Naseby Street

40 Naseby Street

Intrusive Site Classification

Intrusive sites are those that detract from the defining character of the area, due to a marked change in building scale and form, a change to setbacks and building orientation in relation to the site, relationship to the street, extent and type of landscape treatment, and materiality.



18 Naseby Street



10A Naseby Street

12 Summary Table

Table 3 below provides a summary of the key recommendations for the 9 Character Areas assessed.

#	Name	Predominant Underlying Character (Landscape / Built Form)	Elements to Retain / Protect	Recommendations
-	Heathcote Valley	Built form	 Setbacks: small to moderate front setbacks – in the range 3m to 6m Modest scale of housing Simplicity of architectural style and roof forms Clear, direct relationship between the street and the house, particularly the front door and windows to primary rooms Consolidated areas for soft landscaping, through setbacks and site cover. 	It is not recommended to retain Character Area 1. It is recommended that design guidance be provided for new development to acknowledge and respond to key elements (left).
~	Totara / Hinau / Puriri	Landscape	 Setbacks: minimum 8m 1-2 storey detached dwellings Large side setbacks. 	It is not recommended to retain Character Area 7. It is recommended that design guidance be provided for new development to acknowledge and respond to key elements (left).



#	Name	Predominant Underlying Character (Landscape / Built Form)	Elements to Retain / Protect	Recommendations
9	St James Ave	Built form	 Building height and scale: 1-2 storey detached houses Built form: orthogonal footprints with forward bays, medium-pitched hipped gable roofs (roofs or roof extensions are secondary to the main building) Building (street) setbacks: minimum 6m Garages located / designed so as to: - not obscure character houses - be recessive in relation to the front building line of new houses Side setbacks that are narrow on one side and wide on the other Low fencing; or medium fencing with some transparency. High fencing (if allowed) limited to 50% of the lot frontage Architectural detail: decorated gable ends, bay or bow windows, decorated verandahs or entry porches, and timber (horizontal) cladding on existing buildings. 	It is recommended that Character Area 16 be redefined to focus on the area south of St James Park. The proposed change in boundary is illustrated in Appendix 1.
0	Church	Landscape / built form	 The pattern of individual houses relating directly to the squar (eg. by limiting subdivision of lots edging the square) Houses on corners overlooking / addressing both streets Building setbacks relate to neighbouring buildings Building height and and scale: 1-2 storey building envelopes and roof forms that are 'unfussy' so that the church buildings and grounds continue to be the dominant elements. 	It is not recommended to retain Character Area 19. However, there is the opportunity to guide development in the immediate vicinity of the square towards the elements identified (left).
50	Rastrick / Tonbridge	Landscape / built form	 Building height and scale: 1-2 storeys at the street interface, 3 storey elements set behind. 	It is not recommended to retain Character Area 20.



#	Name	Predominant Underlying Character (Landscape / Built Form)	Elements to Retain / Protect	Recommendations
38	Clissold Street	Landscape / streetscape relationship	 Building height and scale:1-2 storeys, with the roof forms subservient to the main building Building type: multi unit dwellings to have the front dwelling address the street Front (building) setbacks: in the range 6 – 10m Garages located / designed so as to: not obscure character houses be recessive in relation to the front building line of new houses Side setbacks: minimum 3.2m to one side Low fencing; or medium fencing with some transparency. High fencing (if allowed) limited to 50% of the lot frontage. 	It is not recommended to retain Character Area 38. The characteristics that could be supported through design guidance, and could be applied throughout the wider neighbourhood, are identified (left).
08	Mays / Chapter / Weston / Knowles	Landscape / streetscape relationship	 Building height: new buildings at the rear to be limited to 2 storeys Building type: multi unit types limited to two dwellings, either attached dwellings that read either as separate houses or a 'big house' typology (eg. one entrance to the street, one to the side) Garages located / designed so as to: not obscure character houses be recessive in relation to the front building line of new houses for infill buildings at the rear, not to be the only built element visible down the access driveway Side setbacks: minimum 3.2m to one side Low fencing; or medium fencing with some transparency. High fencing (if allowed) limited to 50% of the lot frontage 	It is not recommended to retain Character Area 39. The characteristics that could be supported through design guidance, and could be applied throughout the wider neighbourhood, are identified (left).



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#	Name	Predominant Underlying Character (Landscape / Built Form)	Elements to Retain / Protect	Recommendations
40	Hawkesbury	Built form	 Setback from street: in the range 6 – 10m Site cover: retain at least 50% of front setback for soft soil / landscape (ie. not garage or hard stand parking areas). Building scale: max 1 storey at the street interface, 2 storeys permissable at the rear, below the ridgeline Building and roof form: double fronted (square) or single forward bay, hipped and hipped gable roofs, verandas doubling as entrance porches facing the street. Note that the footprint and roof may be more complex to the rear but should present 'simply' to the street. Low fencing; or medium fencing with some transparency. High fencing (if allowed) to be timber and limited to 50% of the lot frontage Architectural detail: corrugated metal roofs, timber windows, painted horizontal timber weatherboards, posts and fretwork to verandahs and timber / shingle decoration to end gables. 	It is recommended to retain Character Area 40 with the exclusion of two intrusive properties on the corner of Hawkesbury Avenue and Browns Road.
14	Naseby	Landscape / streetscape relationship	 Building height and scale:1-2 storeys, with the roof forms subservient to the main building Building type: multi unit dwellings to have the front dwelling address the street Front (building) setbacks: minimum 6m Garages located / designed so as to: not obscure character houses be recessive in relation to the front building line of new houses Side setbacks: minimum 3.2m to one side Low fencing; or medium fencing with some transparency. High fencing (if allowed) limited to 50% of the lot frontage. 	It is not recommended to retain Character Area 41. The characteristics that could be supported through design guidance, and could be applied throughout the wider neighbourhood, are identified (left).



MEMORANDUM OF LANDSCAPE OBSERVATIONS & INITIAL RECOMMENDATIONS

Christchurch District Plan, Plan Change 14

For the areas within the Riccarton Bush - Kilmarnock Residents' Association zone.

ISSUE: TO ACCOMPANY SUBMISSION ON PC14

Date: 1 May 2023

Prepared by:

Kamo Marsh Landscape Architects Ltd P. O. Box 2833 Christchurch

Tel: (03) 366-8181



MEMORANDUM OF LANDSCAPE OBSERVATIONS & INITIAL **RECOMMENDATIONS**

Project no: 5381

Revision: A

Date: 1 May 2023

Author: Bridget Robilliard - Registered Landscape Architect (NZILA) Reviewed by: Jade Au Morris - Registered Landscape Architect (NZILA)

Contents

1.	Introduction	4
	Methodology	
ა.	Landscape Observations and initial recommendations	ວ

Notes:

- o Images captured on Fuji film X-T10 camera with XF 50mm zoom lens.
- o Date: 27th April 2023 between 2.33pm and 4.27pm.
- o Height of 1.65m.
- o Each view includes several photos merged together to create a panorama view, to provide 124 degree viewing angle to meet NZILA best practise guidelines
- Photo sizes are adjusted to suit document layout, original images can be provided if required.

1. INTRODUCTION

- 1.1 This memorandum of landscape observations and initial recommendations has been prepared to form part of the submission on the proposed Christchurch District Plan, Plan Change 14 by the Riccarton Bush Kilmarnock Residents' Association.
- 1.2 The areas which were assessed for the preparation of this memorandum were areas that sit within the Riccarton Bush Kilmarnock Residents Association's boundary, with focus on key areas within the zone which have been identified by the Residents' Association, with the advice from Christchurch City Council staff, as requiring the professional advice of a landscape architect.
- 1.3 It is intended that this memorandum forms part of the submission and that further investigation and a formal landscape assessment shall be carried out following the submission if required.

2. METHODOLOGY

- 2.1 Relevant sections of the proposed Plan Change 14 have been reviewed prior to preparation of this memorandum, with particular focus on:
 - Section 32 evaluation item 6.11 Building heights adjoining Riccarton Bush,
 - Appendix 43 P

 utaringamotu Riccarton Bush Heritage Landscape Review.
- 2.2 The site visit and preparation of this memorandum has been undertaken by Bridget Robilliard (Registered NZILA Landscape Architect) from KM. The memorandum has been reviewed by Jade Au Morris, a Registered NZILA Landscape Architect from KM.

3. LANDSCAPE OBSERVATIONS & INITIAL RECOMMENDATIONS

The following sections relate to key areas within the Riccarton Bush-Kilmarnock Residents' Association zone in which landscape architecture advice was requested. These sections include initial observations of potential impacts of the proposed Plan Change 14 on the landscape character and features. Preliminary recommendations have been included where deemed to be appropriate.

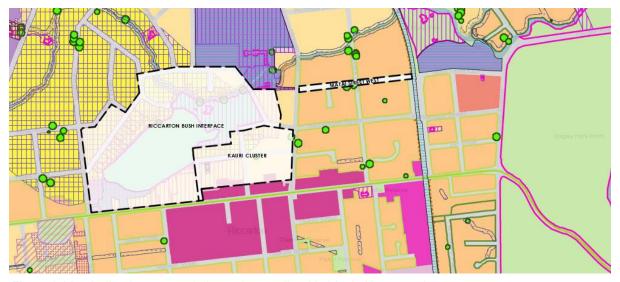


Figure 1. Map indicating areas of discussion, outlined in black. Not to scale.

A. RICCARTON BUSH INTERFACE AREA

- I. <u>Location:</u> The extent of the Riccarton Bush Interface area_was assessed during the site visit. The zone considered to have visual impact for both outward looking views from Riccarton Bush and House grounds and inward looking views from the surrounding areas was reviewed.
 - <u>Discussion:</u> It was found that the zone noted to be considered as the Riccarton Bush interface area in appendix 43, and incorporated into the proposed plans, aligned with our assessment with the exemption three lots which we believe should also be included within the zone. During our site visit it was found that 34, 36 and 36A Kahu Road also held a strong visual impact to both outward views from the Riccarton House Grounds and inward views from the public road. The location of two of these sections adjacent to the Ōtākaro/ Avon River would also suggest that development would have a greater visual impact as a contrast to a natural landscape feature. Note: The observation of Riccarton Bush and Riccarton House grounds being intrinsically tied as noted in Appendix 43 was also adopted during this preliminary assessment.

<u>Recommendation:</u> We recommend that 34, 36 and 36A Kahu Road be included within The Riccarton Bush Interface Area.



Figure 2. View from the north-eastern area of Riccarton House grounds looking north towards 34 and 36A Kahu Road across the Ōtākaro/ Avon River.



Figure 3. View from the Kahu Road bridge over the Ōtākaro/ Avon River looking south west with the Riccarton House Grounds on the left and 34 Kahu road on the right.

II. <u>Location:</u> The potential visual impacts of properties which face the Riccarton House Grounds was considered during the site visit. This was in regard to 9 to 35 Kahu Road, and 6 to 10 Kahu Road, which are included in the Riccarton Bush Interface Area.

<u>Discussion:</u> This initial assessment also took into consideration visualisations included in Appendix 43 in relation to these frontages. The outward looking views of this area from the Riccarton House Grounds has the potential to have a high adverse visual impact of the visual character of the main entrance into Riccarton House Grounds and from the southern area of the grounds. It was also considered appropriate that the physical connection with this area to the historic Deans Farm buildings, as noted in Appendix 43, be taken into consideration in regard to landscape character as a space linking the historic Dean's Family buildings.

Recommendation: That further visual simulations be developed which explore potential benefits to visual amenity and landscape character of an increased set back (greater than the proposed 1.5m) from the road boundary. Should these visualisations indicate a reduced visual impact, it is recommended that the inclusion of a greater road set back to properties within the Riccarton Bush Interface area which face the Riccarton Bush and House grounds be incorporated into Section 14.



Figure 4.Looking east towards Kahu Road from the main entrance into the Riccarton House Grounds.

III. Location: Sections physically adjoining Riccarton Bush and House Grounds were assessed for both outward and inward views, while other potential implications such as the health and maintenance of The Bush were also considered. Discussion: Generally, site observations agreed with those noted in Appendix 43 and aligned with the extent of the zoning proposed in Plan Change 14. It is considered that there is potential for high adverse visual impact by development to sections directly to the south of Riccarton Bush and Riccarton House Grounds as there is a degree of visibility from the southern section of Te Ara Karariki trail. Current visual impact is limited by the position of built structure, materiality and colour and planting of these dwellings. It is suggested that further considerations of impacts and additional requirements be implemented if deemed necessary. The protection of vegetation along this boundary is also of great importance to the visual amenity for both inward and outward views as well as of historical value. This area was where the historically Pūtaringamotu extended past the current size, prior to harvesting and full removal by The Canterbury Association. Much conservation effort has been made by both the Dean's family, and later by The Riccarton Bush Trust, to ensure this boundary provide suitable protection for the larger Bush area. The health and maintenance of the bush along all boundaries is of high importance to retain the biodiversity, visual amenity and landscape character of the site and neighbouring boundaries. The development of properties adjoining Pūtaringamotu/ Riccarton Bush also have the potential to have implications of the management of The Bush, it is considered appropriate that aspects which will minimize risk of damage to The Bush, by elements such as predator intrusion and fire, from development to neighbouring properties be integrated into Plan Change 14.

Recommendations:

- That further visual simulations are developed to assess the potential impact of building positions, material and colours to properties directly adjoining the southern area of Riccarton Bush and House. Should potential for adverse effects be found then recommendations from these assessments should be included within Plan Change 14.
- An arborist and ecologist are engaged to assess potential impact of the health of Pūtaringamotu/ Riccarton Bush by possible development directly around the edge of Riccarton Bush, and any recommendations and integrated into Plan Change 14.

That the Riccarton Bush Trust be consulted regarding considerations for impacts on the management of Riccarton Bush from neighbouring development.

B. KAURI CLUSTER

I. Location: The Kauri Cluster refers to Kauri Street, Rata Street and Rimu Street, bounded by Riccarton Road to the South and Straven Road to the East. Discussion: Landscape improvements were carried out in 2008/2009 by Christchurch City Council and included the planting of native street trees which have now reached an intermediate size and appear to be in good health. The current landscape character of the area is in keeping with the proximity of Riccarton Bush and House. It is considered possible that the permitted development so close to the road boundary may have detrimental impacts to established vegetation through changes to microclimates of shading and wind and disturbance or root runs. The establishment of a number of specimen trees in close proximity to Riccarton Bush and House may be and/or may have potential to provide ecological benefits, which if found to be of value should be maintained.

Recommendations:

- That an ecologist be engaged to assess the ecological value of the protection of the existing native vegetation within the Road Reserve.
- That an arborist be engaged to assess the potential impacts of the proposed permitted development of the established vegetation and recommendations for protection of the vegetation be considered and incorporated into Plan Change 14.

C. MATAI STREET WEST

I. Location: A Cycle path is located to the northern side of Matai Street West. This is a proposed High Density Residential Zone, with permitted heights up to 14m. The bike lane connects from The University of Canterbury to the CBD. This section of the bike trail and the footpath to the northern side of Matai Street West appear to be heavily used by Christchurch Girls High School and Christchurch Boys High School student, with the schools located at either end of the road.

Discussion: It is considered that the proposed height of 14 meters and 1.5m set back distance from the road frontage that would be permitted in this area may have safety implications due to shading to the cycle and footpath during the

winter months. This could increase the frost and ice present on the path, and how long the ice/frost lasts during the day. During the site visit it was observed that some shading already occurs from a limited number of properties during the afternoon in April.

<u>Recommendation:</u> That shading diagrams be developed and a traffic safety assessment be carried out for consideration of safety impacts. Should potential for safety issues be found it is recommended that height and or set back allowance to northern properties are reviewed.



Figure 5. The western end of Matai Street West looking East.

II. <u>Location:</u> Specimen trees planted between the cycle path and carriage way to the north and between the carriage way and the footpath to the south of the road are of an intermediate size and appear to be in good health. The establishment and protection of specimen trees along this road is considered to be of particular value as this road physically and visually links the historic sites of Mona Vale and Riccarton Bush and House.

<u>Discussion:</u> It is considered that the shade and proximity of possible development to the road reserve boundary (1.5m) may have detrimental effects to the established vegetation.

Recommendation: That an arborist is engaged to assess possible impacts on existing vegetation from the proposed development. Should it be found that there are risks to the health of the existing vegetation it is recommended that this be considered and incorporated into Plan Change 14.



17. Citywide Surface Water Flooding Update

Reference / Te Tohutoro: 22/1725261

Report of / Te Pou Kevin McDonnell, Team Leader Asset Planning Stormwater and

Matua: Waterways (kevin.mcdonnell@ccc.govt.nz)

General Manager / Mary Richardson, General Manager Citizens & Community

Pouwhakarae: (Mary.Richardson@ccc.govt.nz)

1. Nature of Decision or Issue and Report Origin

- 1.1 Christchurch is a low lying, coastal city where past development practices have left a legacy of flood risk. The flat nature of the city makes it challenging to provide an effective stormwater network. Over the decades stormwater ponding and flooding issues have been prevalent across many parts of the city. Many of these were made worse by the earthquakes.
- 1.2 Council has invested heavily in stormwater and floodplain management infrastructure since the earthquakes. Considerable work has been done as part of the Land Drainage Recovery Programme (LDRP) and in response to the 2014 Mayoral Flood Taskforce. Council has invested nearly \$300 million in reducing flood risk since 2010. The target for the LDRP projects was to restore pre-earthquake levels of flood risk. The pre-quake level of flood risk may no longer be considered acceptable. However, the system performed comparatively well to post-earthquake, as evidenced by the absence of above floor flooding in the July 23 rainfall event.
- 1.3 The lack of flooded homes in the Flockton Street area and along the Heathcote River in recent years highlights the benefits achieved by Council's recent investment. But there are still areas across the city where surface water ponding presents a challenge to the community. Occasionally, community complaints have resulted in unprogrammed work to help understand or alleviate surface water issues. These decisions are typically made in absence of a district wide view of surface water. This report intends to present a wider view on stormwater management that will enable more informed decisions to be made on local issues.
- 1.4 Council has many methods for managing the different components of flood risk, from development controls in extreme risk and ponding areas, floor level and building platform level setting for high risk areas, through to building stormwater network for frequent storms. This approach seeks to minimise damage but still allows for stormwater to be in our streets and on properties in common events. It is not possible to resolve all aspects of flood risk particularly in older areas, however, Council addresses many components of the risk profile through controls on new development. In some areas flood risk is considered practicable to address through new stormwater management projects.
- 1.5 Funding exists in the current Long Term Plan (LTP) to address issues in some areas prone to ponding and at risk of flooding, mainly in the later years of the LTP period. Funding is also been included within the draft Annual Plan to progress stormwater modelling across the city. This work will be a key input to identifying priority areas and developing mitigation options. Any proposed projects will then be supported by an improved understanding of existing flood risk.
- 1.6 Prioritisation of potential floodplain management projects needs to be undertaken. More work will be required to develop and prioritise options to address present day and future surface water ponding and flood management issues across the city and district. This work is part of business as usual work to plan the Stormwater Drainage and Flood Protection and



Control Works Activities. However, the scale of the task relative to resourcing available limits Council's ability to address all areas at pace and significant time will be required to complete the prioritisation work.

- 1.7 Provision of immediate significant additional funding to fast track design and delivery of flood mitigation physical works is not recommended as insufficient information is available to reliably prioritise the individual projects. The prioritisation of projects is best considered as part of the LTP, where financial requirements can be well understood and Councils strategic priorities and community objectives can be balanced. Alternatively, this information will useful to an incoming water entity to help inform their work programme. Either way, the community will be better prepared for the future.
- 1.8 This report was requested by Council via resolution CNCL/2022/00116. The resolution was to "request staff to prepare a report on surface flooding across urban Christchurch and recommend potential stormwater projects for consideration in the annual plan."
- 1.9 The decisions in this report are of medium significance in relation to the Christchurch City Council's Significance and Engagement Policy. The level of significance was determined by the broad impacts of stormwater ponding and flooding across the district. Severe flooding only impacts a small number of property owners, however, the impacts and community interest are such that a medium significance is justified.

2. Officer Recommendations Ngā Tūtohu

That the Council:

- 1. Consider stormwater management infrastructure through the standard Annual Plan and Long Term Plan processes.
- 2. Continue to investigate stormwater network and river flooding across the city to increase certainty in floodplain management options and develop a prioritised list of works, with these works to initially be drawn from existing projects and programmes within the current LTP.

3. Reason for Report Recommendations Ngā Take mō te Whakatau

- 3.1 The existing processes for development and approval of Annual Plans and Long Term Plans (LTP) provides sufficient flexibility to address priority stormwater infrastructure requirements. Past risk assessments have informed the current LTP and earlier LTPs have supported significant infrastructure investment. This can be seen in areas across the city, from the Flockton Street Area and Cranford Basin to the Upper Opawaho Heathcote River and Heathcote Valley. Many areas of the most severe flood risk have already benefited from Council work but more work needs to be done.
- 3.2 Existing programmes to investigate and reduce flood risk across the city are underway. These will work towards reducing flood risk in some of our most vulnerable areas, however, this will not address flooding and surface water ponding in all areas. Further investigations will be needed to respond to develop a comprehensive list of options to address surface water ponding and floodplain management issues.
- 3.3 Utilising the existing processes is recommended as this will enable projects to be effectively weighed and prioritised within the wider context of Council's objectives and desired outcomes.



4. Detail Te Whakamahuki

- 4.1 Rainfall and flooding is highly variable both in time and across the district. It is not possible to 'fix flooding' and some level of flood risk would be present even if investment were significantly increased. There will always be a bigger flood event, or areas that cannot be practicably remedied. As described in the 8 September 2022 report that preceded this report:
- 4.2 Managing flooding is challenging in Christchurch as it is flat and low lying. Pipes, drains and waterways only have limited capacity so the city also relies on overland flow paths and flood ponding to deal with extreme events. We design our networks to direct stormwater and flooding towards parks and roads ahead of properties and homes. However, past practices have left a legacy of risk in some locations and there are still some very low lying buildings at high flood risk...
- 4.3 Council has a variety of tools, processes and plans for managing flood risk. One of the key tools is setting floor levels through the District Plan and Building Act controls. Recently district plan controls were extended to commercial buildings. As redevelopment occurs over time, new buildings will be built with higher floor levels and at reduced flood risk. This means flood risk will reduce at little to no direct cost to the wider community. Some costs and inconveniences associated with flooding will remain, for example inability to access properties could stop business from trading or stop people from getting to work.
- 4.4 Through our design principles we integrate land use planning and infrastructure investment to direct stormwater into areas where it is likely to cause the least damage. The intention is to have stormwater on roads and in parks before properties and houses. There is a layered and integrated approach taken to managing flood risk across the city. It is not practicable to engineer our way out of all levels of risk. Council seeks to limit new development in the highest risk areas through district plan zoning. The high flood hazard management areas and flood ponding areas set a very high threshold for new development. The next level of control is the setting of building platform levels and floor levels though building consents and district plan zoning. Engineering of overland flow paths and stormwater networks is typically reserved for managing frequent storm events (Table 1).

Table 1 Simplified Summary of Council's Typical Stormwater Management Approach

Size event	<5 yr event	5-10 yr	10-50 yr	50-200 yr	200-500 yr	>500 yr
Approach	Pipe network	Overland flow and ponding in street	On street and property but below building platforms	Control of floor levels in flood management areas	Development controls in high flood areas	No controls – accept risk

4.5 In order to inform the above approach we develop models to help us understand present day and future flood risk. These models highlight that flood risk is highly variable across the city and can be affected by very localised features, such as road crest heights, sump inlet locations, waterway shape and historic public and private structures. Flood risk can also be driven by much broader factors, such as, catchment rainfall, sea level rise, permeability of soils and development intensity. Considerable effort is required to understand and evaluate flood risk at any given location. The models can then be used to test future climate change scenarios with and without infrastructure upgrades. This is fundamental to developing robust project prioritisation but takes time to complete.



- 4.6 Much work has already been done on investigation and delivery of floodplain management works using past models. There are many areas across the city where frequent ponding of surface water in streets and properties is reported to Council or is predicted by flood modelling. Past assessments have identified areas of modelled and reported ponding, including (by catchment from north to south):
 - 4.6.1 *Puharakenui / Styx River Catchment*: Earlham Street, low lying areas adjoining the river, Lower Styx Road and Kaianga Road
 - 4.6.2 Ōtākaro / Avon River Catchment: Mairehau Road about Kirlaw Place, the Flockton Street area, Emmett Street area, Edgeware Village, Edgeware Road about Champion Street, Brenchley Avenue, Wayside Avenue, Upper Dudley Creek about Bishopdale Park, New Brighton Road, Burwood Road, Bassett Street, Dudley Creek about Blighs Road, Bradshaw Terrace, Avondale, Jeffreys Road, Strowan Road, Newport Street and Tenby Place, Sabina and Golf Links Road area, Landy Place, Coopers Road, Pages Road, Tovey Street and Union Road, Rowes Road, parts of the Brittans drain catchment in Linwood, Owles Terrace, McBratneys Road at Gayhurst Road and Kyle Street
 - 4.6.3 Opawaho / Heathcote River Catchment: sections along the Opawaho Heathcote River, areas between Buchanans Road and Paparua Stream, Duke Street, Hendersons Road and Sparks Road, Wilderness Drain, Middlepark Road, Greenhurst Street, Marshwood Place, Vickerys Road, Marion Street, Gainsborough Street, Sparks Road, Weir Place, Greenpark Street, Remuera Avenue, Pope's Stream beside Centaurus Road and Hillsborough Terrace, Curries Road, Bradbourne Street, Opawa Road, Hamlet Lane, Pawaho Place and Stedley Place
 - 4.6.4 Ihutai / Avon-Heathcote Estuary and Coastal Areas: Rockinghorse Road, Caspian Street, parts of the City outfall drain catchment in Linwood, Cygnet Street, Marine Parade, Main Road, Augusta Street and adjoining streets, Beatty Street, Monks Bay roads, McCormacks Bay Road, and Maces Road
- 4.7 The above is not an exhaustive list. There have been complaints received across much of the city. These typically relate to cleaning and clearing blocked sumps / inlets, however, some indicate broader surface water management issues.
- 4.8 The presence of surface water on properties and streets does not always meet community expectations. The scale of work required to address property flooding in all the areas listed above is not likely to be practicable, from many perspectives, including cost. Council and the community may have to accept that some surface water ponding and private property flooding cannot be addressed through physical work, particularly as the climate changes. Utilising planning and regulatory tools is a fundamental part of Council's overall strategy for managing flood risk, now and into the future.
- 4.9 Responding to flooding on an ad hoc basis can lead to inconsistent decision making and inefficient delivery. This could be perceived as being contrary to a desire for responsiveness and agility in decision making. The challenge is to make decisions at the local level but within the context of similar issues across the city. The existing planning framework allows for identification and prioritisation of projects of different nature and location. This gives the most robust outcome, if the input data is also sufficiently robust.
- 4.10 The preparation of an LTP enables the balancing of meeting objectives against cost so that projects can be prioritised within a wider programme. The focus of the current Stormwater Drainage and Flood Protection and Control Works Activity Plans as defined in the current LTP is broadly on completion of the Upper Heathcote works, delivery of work in the Ōtākaro Avon River Corridor, supporting growth and realising opportunities for flood risk reduction in existing urban areas through growth projects.



- 4.11 Funding for improving stormwater modelling this has been proposed within the draft Annual Plan. This will fund implementation of new, improved stormwater models to specific areas of focus within the city. The investigations proposed in this report will apply new modelling and knowledge gained from storm events in recent years to increase certainty and update the priority areas for flood mitigation, with actions initially drawn from within the current LTP through applying the standard capital programme management processes, including change requests.
- 4.12 There are also a number of projects in the current LTP to address localised areas of flood risk. These projects are listed in the LTP 2021-2031. The proposed project budgets total approximately \$14 million and will deliver a number of smaller works across the city, in: McCormacks Bay, Bishopdale, Riccarton, Heathcote Valley, Hoon Hay, Hillsborough, Shirley, Cashmere and Redcliffs. The \$14 million figure does not include budgets for the larger flood management schemes (e.g. OARC or Upper Heathcote Storage) or to provide for growth.
- 4.13 The three waters reform programme is currently underway. There is some uncertainty how this could alter prioritisation of work in future years. At present, we are working within existing frameworks and this report has been framed as such. Independent of reform outcomes, the work on prioritisation will be useful to either the water entity or Council.
- 4.14 The decision affects the entire district due to the potential rates impact and that there are stormwater and flood management concerns in many parts of the city. There have been many complaints about flooding and issues raised in many areas from various stakeholders, including: residents, business owners, residents associations and community boards. Much of this feedback has called for Council to act to reduce surface water ponding and flooding. However, this feedback may not be representative of the broader community views and preferences. Engagement on the Annual Plan will be an opportunity to further understand the views and preferences of the community.

5. Alternative Options Considered Etahi atu Kowhiringa

- 5.1 An alternative is to initiate projects to address the areas of concern immediately. This would involve allocating budget for:
 - 5.1.1 New capital projects, followed by design, consenting and construction
 - 5.1.2 Increasing the maintenance budgets and applying more effort to keep the network clean and clear.
- 5.2 Past investigations have been undertaken as part of the Land Drainage Recovery Programme, Mayoral Flood Taskforce and standard planning processes. These investigations developed options to address flooding but not all options were: cost effective, successful in securing funding through the Council's planning processes or were decided against / deferred by past Council decisions. For example, options were investigated but not initiated in the following areas:
 - 5.2.1 Edgeware Village: a new pump station and stormwater network extension
 - 5.2.2 Emmett Street: new pipe work to drain water away from low lying properties
 - 5.2.3 Flockton Street area: a new pump station to over-pump the Flockton invert pipework into Dudley Creek to extend the benefits of the Dudley Creek Flood Remediation work
 - 5.2.4 Francis Avenue: new pipe network to duplicate the Flockton invert
 - 5.2.5 Bromley Park: a storage basin in Bromley Park and a pump station to reduce flood risk in adjoining areas



- 5.2.6 Brittans Drain and City Outfall Drain catchments: a large number of options were investigated to reduce flood risk in Linwood and Bromley including pumps, pipes and storage
- 5.2.7 Estuary Drain: a new pump station draining the Rowses Road area
- 5.2.8 Central City: stopbanks, floodwalls, river bank work and associated road work
- 5.3 A basic summary of these and other options is provided in Attachment A. The summary excludes options that are currently funded in the LTP and are supported by the draft Annual Plan.
- 5.4 The advantage of doing any or all of the above projects would be to reduce flood risk. However, such action may not be consistent with the prioritisation which would result from taking a city-wide view, and may not provide an efficient delivery platform. Also, if progressed, most of the above projects will require additional funding and will cause disruption. Some projects may require land acquisition. Further investigations will be required to develop the individual options and build more certainty in risks, costs, benefits and impacts. The possibility of uncovering contaminated land and achieving consents to undertake the work will be key risks if the projects were to progress.
- 5.5 As such, the estimates provided in Attachment A should be treated as indicative only and not used for budgetary purposes. Consideration of funding these projects could be achieved through standard processes. The cost estimates for the preferred projects would need to be revisited prior to approval.
- 5.6 With any flood management approach there will be residual risk of flooding. Even if immediate work were to be undertaken there would still be residual risk of flooding in events larger than that of the design capacity of the system.

6. Policy Framework Implications Ngā Hīraunga ā- Kaupapa here

Strategic Alignment Te Rautaki Tīaroaro

- 6.1 The proposed approach is aligned with Council's current strategic priorities to *meet the* challenge of climate change through every means available and ensuring rates are affordable and sustainable. These priorities are subject to change with the new term of Council.
- 6.2 This report supports the <u>Council's Long Term Plan (2021 2031)</u>:
 - 6.2.1 Activity: Flood Protection and Control Works
 - Level of Service: 14.1.6.1 Manage the risk of flooding to property and dwellings during extreme rain events: Annual reduction in the modelled number of properties predicted to be at risk of habitable floor level flooding of the primary dwelling in a 2% AEP Design Rainfall Event of duration 2 hours or greater excluding flooding that arises solely from private drainage - >=0 properties per annum on a rolling threeyear average

Policy Consistency Te Whai Kaupapa here

- 6.3 The proposed approach to develop a prioritised list of projects through Council's standard processes is consistent with Council's Plans and Policies:
 - 6.3.1 Te Wai Ora o Tāne Integrated Water Strategy: Objective 6 of the strategy is to "Understand the likely extent and effects of flooding, and the risk posed by flooding." Objective 7 is to "Manage and adapt to the effects of flooding using natural systems, planning tools, community adaptation and infrastructure solutions." The proposed approach will help deliver against these objectives.



- 6.3.2 Obligations under the Comprehensive Stormwater Network Discharge Consent: Condition 25 requires Council to "provide retrofit water quality and quantity mitigation for existing development where practicable." Developing a prioritised list of practicable work helps to meet Council's obligations under the consent.
- 6.4 Obligations under the Local Government Act 2002: see discussion in Section 8 below.

Impact on Mana Whenua Ngā Whai Take Mana Whenua

- 6.5 The decision does not involve a significant decision in relation to ancestral land or a body of water or other elements of intrinsic value, therefore this decision does not specifically impact Mana Whenua, their culture and traditions. However, any options that are implemented are likely to, and Mana Whenua will be engaged with in the formation phases of resulting projects.
- 6.6 The decision involves a matter of interest to Mana Whenua and could impact on our agreed partnership priorities with Ngā Papatipu Rūnanga as the nature of the investigations could result in impacts on Te Mana o Te Wai.
- 6.7 The prioritised programme of work resulting from the proposed investigations could have cultural impacts. These will need to be explored as part of scoping the individual projects. Consents to undertake physical works are likely to be required with associated statutory obligations for consultation with Mana Whenua.

Climate Change Impact Considerations Ngā Whai Whakaaro mā te Āhuarangi

6.8 The development of a prioritised programme proposed in this report will have very limited climate change impacts as the work will be mainly desktop based. However, there will be climate change impacts for any works proposed to be prioritised within the resulting programme of work. These impacts will need to be considered at the time of approving the projects within the proposed programme.

Accessibility Considerations Ngā Whai Whakaaro mā te Hunga Hauā

6.9 The proposed approach does not have any accessibility considerations.

7. Resource Implications Ngā Hīraunga Rauemi

Capex/Opex Ngā Utu Whakahaere

- 7.1 Cost to Implement the cost to undertake the proposed investigations required to develop a prioritised programme will be delivered utilising existing resources over a number of years. Given the nature of the work the total cost is highly uncertain and has not been estimated. Acceleration in the work could be achieved if additional funding were granted.
- 7.2 Maintenance/Ongoing costs There will be no ongoing costs associated with the proposed approach. Any ongoing costs associated with delivery of works within the developed prioritised programme would need to be agreed with Council at that time.
- 7.3 Funding Source Existing operational planning budgets.

Other He mea ano

7.4 The cost estimate to undertake the investigations is highly uncertain and further funding may be required to support development of the prioritised physical works programme. This can be addressed through standard Council processes, such as, future Annual Plans and Long Term Plans.

City Council

8. Legal Implications Ngā Hīraunga ā-Ture

Statutory power to undertake proposals in the report Te Manatū Whakahaere Kaupapa

- 8.1 The proposed approach to develop a prioritised programme of surface water ponding and floodplain management work is consistent with the principles of the Local Government Act 2002 to give effect to it identified priorities and desired outcomes in an efficient and effective manner (section 14(1)(a)(ii)) and that a local authority should ensure prudent stewardship and the efficient and effective use of its resources in the interests of its district or region, including by planning effectively for the future management of its assets (section 14(1)(g)).
- 8.2 Council has powers under the Local Government Act 2002 to plan for and deliver services, including stormwater drainage.

Other Legal Implications Etahi atu Hīraunga-ā-Ture

8.3 The legal consideration is that reform is currently underway of the Local Government Act 2002 and the Resource Management Act 1991. This could give rise to changes in the way that stormwater and flood protection activities are delivered. Uncertainty remains as to the role that local authorities will have in the provision of these services.

9. Risk Management Implications Ngā Hīraunga Tūraru

9.1 Any flood risk intervention will have some residual risk. The proposed programme of work will not resolve flooding in all areas; for all time. From past experience it is clear that it will not be possible to identify viable engineering options for all areas. This is particularly true in areas with isolated pockets of flooding that are distant from major waterways or the coast. As the programme may not address surface water ponding and flood management in all areas there may be some dissatisfaction within sectors of the community.

Attachments Ngā Tāpirihanga

No.	Title	Reference	Page
A J	Surface Water Flooding Past Options Summary	23/205181	188

In addition to the attached documents, the following background information is available:

Document Name – Location / File Link
Not applicable

Confirmation of Statutory Compliance Te Whakatūturutanga ā-Ture

Compliance with Statutory Decision-making Requirements (ss 76 - 81 Local Government Act 2002). (a) This report contains:

- (i) sufficient information about all reasonably practicable options identified and assessed in terms of their advantages and disadvantages; and
- (ii) adequate consideration of the views and preferences of affected and interested persons bearing in mind any proposed or previous community engagement.
- (b) The information reflects the level of significance of the matters covered by the report, as determined in accordance with the Council's significance and engagement policy.



Signatories Ngā Kaiwaitohu

Authors	Tom Parsons - Surface Water Engineer
	Kevin McDonnell - Team Leader Asset Planning
	Ron Lemm - Manager Legal Service Delivery, Regulatory & Litigation
	Tim Drennan - Manager Service Excellence
Approved By	Gavin Hutchison - Manager Planning & Delivery
	Brent Smith - Acting Head of Three Waters
	Tony Richardson - Finance Business Partner
	Mary Richardson - General Manager Citizens & Community



Attachment A - Summary of past options for reducing flood risk that are not funded in the current Long term Plan (LTP)

This table provides a brief summary of options that have been investigated across the city to address localised stormwater ponding and flooding that are not currently funded. This list is not exhaustive or in any particular order. Council has been investigating potential stormwater mitigations since amalgamation with the drainage board. The list below is a snapshot of recent significant investigations and does not include historical studies.

There are many more areas where there is risk of stormwater ponding and flooding, as described in the main report, where further investigation and options development may be justified.

There are risks common to all options including: events exceeding design capacity, blockage, unknown ground conditions, contaminated land, service clashes / unknown services, archaeological or culturally significant site discovery, cost escalation, cost estimation inaccuracy and consenting. The cost estimates are generally construction cost only and should not be used as project budgets. The estimates do not include operational costs and are not whole of life costs.

Even with works implemented there will still be flooding of streets and properties as engineering interventions cannot practicably resolve all flooding. A future earthquake could degrade the benefits of these options and climate change impacts will reduce the benefits with time.

	Suburb / street / area	Waterway / catchment	Option description	CAPEX estimate (year estimated)	Benefits	Risks	Issues (incl. past decisions)	Design stage
1	Edgeware Village	St Albans Creek	New pump station and stormwater network extension	\$21 million (2018)	Approx. 8 houses + 8 business + property flooding reduction	Pump operation	Construction impacts (Bealey Avenue) Discharge to Ötākaro Avon Council decision to update costs before LTP (CNCL/2022/00116)	Concept design Potential to extend work and benefit but at a cost

1

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	Suburb / street / area	Waterway / catchment	Option description	CAPEX estimate (year estimated)	Benefits	Risks	Issues (incl. past decisions)	Design stage
2	Emmett Street	Shirley Stream	New pipe work to drain water from Jebson, Emmett, Orontes area to Shirley Stream and up to Lower Dudley Bypass from Briggs Road	\$0.4 million (2017)	Reduced duration and extent of ponding on Emmett Street properties	Private property impacts for works	Only provides benefit if Shirley Stream is low	Concept design
3	Flockton Street area	Flockton Invert (Dudley Creek)	New pump station to over-pump the Flockton invert pipework into Dudley Creek to extend the benefits of the Dudley Creek Flood Remediation work	\$3.8 million (2017)	Reduced duration and extent of ponding in Flockton Street area Replace need for temporary pumping H&S benefits	Pump failure	Limited benefits due to past application of flood intervention policy	Options assessment
4	Francis Avenue	Flockton Invert (Dudley Creek)	New pipe along Warrington Street to duplicate the Flockton invert	\$4.5 million (2017)	Stormwater ponding on Francis Avenue properties	Siltation	Construction disruption Limited benefits due to past application of flood intervention policy OPEX / siltation	Options assessment
5	Westminster Street	Mairehau Drain	Upgrades to Westminster Park and Westminster Street Drainage	\$1.3 million (2017)	Stormwater ponding on Westminster Street properties	Lateral spread with open channel work	Limited benefits due to past application of flood intervention policy Park impacts	Options assessment
6	Linwood	Brittans Drain / City Outfall Drain	Storage basin in Bromley Park with two pump stations to reduce flood risk in adjoining areas	\$24 million (2016)	32 properties with floor level flood risk mitigated	Land access Significant modelled residual risk Pump failure	Significant park impacts High costs	Options assessment

2

	Suburb / street / area	Waterway / catchment	Option description	CAPEX estimate (year estimated)	Benefits	Risks	Issues (incl. past decisions)	Design stage
7	Linwood	Brittans Drain / City Outfall Drain	Pump station on McGregors Road with drainage network upgrades	\$15 million (2016)	17 properties with floor level flood risk mitigated	Significant modelled residual risk Pump failure	High costs	Options assessment
8	Linwood / Wyon & Rhona Streets	City Outfall Drain	Above ground storage Pump station Stormwater network modifications to isolate subcatchment	\$4 million (2016)	1 properties with floor level and 4 with below floor flood risk mitigated	Potential for downstream impacts Land access	House raising and property purchase more viable	Options assessment
9	Bromley / Rowes Road	Estuary Drain	New pump station draining the Rowses Road area Stormwater network ugprades	\$20 million (2015)	3 properties with floor level flood risk mitigated Significant reduction in property and street flooding	Pump failure Contam. land	Past Council decision against this option	Concept design
10	Central City	Otakaro Avon River	Stopbanks, floodwalls, river bank work, associated road work and pump stations	\$45 million (2012)	Contain flooding to river corridor	Land access Pump failure	Accessibility reduced Landscape impacts	Options assessment
11	Monks Bay	Rifle Range Drain / Stormwater network	Two pumps, Barnet Park storage and backflow prevention	\$6 million (2020)	Reduce tidal and stormwater flooding in Monks Bay	Land access Disruption	Long term planning uncertain	Pre-options assessment

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05 April 2023

	Suburb / street / area	Waterway / catchment	Option description	CAPEX estimate (year estimated)	Benefits	Risks	Issues (incl. past decisions)	Design stage
12	Sumner	Sumner Stream	Pipe network and waterway upgrades	\$12.8 million (2016)	Reduce stormwater flooding and road ponding in Sumner	Land access Tidal impacts on outfalls Long-term adaptation	Currently in IS but beyond 10 yr LTP	Options assessment
13	Brooklands / Earlham Street	Barkers Drain	Enlarge Barkers drain Dredge Beacon Street Lagoon	\$1.45 million (2021)	Reduced duration of flooding of Earlham Street	Will not function if Brooklands Lagoon levels high	Will not address coastal inundation from Brooklands Lagoon	Option Assessment
14	Sockburn / Greenhurst Street	Stormwater network	Channel widening New pipe network Minor storage in Sockburn Park	\$1.1 million (2020)	Reduced floor level, property and street flooding risk in Greenhurst Street area	Modelling required to confirm feasibility and scale of benefit Land access	Park impacts	Pre-options assessment
15	Strowan	Cross and Taylors streams	Flood relief pipe	\$13 million (2020)	Reduced floor level, property and street flooding risk in Jefferys Road and Strowan Road area	Modelling required to confirm feasibility and scale of benefit	Disruption	Pre-options assessment
16	Barrington Street	Wilderness Drain	Extensive pipe network upgrade along Barrington Street	\$21 million (2020)	Reduced risk of overland flow from Barrington Park area down to Ōpāwaho Heathcote River at Tennyson Street	Modelling required to confirm feasibility and scale of benefit Services clashes	Disruption	Pre-options assessment
17	Burwood / Burwood Road and Bassett Street	Stormwater network	Networks upgrades	\$3.7 million (2020)	Drainage upgrades for isolated pockets of modelled flooding	Modelling required to confirm feasibility and scale of benefit	Disruption	Pre-options assessment

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05 April 2023

4

	Suburb / street / area	Waterway / catchment	Option description	CAPEX estimate (year estimated)	Benefits	Risks	Issues (incl. past decisions)	Design stage
18	Parklands / Mairehau Road	Stormwater network	Networks upgrades	\$3.0 million (2020)	Drainage upgrades for isolated pocket of modelled flooding	Modelling required to confirm feasibility and scale of benefit	Disruption Stormwater discharge to Travis Wetland	Pre-options assessment
19	Wigram / Vickerys Road	Haytons Stream	Network upgrades and soakage	\$1.1 million (2020)	Drainage upgrades for isolated pocket of modelled flooding	Soakage not feasible		Pre-options assessment
20	Greers Road (near Clyde intersection)	Wairarapa Stream	Culvert and channel upgrade	\$1.0 million (2020)	Reduce flood risk for stream side properties	Downstream impacts unacceptable Fish passage requires upgrades	Pass forward flows In-stream ecological impacts	Pre-options assessment
21	Dallington / McBratneys Road, Landy Street and Coopers Road	Stormwater network	Network capacity upgrades to improve drainage toward Otakaro Avon River Pump station at Locksley Avenue	\$13 million (2020)	Improved drainage for McBratneys Road, Landy Street and Coopers Road properties	Modelling required to confirm feasibility and scale of benefit	Disruption Needs integration with OARC work (timing of pumping component)	Pre-options assessment
22	Shirley / Sabina Street, Marshlands Road and Golf Links Road	No 1 Drain / Stormwater network	Network capacity upgrades	\$4.4 million (2020)	Improved drainage for Sabina Street, Marshlands Road and Golf Links Road properties	Modelling required to confirm feasibility and scale of benefit	Disruption	Pre-options assessment
23	Avondale	Stormwater network / Ōtākaro Avon River	Network realignment	\$7.1 million (2020)	Reduced dry weather flooding, improved drainage for Breezes Road, Eglington Street, Belmont Street area	Modelling required to confirm feasibility and scale of benefit	Needs integration with OARC work (timing of pumping and storage component)	Pre-options assessment

5

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	Suburb / street / area	Waterway / catchment	Option description	CAPEX estimate (year estimated)	Benefits	Risks	Issues (incl. past decisions)	Design stage
24	St Martins / Hillsborough Terrace and Vernon Terrace	Popes Stream	Culvert and waterway upgrades	\$1.2 million (2020)	Reduce flood risk for stream side properties	Land access Management of lateral spread Modelling required to confirm feasibility and scale of benefit	In-stream ecological impacts Disruption	Pre-options assessment
25	Avondale / Newport Street	Tenby Place Drain	Pipe network upgrades	\$1.7 million (2020)	Reduce flood risk for Tenby Place and Newport Street area	Modelling required to confirm feasibility and scale of benefit	Needs integration with OARC work (timing of pumping component)	Pre-options assessment
26	Marion Street	Ballintines Drain / Upper Heathcote	Pump, backflow prevention and storage	\$2.4 million (2020)	Reduced flood risk for Marion Street area	Modelling required to confirm feasibility and scale of benefit	Possible integration with Upper Heathcote Storage Scheme	Pre-options assessment
27	Blighs Road	Upper Dudley Creek	Channel naturalisation and culvert upgrade Significant land purchase	\$13.6 million (2020)	Reduce flood risk for creek side properties	Modelling required to confirm feasibility and scale of benefit Potential for downstream impacts	Unlikely to be viable In-stream ecological impacts Pass forward flows	Pre-options assessment

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05 April 2023

6

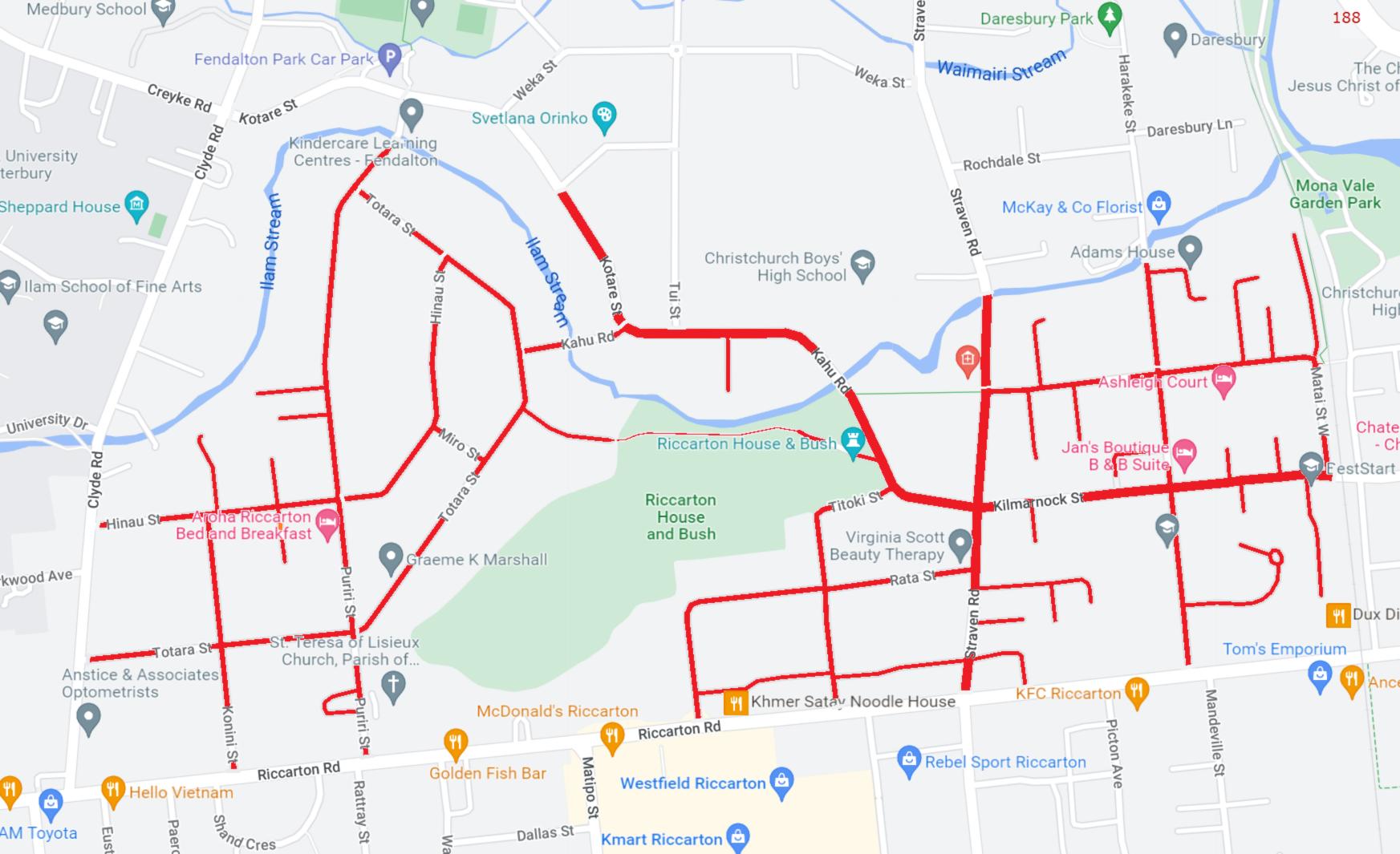
Christchurch City Council

	Suburb / street / area	Waterway / catchment	Option description	CAPEX estimate (year estimated)	Benefits	Risks	Issues (incl. past decisions)	Design stage
28	Riccarton	Riccarton Stream	Waterway upgrades	\$7.8 million (2020)	Reduce flood risk for creek side properties	Modelling required to confirm feasibility and scale of benefit	Unlikely to be viable Pass forward flows	Pre-options assessment
						Potential for downstream impacts		
						Land access Structural risk to properties		
29	Redwood / Providence Place and Grimseys Road	Kruses Drain	Drain widening and pipe network upgrades	\$4.3 million (2020)	Reduce flood risk in Providence Place area	Modelling required to confirm feasibility and scale of benefit Land access NArt restriction not considered	Unlikely to be viable Possible integration with Cranford Basin North Storage Scheme	Pre-options assessment
30	Papanui / Taunton Green	Papanui Drain	Channel widening	\$2.2 million (2020)	Reduced flood risk for drain side properties and adjoining streets up to Grants Road	Land access Lateral spread	Assumed to be completed in conjunction with funded renewal work but this work is now complete	Pre-options assessment
							Cost for widening will now be significantly higher	

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05 April 2023

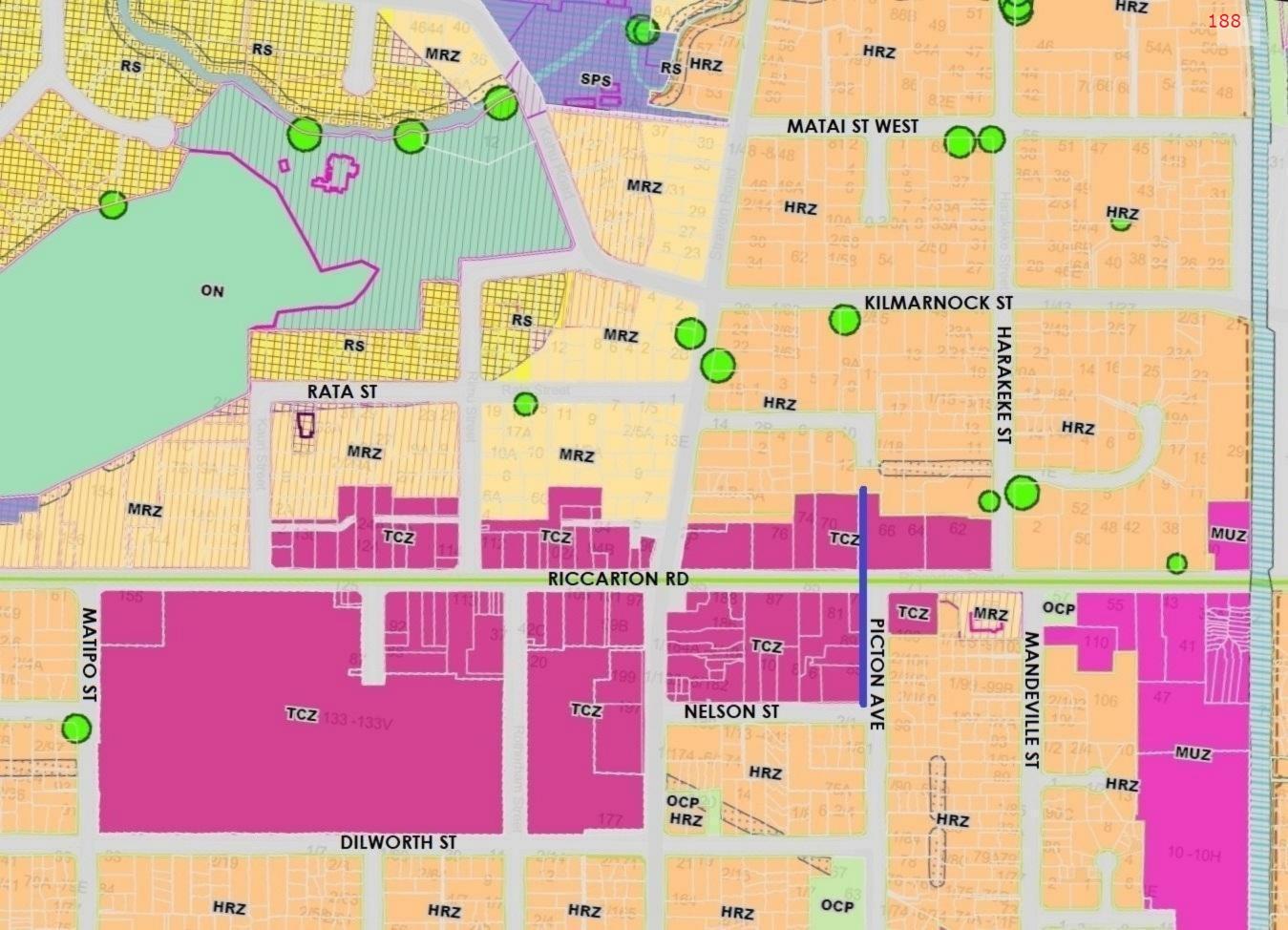
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The potential result of permitted medium density standards in a typical Otautahi/Christchurch suburb.

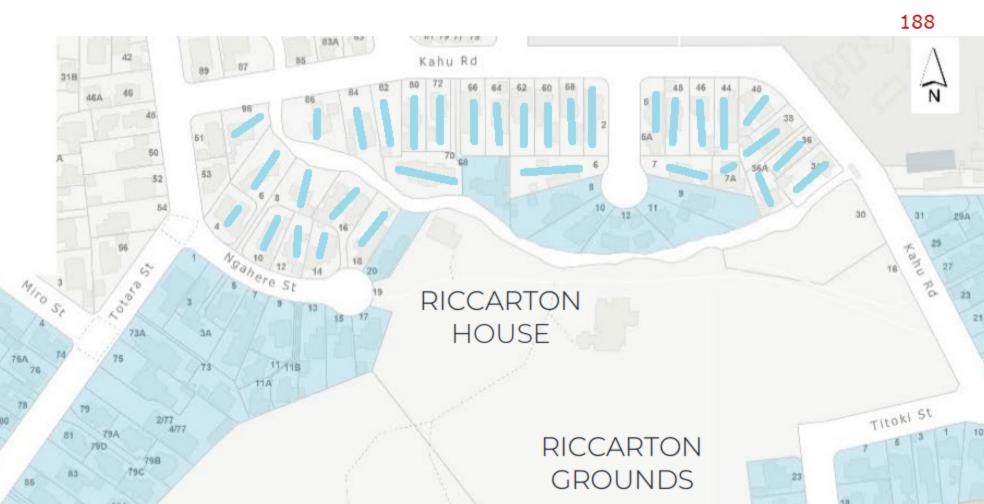


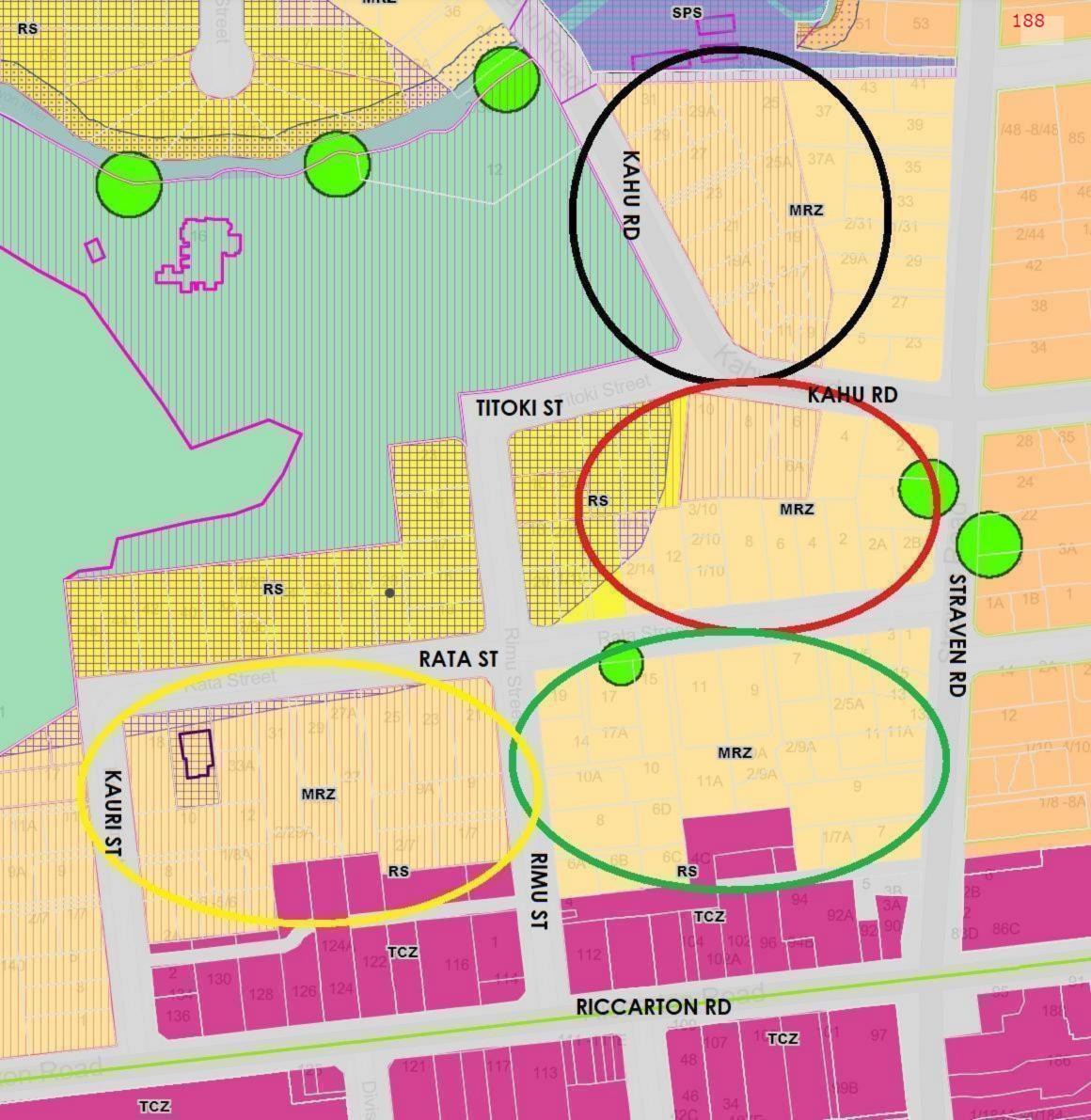


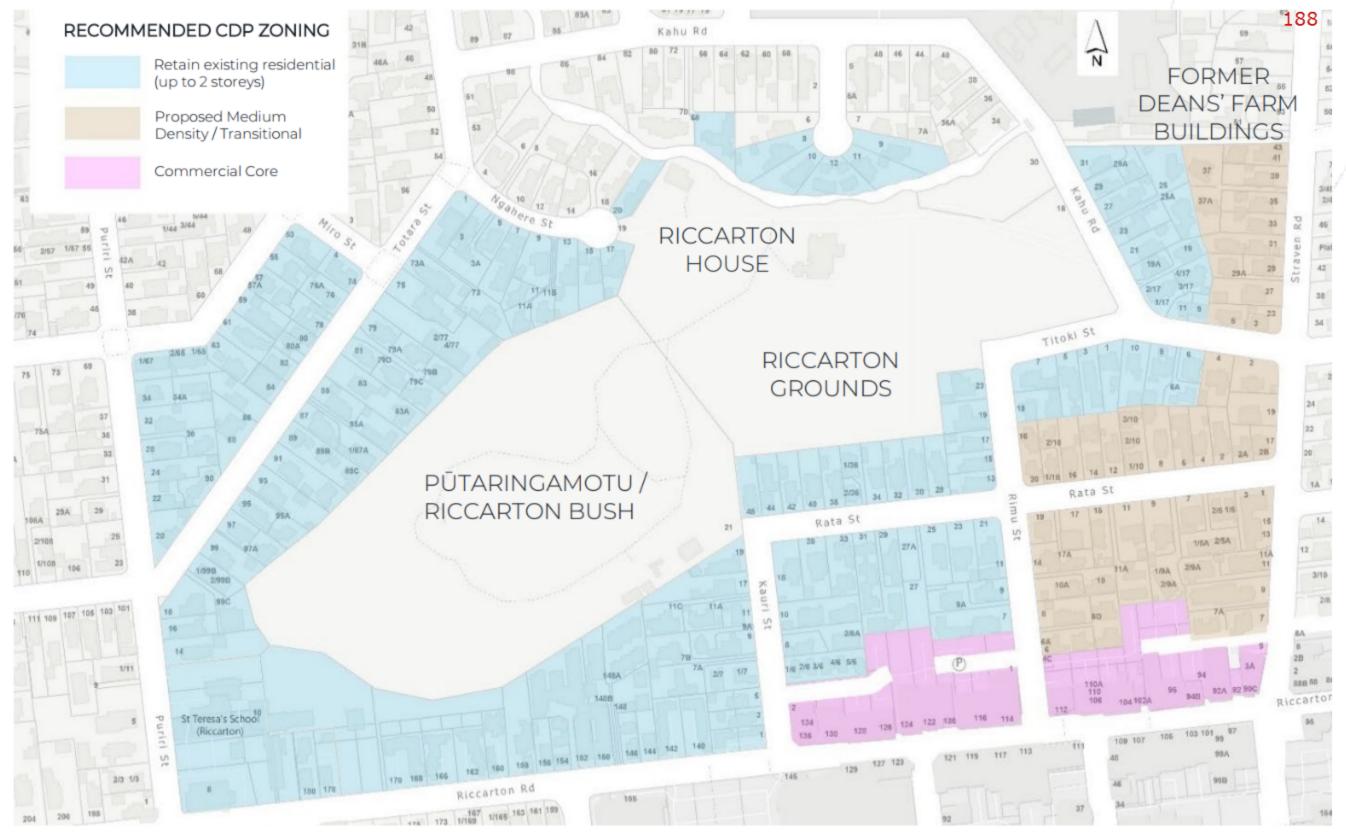
View south across Girvan St from CBHS on Kahu Rd

View south from Kotare St with Riccarton Bush in the background

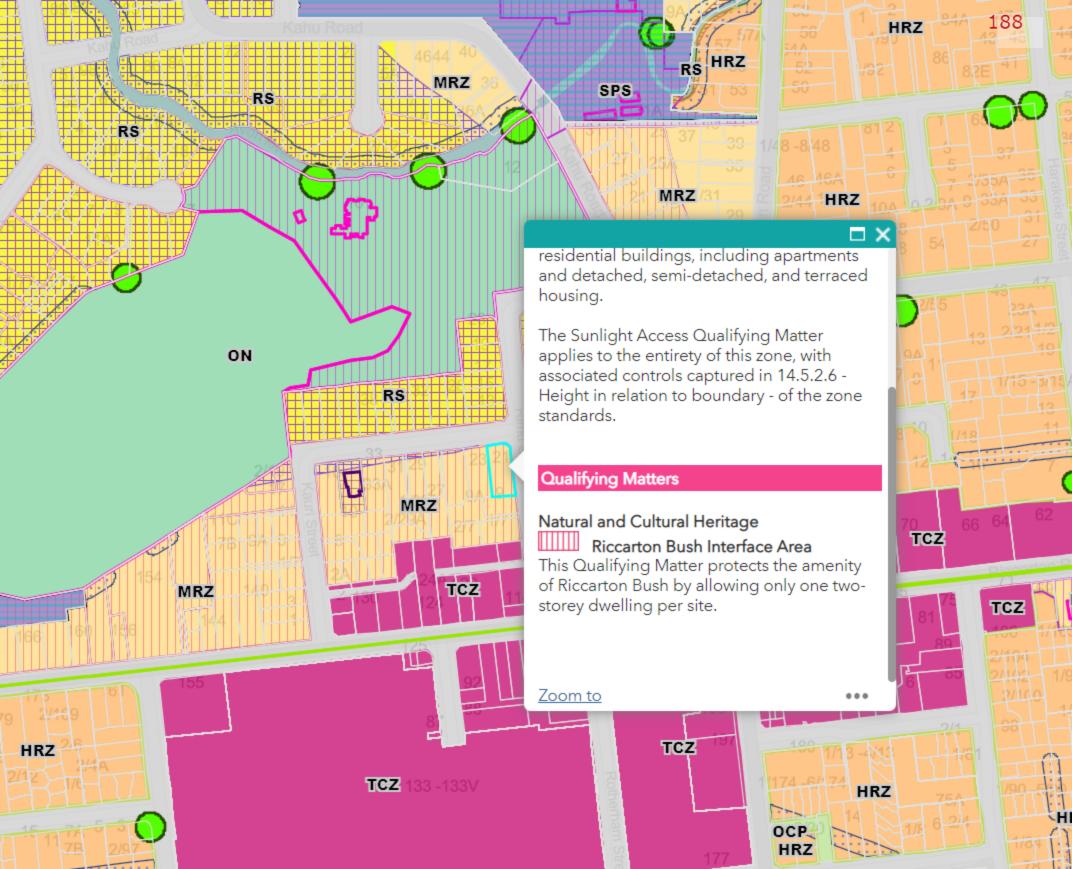


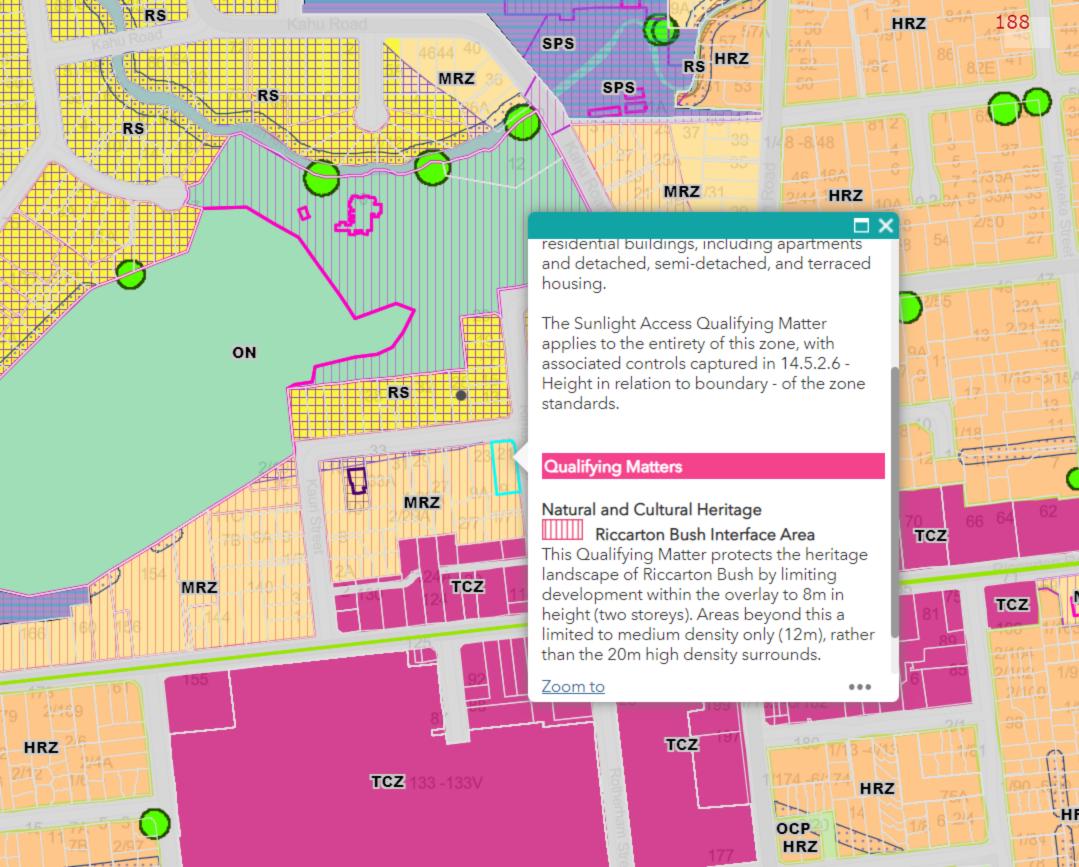


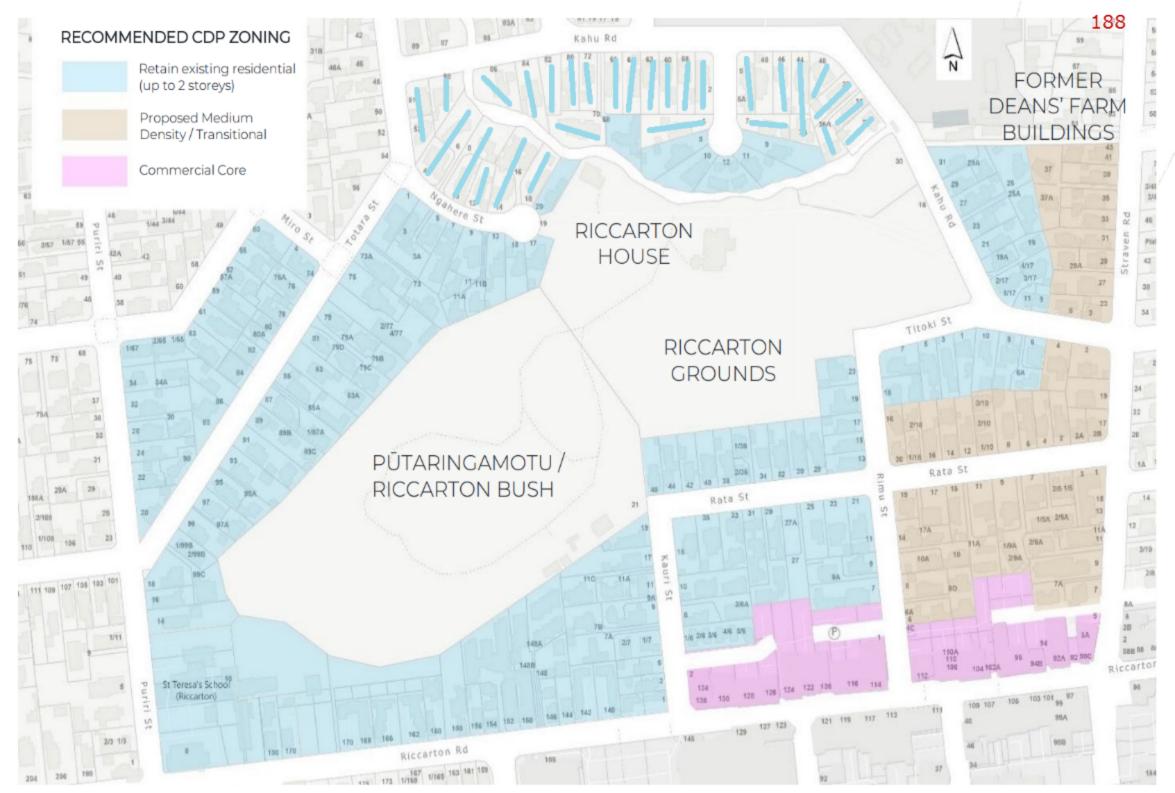




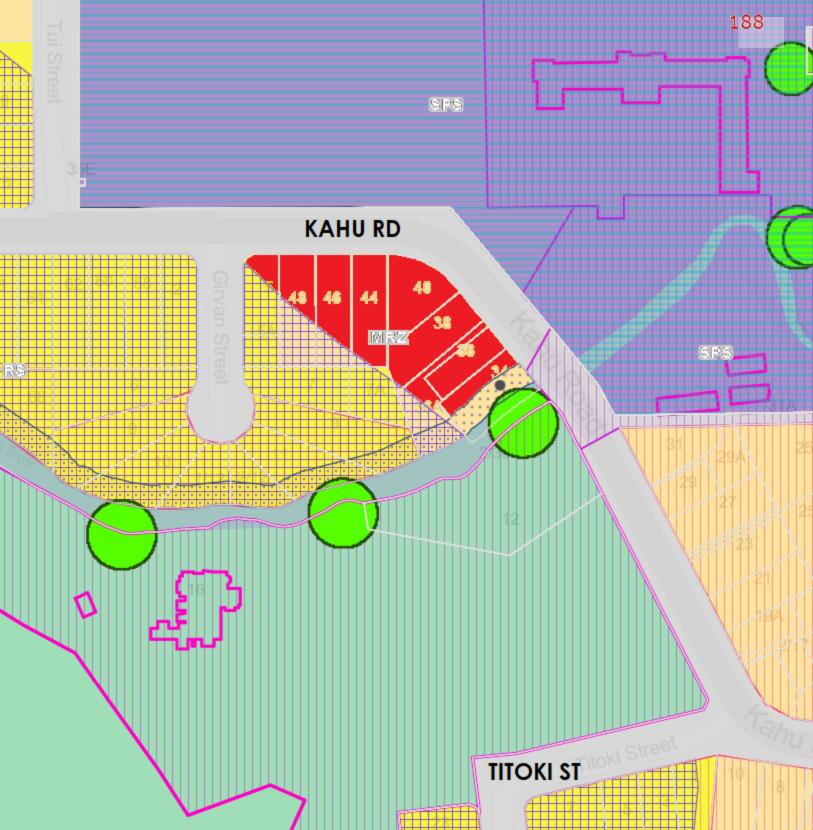
Recommended modifications and additions to Christchurch City Council proposed protection and setbacks for Pūtaringamotu.

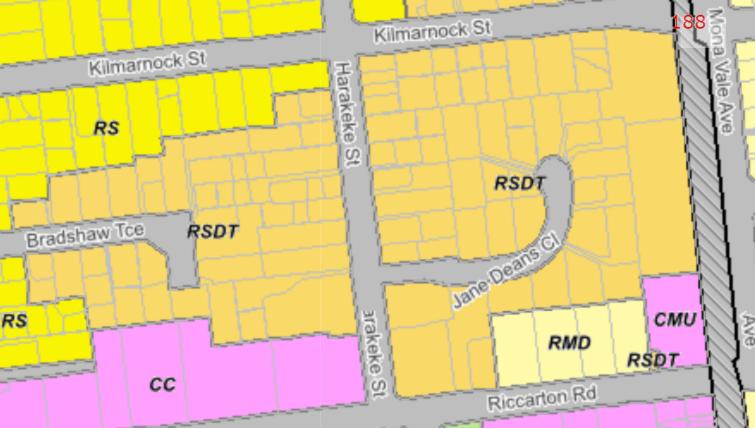








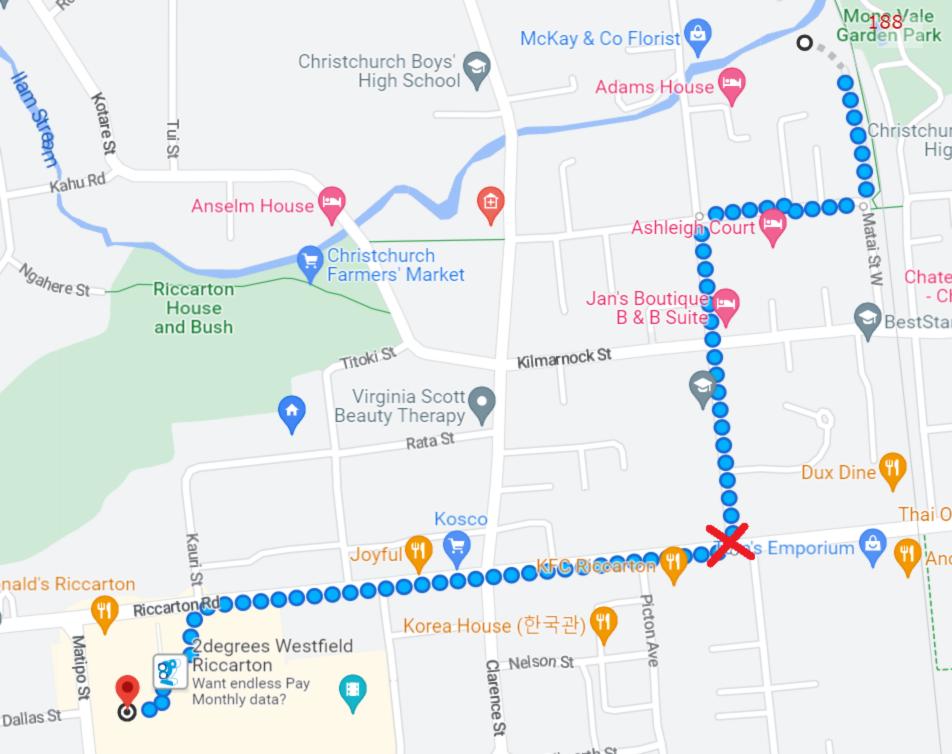


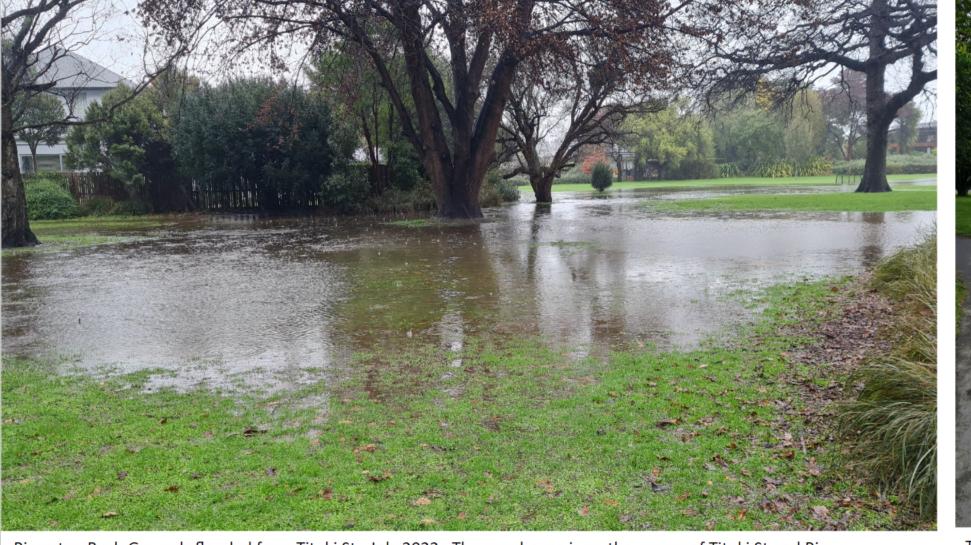


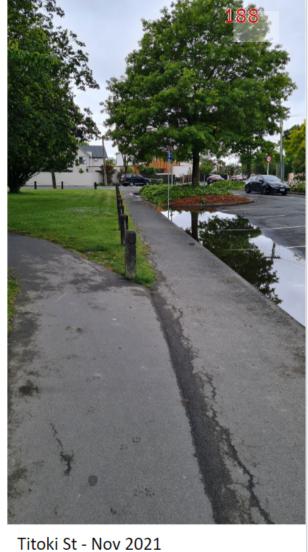












Riccarton Bush Grounds flooded from Titoki St - July 2022. The grey house is on the corner of Titoki St and Rimu

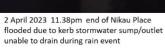


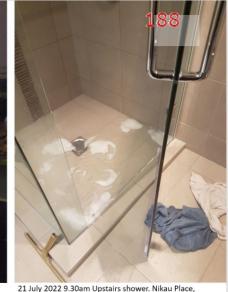


Ngahere St at the entrance to Riccarton House and Bush









21 July 2022 9.30am Upstairs shower. Nikau Place, unable to drain away due insufficient waste water network capacity/overflow from stormwater network. If we had flushed the toilet the bowl would likely have overflowed.





Bradshaw Terrace after moderate rainfall

MEMORANDUM OF LANDSCAPE OBSERVATIONS & INITIAL RECOMMENDATIONS

Christchurch District Plan, Plan Change 14

For the areas within the Riccarton Bush - Kilmarnock Residents' Association zone.

ISSUE: TO ACCOMPANY SUBMISSION ON PC14

Date: 8 May 2023

Prepared by:

Kamo Marsh Landscape Architects Ltd P. O. Box 2833 Christchurch

Tel: (03) 366-8181



MEMORANDUM OF LANDSCAPE OBSERVATIONS & INITIAL **RECOMMENDATIONS**

Project no: 5381

Revision: B

Date: 8 May 2023

Author: Bridget Robilliard - Registered Landscape Architect (NZILA) Reviewed by: Jade Au Morris - Registered Landscape Architect (NZILA)

Contents

1.	Introduction	4
	Methodology	
ა.	Landscape Observations and initial recommendations	ວ

Notes:

- o Images captured on Fuji film X-T10 camera with XF 50mm zoom lens.
- o Date: 27th April 2023 between 2.33pm and 4.27pm.
- o Height of 1.65m.
- o Each view includes several photos merged together to create a panorama view, to provide 124 degree viewing angle to meet NZILA best practise guidelines
- Photo sizes are adjusted to suit document layout, original images can be provided if required.

1. INTRODUCTION

- 1.1 This memorandum of landscape observations and initial recommendations has been prepared to form part of the submission on the proposed Christchurch District Plan, Plan Change 14 by the Riccarton Bush Kilmarnock Residents' Association.
- 1.2 The areas which were assessed for the preparation of this memorandum were areas that sit within the Riccarton Bush Kilmarnock Residents Association's boundary, with focus on key areas within the zone which have been identified by the Residents' Association, with the advice from Christchurch City Council staff, as requiring the professional advice of a landscape architect.
- 1.3 It is intended that this memorandum forms part of the submission and that further investigation and a formal landscape assessment shall be carried out following the submission if required.

2. METHODOLOGY

- 2.1 Relevant sections of the proposed Plan Change 14 have been reviewed prior to preparation of this memorandum, with particular focus on:
 - Section 32 evaluation item 6.11 Building heights adjoining Riccarton Bush,
 - Appendix 43 Pūtaringamotu Riccarton Bush Heritage Landscape Review.
- 2.2 The site visit and preparation of this memorandum has been undertaken by Bridget Robilliard (Registered NZILA Landscape Architect) from KM. The memorandum has been reviewed by Jade Au Morris, a Registered NZILA Landscape Architect from KM.

3. LANDSCAPE OBSERVATIONS & INITIAL RECOMMENDATIONS

The following sections relate to key areas within the Riccarton Bush-Kilmarnock Residents' Association zone in which landscape architecture advice was requested. These sections include initial observations of potential impacts of the proposed Plan Change 14 on the landscape character and features. Preliminary recommendations have been included where deemed to be appropriate.



Figure 1. Map indicating areas of discussion, outlined in black. Not to scale.

A. RICCARTON BUSH INTERFACE AREA

- I. <u>Location:</u> The extent of the Riccarton Bush Interface area_was assessed during the site visit. The zone considered to have visual impact for both outward looking views from Riccarton Bush and House grounds and inward looking views from the surrounding areas was reviewed.
 - <u>Discussion:</u> It was found that the zone noted to be considered as the Riccarton Bush interface area in appendix 43, and incorporated into the proposed plans, aligned with our assessment with the exemption three lots which we believe should also be included within the zone. During our site visit it was found that 34, 36 and 36A Kahu Road also held a strong visual impact to both outward views from the Riccarton House Grounds and inward views from the public road. The location of two of these sections adjacent to the Ōtākaro/ Avon River would also suggest that development would have a greater visual impact as a contrast to a natural landscape feature. Note: The observation of Riccarton Bush and Riccarton House grounds being intrinsically tied as noted in Appendix 43 was also adopted during this preliminary assessment.

Recommendation: We recommend that 34, 36 and 36A Kahu Road be included within The Riccarton Bush Interface Area.

<u>Note:</u> Any further change to the proposed zoning rules within the area surrounding Riccarton Bush, including areas not currently considered to be within the Bush interface area, should consider any potential adverse effects on visual amenity and landscape character.



Figure 2. View from the north-eastern area of Riccarton House grounds looking north towards 34 and 36A Kahu Road across the Ōtākaro/ Avon River.



Figure 3. View from the Kahu Road bridge over the Ōtākaro/ Avon River looking south west with the Riccarton House Grounds on the left and 34 Kahu road on the right.

II. <u>Location:</u> The potential visual impacts of properties which face the Riccarton House Grounds was considered during the site visit. This was in regard to 9 to 35 Kahu Road, and 6 to 10 Kahu Road, which are included in the Riccarton Bush Interface Area.

<u>Discussion:</u> This initial assessment also took into consideration visualisations included in Appendix 43 in relation to these frontages. The outward looking views of this area from the Riccarton House Grounds has the potential to have a high adverse visual impact of the visual character of the main entrance into Riccarton House Grounds and from the southern area of the grounds. It was also considered appropriate that the physical connection with this area to the historic Deans Farm buildings, as noted in Appendix 43, be taken into consideration in regard to landscape character as a space linking the historic Dean's Family buildings.

Recommendation: That further visual simulations be developed which explore potential benefits to visual amenity and landscape character of an increased set back (greater than the proposed 1.5m) from the road boundary. Should these visualisations indicate a reduced visual impact, it is recommended that the inclusion of a greater road set back to properties within the Riccarton Bush Interface area which face the Riccarton Bush and House grounds be incorporated into Section 14.



Figure 4.Looking east towards Kahu Road from the main entrance into the Riccarton House Grounds.

III. Location: Sections physically adjoining Riccarton Bush and House Grounds were assessed for both outward and inward views, while other potential implications such as the health and maintenance of The Bush were also considered. Discussion: Generally, site observations agreed with those noted in Appendix 43 and aligned with the extent of the zoning proposed in Plan Change 14. It is considered that there is potential for high adverse visual impact by development to sections directly to the south of Riccarton Bush and Riccarton House Grounds as there is a degree of visibility from the southern section of Te Ara Karariki trail. Current visual impact is limited by the position of built structure, materiality and colour and planting of these dwellings. It is suggested that further considerations of impacts and additional requirements be implemented if deemed necessary. The protection of vegetation along this boundary is also of great importance to the visual amenity for both inward and outward views as well as of historical value. This area was where the historically Pūtaringamotu extended past the current size, prior to harvesting and full removal by The Canterbury Association. Much conservation effort has been made by both the Dean's family, and later by The Riccarton Bush Trust, to ensure this boundary provide suitable protection for the larger Bush area. The health and maintenance of the bush along all boundaries is of high importance to retain the biodiversity, visual amenity and landscape character of the site and neighbouring boundaries. The development of properties adjoining Pūtaringamotu/ Riccarton Bush also have the potential to have implications of the management of The Bush, it is considered appropriate that aspects which will minimize risk of damage to The Bush, by elements such as predator intrusion and fire, from development to neighbouring properties be integrated into Plan Change 14.

Recommendations:

- That further visual simulations are developed to assess the potential impact of building positions, material and colours to properties directly adjoining the southern area of Riccarton Bush and House. Should potential for adverse effects be found then recommendations from these assessments should be included within Plan Change 14.
- An arborist and ecologist are engaged to assess potential impact of the health of Pūtaringamotu/ Riccarton Bush by possible development directly around the edge of Riccarton Bush, and any recommendations and integrated into Plan Change 14.

That the Riccarton Bush Trust be consulted regarding considerations for impacts on the management of Riccarton Bush from neighbouring development.

B. KAURI CLUSTER

I. Location: The Kauri Cluster refers to Kauri Street, Rata Street and Rimu Street, bounded by Riccarton Road to the South and Straven Road to the East. Discussion: Landscape improvements were carried out in 2008/2009 by Christchurch City Council and included the planting of native street trees which have now reached an intermediate size and appear to be in good health. The current landscape character of the area is in keeping with the proximity of Riccarton Bush and House. It is considered possible that the permitted development so close to the road boundary may have detrimental impacts to established vegetation through changes to microclimates of shading and wind and disturbance or root runs. The establishment of a number of specimen trees in close proximity to Riccarton Bush and House may be and/or may have potential to provide ecological benefits, which if found to be of value should be maintained.

Recommendations:

- That an ecologist be engaged to assess the ecological value of the protection of the existing native vegetation within the Road Reserve.
- That an arborist be engaged to assess the potential impacts of the proposed permitted development of the established vegetation and recommendations for protection of the vegetation be considered and incorporated into Plan Change 14.

C. MATAI STREET WEST

I. Location: A Cycle path is located to the northern side of Matai Street West. This is a proposed High Density Residential Zone, with permitted heights up to 14m. The bike lane connects from The University of Canterbury to the CBD. This section of the bike trail and the footpath to the northern side of Matai Street West appear to be heavily used by Christchurch Girls High School and Christchurch Boys High School student, with the schools located at either end of the road.

Discussion: It is considered that the proposed height of 14 meters and 1.5m set back distance from the road frontage that would be permitted in this area may have safety implications due to shading to the cycle and footpath during the

winter months. This could increase the frost and ice present on the path, and how long the ice/frost lasts during the day. During the site visit it was observed that some shading already occurs from a limited number of properties during the afternoon in April.

<u>Recommendation:</u> That shading diagrams be developed and a traffic safety assessment be carried out for consideration of safety impacts. Should potential for safety issues be found it is recommended that height and or set back allowance to northern properties are reviewed.



Figure 5. The western end of Matai Street West looking West.

II. <u>Location:</u> Specimen trees planted between the cycle path and carriage way to the north and between the carriage way and the footpath to the south of the road are of an intermediate size and appear to be in good health. The establishment and protection of specimen trees along this road is considered to be of particular value as this road physically and visually links the historic sites of Mona Vale and Riccarton Bush and House.

<u>Discussion:</u> It is considered that the shade and proximity of possible development to the road reserve boundary (1.5m) may have detrimental effects to the established vegetation.

Recommendation: That an arborist is engaged to assess possible impacts on existing vegetation from the proposed development. Should it be found that there are risks to the health of the existing vegetation it is recommended that this be considered and incorporated into Plan Change 14.

MEMORANDUM OF LANDSCAPE OBSERVATIONS & INITIAL RECOMMENDATIONS

Christchurch District Plan, Plan Change 14

For the areas within the Riccarton Bush - Kilmarnock Residents' Association zone.

ISSUE: TO ACCOMPANY SUBMISSION ON PC14

Date: 8 May 2023

Prepared by:

Kamo Marsh Landscape Architects Ltd P. O. Box 2833 Christchurch

Tel: (03) 366-8181



MEMORANDUM OF LANDSCAPE OBSERVATIONS & INITIAL **RECOMMENDATIONS**

Project no: 5381

Revision: B

Date: 8 May 2023

Author: Bridget Robilliard - Registered Landscape Architect (NZILA) Reviewed by: Jade Au Morris - Registered Landscape Architect (NZILA)

Contents

1.	Introduction	4
	Methodology	
ა.	Landscape Observations and initial recommendations	ວ

Notes:

- o Images captured on Fuji film X-T10 camera with XF 50mm zoom lens.
- o Date: 27th April 2023 between 2.33pm and 4.27pm.
- o Height of 1.65m.
- o Each view includes several photos merged together to create a panorama view, to provide 124 degree viewing angle to meet NZILA best practise guidelines
- Photo sizes are adjusted to suit document layout, original images can be provided if required.

1. INTRODUCTION

- 1.1 This memorandum of landscape observations and initial recommendations has been prepared to form part of the submission on the proposed Christchurch District Plan, Plan Change 14 by the Riccarton Bush Kilmarnock Residents' Association.
- 1.2 The areas which were assessed for the preparation of this memorandum were areas that sit within the Riccarton Bush Kilmarnock Residents Association's boundary, with focus on key areas within the zone which have been identified by the Residents' Association, with the advice from Christchurch City Council staff, as requiring the professional advice of a landscape architect.
- 1.3 It is intended that this memorandum forms part of the submission and that further investigation and a formal landscape assessment shall be carried out following the submission if required.

2. METHODOLOGY

- 2.1 Relevant sections of the proposed Plan Change 14 have been reviewed prior to preparation of this memorandum, with particular focus on:
 - Section 32 evaluation item 6.11 Building heights adjoining Riccarton Bush,
 - Appendix 43 Pūtaringamotu Riccarton Bush Heritage Landscape Review.
- 2.2 The site visit and preparation of this memorandum has been undertaken by Bridget Robilliard (Registered NZILA Landscape Architect) from KM. The memorandum has been reviewed by Jade Au Morris, a Registered NZILA Landscape Architect from KM.

3. LANDSCAPE OBSERVATIONS & INITIAL RECOMMENDATIONS

The following sections relate to key areas within the Riccarton Bush-Kilmarnock Residents' Association zone in which landscape architecture advice was requested. These sections include initial observations of potential impacts of the proposed Plan Change 14 on the landscape character and features. Preliminary recommendations have been included where deemed to be appropriate.



Figure 1. Map indicating areas of discussion, outlined in black. Not to scale.

A. RICCARTON BUSH INTERFACE AREA

- I. <u>Location:</u> The extent of the Riccarton Bush Interface area_was assessed during the site visit. The zone considered to have visual impact for both outward looking views from Riccarton Bush and House grounds and inward looking views from the surrounding areas was reviewed.
 - <u>Discussion:</u> It was found that the zone noted to be considered as the Riccarton Bush interface area in appendix 43, and incorporated into the proposed plans, aligned with our assessment with the exemption three lots which we believe should also be included within the zone. During our site visit it was found that 34, 36 and 36A Kahu Road also held a strong visual impact to both outward views from the Riccarton House Grounds and inward views from the public road. The location of two of these sections adjacent to the Ōtākaro/ Avon River would also suggest that development would have a greater visual impact as a contrast to a natural landscape feature. Note: The observation of Riccarton Bush and Riccarton House grounds being intrinsically tied as noted in Appendix 43 was also adopted during this preliminary assessment.

Recommendation: We recommend that 34, 36 and 36A Kahu Road be included within The Riccarton Bush Interface Area.

<u>Note:</u> Any further change to the proposed zoning rules within the area surrounding Riccarton Bush, including areas not currently considered to be within the Bush interface area, should consider any potential adverse effects on visual amenity and landscape character.



Figure 2. View from the north-eastern area of Riccarton House grounds looking north towards 34 and 36A Kahu Road across the Ōtākaro/ Avon River.



Figure 3. View from the Kahu Road bridge over the Ōtākaro/ Avon River looking south west with the Riccarton House Grounds on the left and 34 Kahu road on the right.

II. <u>Location:</u> The potential visual impacts of properties which face the Riccarton House Grounds was considered during the site visit. This was in regard to 9 to 35 Kahu Road, and 6 to 10 Kahu Road, which are included in the Riccarton Bush Interface Area.

<u>Discussion:</u> This initial assessment also took into consideration visualisations included in Appendix 43 in relation to these frontages. The outward looking views of this area from the Riccarton House Grounds has the potential to have a high adverse visual impact of the visual character of the main entrance into Riccarton House Grounds and from the southern area of the grounds. It was also considered appropriate that the physical connection with this area to the historic Deans Farm buildings, as noted in Appendix 43, be taken into consideration in regard to landscape character as a space linking the historic Dean's Family buildings.

Recommendation: That further visual simulations be developed which explore potential benefits to visual amenity and landscape character of an increased set back (greater than the proposed 1.5m) from the road boundary. Should these visualisations indicate a reduced visual impact, it is recommended that the inclusion of a greater road set back to properties within the Riccarton Bush Interface area which face the Riccarton Bush and House grounds be incorporated into Section 14.



Figure 4.Looking east towards Kahu Road from the main entrance into the Riccarton House Grounds.

III. Location: Sections physically adjoining Riccarton Bush and House Grounds were assessed for both outward and inward views, while other potential implications such as the health and maintenance of The Bush were also considered. Discussion: Generally, site observations agreed with those noted in Appendix 43 and aligned with the extent of the zoning proposed in Plan Change 14. It is considered that there is potential for high adverse visual impact by development to sections directly to the south of Riccarton Bush and Riccarton House Grounds as there is a degree of visibility from the southern section of Te Ara Karariki trail. Current visual impact is limited by the position of built structure, materiality and colour and planting of these dwellings. It is suggested that further considerations of impacts and additional requirements be implemented if deemed necessary. The protection of vegetation along this boundary is also of great importance to the visual amenity for both inward and outward views as well as of historical value. This area was where the historically Pūtaringamotu extended past the current size, prior to harvesting and full removal by The Canterbury Association. Much conservation effort has been made by both the Dean's family, and later by The Riccarton Bush Trust, to ensure this boundary provide suitable protection for the larger Bush area. The health and maintenance of the bush along all boundaries is of high importance to retain the biodiversity, visual amenity and landscape character of the site and neighbouring boundaries. The development of properties adjoining Pūtaringamotu/ Riccarton Bush also have the potential to have implications of the management of The Bush, it is considered appropriate that aspects which will minimize risk of damage to The Bush, by elements such as predator intrusion and fire, from development to neighbouring properties be integrated into Plan Change 14.

Recommendations:

- That further visual simulations are developed to assess the potential impact of building positions, material and colours to properties directly adjoining the southern area of Riccarton Bush and House. Should potential for adverse effects be found then recommendations from these assessments should be included within Plan Change 14.
- An arborist and ecologist are engaged to assess potential impact of the health of Pūtaringamotu/ Riccarton Bush by possible development directly around the edge of Riccarton Bush, and any recommendations and integrated into Plan Change 14.

That the Riccarton Bush Trust be consulted regarding considerations for impacts on the management of Riccarton Bush from neighbouring development.

B. KAURI CLUSTER

I. Location: The Kauri Cluster refers to Kauri Street, Rata Street and Rimu Street, bounded by Riccarton Road to the South and Straven Road to the East. Discussion: Landscape improvements were carried out in 2008/2009 by Christchurch City Council and included the planting of native street trees which have now reached an intermediate size and appear to be in good health. The current landscape character of the area is in keeping with the proximity of Riccarton Bush and House. It is considered possible that the permitted development so close to the road boundary may have detrimental impacts to established vegetation through changes to microclimates of shading and wind and disturbance or root runs. The establishment of a number of specimen trees in close proximity to Riccarton Bush and House may be and/or may have potential to provide ecological benefits, which if found to be of value should be maintained.

Recommendations:

- That an ecologist be engaged to assess the ecological value of the protection of the existing native vegetation within the Road Reserve.
- That an arborist be engaged to assess the potential impacts of the proposed permitted development of the established vegetation and recommendations for protection of the vegetation be considered and incorporated into Plan Change 14.

C. MATAI STREET WEST

I. Location: A Cycle path is located to the northern side of Matai Street West. This is a proposed High Density Residential Zone, with permitted heights up to 14m. The bike lane connects from The University of Canterbury to the CBD. This section of the bike trail and the footpath to the northern side of Matai Street West appear to be heavily used by Christchurch Girls High School and Christchurch Boys High School student, with the schools located at either end of the road.

Discussion: It is considered that the proposed height of 14 meters and 1.5m set back distance from the road frontage that would be permitted in this area may have safety implications due to shading to the cycle and footpath during the

winter months. This could increase the frost and ice present on the path, and how long the ice/frost lasts during the day. During the site visit it was observed that some shading already occurs from a limited number of properties during the afternoon in April.

<u>Recommendation:</u> That shading diagrams be developed and a traffic safety assessment be carried out for consideration of safety impacts. Should potential for safety issues be found it is recommended that height and or set back allowance to northern properties are reviewed.



Figure 5. The western end of Matai Street West looking West.

II. <u>Location:</u> Specimen trees planted between the cycle path and carriage way to the north and between the carriage way and the footpath to the south of the road are of an intermediate size and appear to be in good health. The establishment and protection of specimen trees along this road is considered to be of particular value as this road physically and visually links the historic sites of Mona Vale and Riccarton Bush and House.

<u>Discussion:</u> It is considered that the shade and proximity of possible development to the road reserve boundary (1.5m) may have detrimental effects to the established vegetation.

Recommendation: That an arborist is engaged to assess possible impacts on existing vegetation from the proposed development. Should it be found that there are risks to the health of the existing vegetation it is recommended that this be considered and incorporated into Plan Change 14.

Our proposed Housing and Business Choice Plan Change (14)



Submitter Details

Submission Date: 03/05/2023

First name: Matt Last name: Edwards

Prefered method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Support

I seek the following decision from the Council

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

Ensure that this ensure stays in new District Plan

My submission is that: Relevant clause: 14.2.6.

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

Provision: Chapter 14 Residential

Support

I seek the following decision from the Council

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

My submission is that:

Relevant clause: 14.2.7.

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

Provision: Chapter 14 Residential

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:

Relax requirements for the removal of recession planes to make it more feasible to developers to build on the front of a site.

My submission is that:

Relevant clause: 14.6.2.2.c.iv.

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

Provision: Chapter 14 Residential

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 Sunlight Access QM

My submission is that:

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

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

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

Provision: Chapter 14 Residential

Seek Amendment

I seek the following decision from the Council

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

Reduce the area of the Ric Bush interface back to the current level of 40 sites.

My submission is that:

Relevant clause: 14.5.2.3.v and 14.4.2.3.iv (2 clauses as this area is currently covered by two different zones that will merge into MRZ). Expansion of area covered in PC14 Planning Maps 31.

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

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

Provision: Chapter 14 Residential

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 Low PT Access QM

My submission is that:

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

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

Provision: Chapter 14 Residential

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 recession planes for taller buildings in HRZ, while maintaining height limits which was intention of NPS-UD.

My submission is that:

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

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

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

Attached Documents		
	Name	
Benefits of Density		E

Affordability: Increasing housing density, both in the city centre and suburbs, would increase the overall housing stock. Reduced housing supply is one of the main drivers of housing unaffordability¹. This is a major issue in New Zealand, where housing construction rates have been declining since the building boom of the 1960s and 70s². This has coincided with an explosion in house prices across the country, which have increased 425% over the past 20 years³. Christchurch is not immune to these issues. While its housing cost to household income ratio of 6.9 in Q2 2022 was lower than other major centres⁴ this is still well above 5 which is when a market is considered 'severely unaffordable'⁵. Christchurch also has the second highest rent to income ratio amongst all major centres in Aotearoa⁶.

Restrictive zoning laws, which force people to build low-density houses, artificially slow down the supply of homes. This lack of supply leads to price increases⁷. There is clear demand in Christchurch for denser housing, as evidenced by the boom in townhouse construction, so CCC should take advantage of this as a means of improving housing affordability.

Sustainability: Denser housing leads to decreased household emissions⁸. Road transport emissions are the single biggest factor in Christchurch's overall emissions profile, and so the council has made a decrease in transport emissions a key part of their emissions reduction plan⁹. Building denser housing, close to key public transport routes, would help to achieve this reduction. With people living closer to employment, services, and amenities, they are more likely to use public or active transport. This would also have health and wellbeing benefits: active transport use can improve physical health, while reduced commutes would mean that people can spend more time socialising, exercising, and partaking in hobbies.

Community: Urban density is associated with improved safety and increased economic vibrancy. Increased number and diversity of people means that streets and amenities are used throughout the day, rather than just in distinct time periods. This increases the demand and resources for amenities as well as increases the safety of our streets and neighbourhoods, with more people being out and about. This array of people is also associated with increased community cohesion due to regular interactions in shared spaces.

Economics: By increasing the number of units within the city, intensification provides new revenue streams for infrastructure improvements. Chronic under-investment in assets is further perpetuated by

¹ Housing Affordability. Re-imagining the Australian Dream. Grattan Institute. March 2018.

² The decline of housing supply in New Zealand: Why it happened and how to reverse it. New Zealand Infrastructure Commission. March 2022.

³ Housing affordability in Aotearoa New Zealand: The importance of urban land supply, interest rates, and tax. The Treasury. 9 September 2022.

⁴ https://www.corelogic.co.nz/news-research/news/2022/hope-for-housing-affordability-as-property-prices-fall

⁵ https://www.pwc.co.nz/pdfs/2018pdfs/affordable-housing-publication-nz-18.pdf

⁶ https://www.corelogic.co.nz/news-research/news/2022/hope-for-housing-affordability-as-property-prices-fall ⁷ Lees, K. (2017). Quantifying the impact of land use regulation: Evidence from New Zealand, Sense Partners,

Report for Superu, Ministerial Social Sector Research Fund.

⁸ Lee, S., & Lee, B. (2014). The influence of urban form on GHG emissions in the U.S. household sector. *Energy Policy, 68*, 534-549. https://doi.org/10.1016/j.enpol.2014.01.024

⁹ https://ccc.govt.nz/environment/climateaction/whats-our-way-to-carbon-zero#:~:text=The%20aim%20is%20to%20halve,become%20carbon%20zero%20by%202045.

low-density greenfield development that requires investment in new infrastructure. This takes money away from upgrading existing infrastructure that benefits existing communities. These benefits include flood mitigation measures and other improvements. Increased urban sprawl is linked to increased operational costs for local authorities¹⁰, as services such as rubbish collection and sewage treatment are more expensive to maintain per person in low-density areas¹¹.

¹⁰ Varela-Candamio, L., Rubiera Morollón, F., & Sedrakyan, G. (2019). Urban sprawl and local fiscal burden: analysing the Spanish case. *Empirica*, *46*(1), 177-203

¹¹ Carruthers, J. I., & Ulfarsson, G. F. (2003). Urban Sprawl and the Cost of Public Services. *Environment and Planning B: Planning and Design*, *30*(4), 503–522. https://doi.org/10.1068/b12847



Submitter Details

Submission Date: 03/05/2023

First name: Ross Last name: Boswell

Prefered method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Seek Amendment

I seek the following decision from the Council

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

The block bounded by Riccarton Rd, Harakeke St, Kilmarnock St and the railway line should be designated as MRZ (Medium-density residential zone).

My submission is that:

It is proposed to designate the block bounded by Riccarton Rd, Harakeke St, Kilmarnock St and the railway line as HRZ (High-density residential zone). Given the heritage value of the memorial to the 20th Battalion and 20th Regiment in Jane Deans Close, such a designation would be inappropriate and disrespectful to the former servicemen and to their descendants.



Submitter Details

Submission Date: 03/05/2023

First name: Logan Last name: Brunner

Prefered method of contact Email

Consultation Document Submissions

Provision: Chapter 13 Central City

Seek Amendment

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area: We oppose all changes to heritage areas.

we oppose all changes to heritage to

My submission is that:

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

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

Provision: Chapter 14 Residential

Support

I seek the following decision from the Council

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

My submission is that:

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

Relevant clause: 14.2.6.

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

Provision: Chapter 14 Residential

Support

I seek the following decision from the Council

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

My submission is that:

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

Relevant clause: 14.2.7.

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

Provision: Chapter 14 Residential

Support

I seek the following decision from the Council

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

My submission is that:

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

Relevant clause: 14.6.2.2.c.iv.

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

Provision: Chapter 14 Residential

Seek Amendment

I seek the following decision from the Council

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

Amend to previously proposed levels or oppose entirely.

My submission is that:

Sunlight access QM.

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

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

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

Provision: Chapter 14 Residential

Seek Amendment

I seek the following decision from the Council

If seeking to make changes to a specific site or sites, please provide the address or identify the area: Amend, reduce proposed area back to current size of 40 houses.

My submission is that:

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

Relevant clause: 14.5.2.3.v and 14.4.2.3.iv (2 clauses as this area is currently covered by two different zones that will merge into MRZ). If wanting to reduce area, refer to 'PC14 Planning Maps 31' under 'Maps' section in submission.

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

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

Provision: Chapter 14 Residential

Seek Amendment

I seek the following decision from the Council

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

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

My submission is that:

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

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

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

Provision: Chapter 14 Residential

Seek Amendment

I seek the following decision from the Council

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

Remove entirely or relax recession planes for buildings in HRZ.

My submission is that:

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

apartment-style buildings.

Relevant clause: 14.6.2.2.b (Clause that dictates that recession planes still apply on parts of buildings above 12 m). Buildings in the HRZ are overly constrained by the rules for recession planes, setbacks, height limits, and building separation. In areas with older sites (e.g Riccarton, Papanui, city centre), the smaller than average site width combined with the aggressive rules means that a 5-storey house is largely not permitted. Given that units taller than 3-stories require additional investments (fire safety controls, lifts), this effectively limits feasible development in some HRZ areas to 3-storeys. Even on sites where the width is equal to the city-wide average width of 20 m, the width of the 5th floor of a building is limited to just 6 m. This reduces the feasibility of building 5-storey units. The rules for buildings in the HRZ are unnecessarily harsh, with the unintended consequence of promoting 3-storey houses over higher-density developments.

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



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Submission Date: 03/05/2023

First name: Nan Last name: Xu

Prefered method of contact Email

Consultation Document Submissions

Provision: Planning Maps

Seek Amendment

I seek the following decision from the Council

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

147A Yaldhurst Rd, Uper Riccarton, Christchurch. 8042

and

147B Yaldhurst Rd, Uper Riccarton, Christchurch. 8042

My submission is that:

Dear Council.

My name is Nan, I am the landlord of 147A and 147B Yaldhurst Rd, Upper Riccarton.

These sites has been changed to medium density land in Christchurch District Plan in 2022, and now it shows on the map is 'Residential Suburban Zone and This zone retains existing District Plan rules'.

I noticed that my neiboughers are all most muti-units, for example: unit1-3 149 Yaldhurst Rd, flat 1,2 151 Yaldhurst Rd, and unit1-3 151A Yaldhurst Rd.

As the New intensification rules will allow buildings of up to three storeys on most sites in cities without any need for resource consent from August 2022, therefore I have make some plans for my properties based on the new law.

However, now the rules changed again, the zone changed from medium desity to Residential suburban zone, all my work and my plans are going to be waste and I believe I am not the only person had bit of plan for our properties based on the 2022 rules. I don't understand that since my neighbors are already living in such a higher dense environment, why these area has to change back to lower desity zone?

In conclusion, I strongly suggest that these area remain on the Medium Desity Residential Zoon because most of our neighours around areunits and flats, they are already in medimum desity living environment and Yaldhurst Rd

is the most busy main road in Christchurch North.
Many thanks
Nan Xu

Christchurch City Council

Our proposed Housing and Business Choice Plan Change (14)

Submitter Details						
Submission Date: First name:	03/05/2023 Christine	Last name:	Whybrew			
Organisation: Heritage New Zealand Pouhere Taonga (HNZPT) Prefered method of contact Email						

Attached Documents

Name	
HNZPT submission on Plan Changes 13 and 14	_
HNZPT submission on Plan Changes 13 and 14 - APPENDIX 1	
HNZPT submission on Plan Changes 13 and 14 - APPENDIX 2	¥



1 May 2023

City Planning Team
Christchurch City Council
PO Box 73012
Christchurch

By email: planchange@ccc.govt.nz

Tēnā koe,

HERITAGE NEW ZEALAND POUHERE TAONGA SUBMISSION ON PLAN CHANGE 13 AND 14 OF THE CHRISTCHURCH DISTRICT PLAN

To: Christchurch City Council

Name of submitter: Heritage New Zealand Pouhere Taonga (HNZPT)

Submitter details

- 1. Heritage New Zealand Pouhere Taonga is an autonomous Crown Entity with statutory responsibility under the Heritage New Zealand Pouhere Taonga Act 2014 (HNZPTA) for the identification, protection, preservation and conservation of New Zealand's historic heritage.
- 2. HNZPT could not gain an advantage in trade competition through this submission.

Submission details

- 3. The specific provisions of the proposal that HNZPT's submission relates to are:
 Please refer to Appendix 1 and 2. We note that the proposed amendments in PC13 appear to be duplicated in PC14. We do not propose to restate all submission points twice, rather that Appendix 1 records HNZPT's position on the relevant provisions of both Plan Changes.
- 4. Our submission is: Please refer to Appendix 1 and 2.
- 5. We have included 9 additional pages.
- 6. We seek the following decision from the Christchurch City Council: Please refer to Appendix 1 and 2.

Submission at the Hearing

7. We wish to speak in support of our submission.

HNZPT comments

- 8. HNZPT understands that Council has been given direction by central government, via the National Policy Statement on Urban Development (NPS-UD) and the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act, to help enable more houses to be built in the city's existing footprint instead of spreading further out. The proposed plan changes are a response to that direction, to ensure the District Plan complies with the legislation. We acknowledge that some of the proposed changes are legal requirements of the new national direction and cannot be influenced by the Council, whereas other changes have greater scope for community involvement.
- 9. The need for more housing is undisputed and HNZPT agrees that many areas within the city are well suited to provide for that need. At the same time, we strongly advocate for robust provisions to be established to ensure that this will not be at the expense of Christchurch's historic heritage.
- 10. Christchurch has a wealth of history which plays an important role in generating a feeling of identity and wellbeing, as well as encouraging intergenerational connection. Intensified development has the potential to adversely impact individual heritage items. The construction of a greater number, and potentially taller buildings close to a heritage structure could result in its heritage values being put at risk. This includes issues associated with construction and potential long-term conservation and liveability problems associated with loss of sunlight, overshadowing and damp. Although development on the actual site of the heritage item may still be subject to resource consent requirements, potentially permitted development on an adjacent property may have as detrimental an impact.
- 11. Council has acknowledged that not all parts of the city are suitable for the level of increased development that is enabled by the Act, and that some areas have qualities which require a more limited or controlled approach. As such, HNZPT strongly supports the City Council's strategy of strengthening the heritage provisions of the District Plan through Plan Change 13, and identifying the inclusion of all heritage items, and heritage areas, as a Qualifying Matter through Plan Change 14. This approach aims to ensure that intensification does not adversely affect Christchurch's most valued heritage whilst being more permissive in areas that can accommodate more intensified development.
- 12. HNZPT supports the proposed inclusion of 11 Residential Heritage Areas, made up of multiple buildings and features that are collectively, rather than individually, of significance to the district's heritage and character. HNZPT considers this will provide an important new layer of protection for these neighbourhoods with heritage values. We encourage robust policies and rules to implement this approach and comment further on these in Appendix 1.
- 13. HNZPT reminds Council of the archaeological provisions of the Heritage New Zealand Pouhere Taonga Act 2014 (HNZPT Act). The accelerated provision of housing and the extension of permitted activities is likely to result in an increase in the number of archaeological authorities that are required, especially in areas of the district with high archaeological values. We would encourage efforts to ensure owners and developers are fully aware of the archaeological authority process and factor it into project planning.
- 14. HNZPT further draws Council's attention to the ongoing issue of demolition by neglect, in which we are seeing the loss or potential unsalvageable state of heritage items due to the lack of maintenance. We would encourage Council to seek ways to recognise and actively address this situation and are happy to discuss or assist in this consideration if required.

Conclusion

- 15. The specific relief sought by HNZPT is set out in Appendix 1 and 2 of this submission. The relief sought is intended to strengthen the proposed provisions as they relate to the management and protection of historic heritage.
- 16. Thank you for the opportunity to submit on these proposed changes. HNZPT requests your consideration of the matters raised and would welcome further consultation.

Ngā mihi,

Dr Christine Whybrew

Director Southern

Heritage New Zealand Pouhere Taonga

Address for service:

Arlene Baird

Heritage Advisor - Planning

Heritage New Zealand Pouhere Taonga

PO Box 4403

Christchurch 8140

Email: abaird@heritage.org.nz

APPENDIX 1 - SUBMISSION OF HERITAGE NEW ZEALAND POUHERE TAONGA ON PLAN CHANGE 13 OF THE CHRISTCHURCH DISTRICT PLAN

HNZPT Ref #	Provision to which submission relates	Support or Oppose	Reasons for submission	Decision sought from Council (Retain / Amend / Delete)
001	Chapter 2 / Abbreviations and Definitions / Definitions / Alteration of a heritage item	Support	HNZPT supports these changes which strengthen and simplify the definition of <i>alteration</i> . We consider this to be beneficial in terms of reducing ambiguity and providing clear and concise guidance for users.	Retain as proposed.
002	Chapter 2 / Abbreviations and Definitions / Definitions / Contributory building	Support	HNZPT supports the inclusion of the definition for a contributory building in relation to heritage areas. We consider the identification and clear distinction between buildings that do and do not contribute to a heritage area will ensure the heritage areas are protected where necessary but not overly restrictive.	Retain as proposed.
003	Chapter 2 / Abbreviations and Definitions / Definitions / Definitions / Defining building	Support	HNZPT supports the inclusion of the definition for a defining building in relation to heritage areas. We consider the identification of buildings of primary importance avoids ambiguity, and affords protection where necessary whilst avoiding unnecessary restrictions to other buildings.	Retain as proposed.
004	Chapter 2 / Abbreviations and Definitions / Definitions / Heritage fabric	Oppose	HNZPT suggests the later fabric referred to in part (b) could be considered as part of the 'later material' included in part (a) so its specific inclusion is not required.	Amend HNZPT requests the removal of part (b): Heritage fabric: in relation to Subchapter 9.3 Historic Heritage of Chapter 9 Natural and Cultural Heritage, means any physical aspect of a heritage item, heritage setting, or heritage area which contributes to its heritage values. In the case of the interior of a heritage item, it

				includes only that heritage fabric which is protected by Appendix 9.3.7.2 Schedule of significant historic heritage for that heritage item. Heritage fabric may include: a. original and later material and detailing which forms part of, or is attached to, the interior or exterior of a building, structure or feature; b. later fabric introduced as part of repairs, restoration or reconstruction; e. b. the patina of age resulting from the weathering and wear of construction material over time; d. c. fixtures and fittings that form part of the design or significance of a heritage item, but excludes inbuilt museum and artwork exhibitions and displays; and e. d. for a heritage item which is an open space, built or other elements independent of buildings, structures or features, such as historic paths, paving, trees, and garden layout. Heritage fabric excludes fabric certified in accordance with Appendix 9.3.7.6 Certification Certificate of non-heritage fabric.
005	Chapter 2 / Abbreviations and Definitions / Definitions / Heritage fabric	Support	HNZPT supports the clarification at the end of this definition, that heritage fabric excludes fabric that has certification as non-heritage fabric.	Retain this section as proposed.

006	Chapter 2 / Abbreviations and Definitions / Definitions / Heritage Professional	Support	HNZPT supports the amendment of the definition of heritage professional, in particular the requirement to have membership of an organisation for heritage professionals such as ICOMOS New Zealand, New Zealand Archaeological Association, or Pū Manaaki Kahurangi New Zealand Conservators of Cultural Materials.	Retain as proposed.
007	Chapter 2 / Abbreviations and Definitions / Definitions / Intrusive building or site	Support	HNZPT supports the inclusion of <i>Intrusive building or site</i> within the District Plan in relation to proposed heritage areas. The identification of buildings or sites that detract from or are inconsistent with the heritage values and significance of heritage areas provides a greater level of flexibility for owners and potential for more appropriate development that could in turn benefit the heritage area.	Retain as proposed.
008	Chapter 2 / Abbreviations and Definitions / Definitions / Neutral building or site	Support	HNZPT supports the inclusion of <i>Neutral building or site</i> within the District Plan in relation to proposed heritage areas. The identification of buildings or sites that neither support nor detract from the heritage values and significance of the heritage area provides a greater level of flexibility for owners and greater certainty for Council when considering applications for development.	Retain as proposed.
009	Chapter 8 / Subdivision, Development and Earthworks / 8.6.1 Minimum net site area and dimension	Support	HNZPT supports the increased minimum net site area for the Heritage Areas specified under additional standards. This reflects a level of assessment resulting in a lot size appropriate to the character and significance of the area.	Retain as proposed.
010	Chapter 8 / Subdivision, Development and Earthworks / 8.9.2.1 Permitted activities –	Support	HNZPT supports the requirement for details of temporary protection measures to be provided to Council's Heritage team for comment at least 5 working days prior to the	Retain as proposed.

	earthworks / P1 Activity Standard		works commencing. This provision will help to mitigate any potential physical effects on the heritage item.	
011	Chapter 9 / 9.3 Historic Heritage / Objectives and Policies / 9.3.2.2.5 Policy - Ongoing use of scheduled historic heritage	Support	HNZPT supports the provision for the ongoing use and adaptive reuse of scheduled historic heritage, which also includes defining buildings and contributory buildings within identified heritage Areas. HNZPT supports the removal of 'recognising that heritage settings and Significant heritage items are potentially capable of accommodating a greater degree of change than Highly Significant heritage items' in part b)i.	Retain as proposed.
012	Chapter 9 / 9.3 Historic Heritage / Objectives and Policies / 9.3.2.2.8 Policy – Demolition of scheduled historic heritage	Support	HNZPT supports the addition of 'and the heritage item would no longer meet the threshold for scheduling' in part a)ii of 9.3.2.2.8. We consider this wording adds a beneficial additional layer of assessment.	Retain point a)ii of 9.3.2.2.8 as proposed.
013	Chapter 9 / 9.3 Historic Heritage / Objectives and Policies / 9.3.2.2.8 Policy – Demolition of scheduled historic heritage	Oppose	HNZPT recommends the inclusion of a new clause in 9.3.2.2.8, requiring that should a heritage item be removed, the setting will be assessed to determine whether it should be retained/rescheduled as an open space or heritage item. In many cases the main physical structure holds only part of the heritage values of an item, particularly where there may be ancillary features or intangible heritage values. We note that this does sometimes occur in practice, e.g. Former Lyttelton Police Station Cells.	Amend HNZPT requests the addition of a new clause in 9.3.2.2.8: vi. Should demolition be approved, whether the setting should be retained/rescheduled as an open space heritage item.

014	Chapter 9 / 9.3.4 Rules - Historic heritage / 9.3.4.1.1 Permitted activities / P1	Support	HNZPT supports the removal of activity specific standard a)ii in 9.3.4.1.1 P1 which we consider to be overly restrictive.	Retain as proposed.
015	Chapter 9 / 9.3.4 Rules - Historic heritage / 9.3.4.1.1 Permitted activities / P2	Support	HNZPT supports the inclusion of activity specific standard a) in activity P2, requiring the provision of a scope of works and temporary protection measures prior to work commencing. This standard provides an essential layer of protection for items during permitted repair works. HNZPT supports the inclusion of activity specific standard g) requiring the provision of a photographic record before, during and after completion. This standard will ensure the recording of information for items during permitted repair works.	Retain as proposed.
016	Chapter 9 / 9.3.4 Rules - Historic heritage / 9.3.4.1.1 Permitted activities / P8	Oppose	HNZPT recommends the proposed activity P8 be amended to a restricted discretionary activity, with Council's discretion limited to the effects on the heritage item or its setting. We consider that the buildings, structures or features in a heritage setting have the potential to contribute to the heritage values of the item, and their alteration through being a permitted activity could have adverse effects on the item. In lieu of all important elements of a setting being clearly identified in the Statement of Significance, which they currently are not, then P8 has the potential to allow inappropriate alterations.	Amend HNZPT requests the removal of P8. HNZPT requests a new restricted discretionary activity: a. Alteration, relocation or demolition of a building, structure or feature in a heritage setting, where the building, structure or feature is not individually scheduled as a heritage item. b. This rule does not apply to works subject to rules 9.3.4.1.3 RD1 and RD2.

				The Council's discretion shall be limited to the following matters: 9.3.6.1 Heritage items and heritage settings
017	Chapter 9 / 9.3.4 Rules - Historic heritage / 9.3.4.1.1 Permitted activities / P12	Support	HNZPT supports the demolition or relocation of neutral or intrusive buildings as a permitted activity, providing flexibility within the Residential Heritage Areas whilst ensuring protection of the more significant buildings.	Retain as proposed.
018	Chapter 9 / 9.3.4 Rules - Historic heritage / 9.3.4.1.2 Controlled activities	Support	HNZPT supports the removal of all controlled activities, with the exception of works to Christ Church Cathedral and the Citizens War Memorial.	Retain as proposed.
019	Chapter 9 / 9.3.4 Rules - Historic heritage / 9.3.4.1.3 Restricted discretionary activities / RD6	Support	HNZPT supports the added protection of the character of Residential Heritage Areas by identifying alterations as restricted discretionary activities under RD6. This will allow for greater consideration of the potential effects of proposed alterations.	Retain as proposed.
020	Chapter 9 / 9.3.4 Rules - Historic heritage / 9.3.4.1.3 Restricted discretionary activities / RD7	Support	HNZPT supports the demolition or relocation of defining or contributory buildings as a restricted discretionary activity, providing scope for consideration of the potential effects of the proposal whilst enabling flexibility for neutral or intrusive buildings.	Retain as proposed.
021	Chapter 9 / 9.3.4 Rules - Historic heritage / 9.3.4.1.3 Restricted discretionary activities / RD8	Support	HNZPT supports RD8 which identifies buildings of more than 5m in high density zones adjacent Residential Heritage Areas as a restricted discretionary activity.	Retain as proposed.

			This allows for greater consideration of the potential effects of neighbouring development.	
022	Chapter 9 / 9.3.4 Rules - Historic heritage / 9.3.6 Rules - Matters of discretion / 9.3.6.4 Residential Heritage Areas - new buildings, fences and walls, and exterior alterations to buildings	Support	HNZPT supports the consultation required in 9.3.6.4 d) and e).	Retain as proposed.
023	Chapter 9 / 9.3.4 Rules - Historic heritage / 9.3.6 Rules – Matters of discretion / demolition or relocation of a defining building or contributory building	Support	HNZPT supports the comprehensive matters of discretion contained in 9.3.6.5 relating to the removal of a defining or contributory building within a Residential Heritage Area.	Retain as proposed.
024	Chapter 9 / 9.3.4 Rules - Historic heritage / 9.3.7 Appendices / Appendix 9.3.7.2 Schedule of Significant Historic Heritage Items	Support	HNZPT supports the scheduling of 44 additional heritage items and 26 additional interiors for protection under the District Plan. We understand that this forms part of an ongoing programme to identify new heritage places and to assess additional building interiors. HNZPT also supports the simplified method of protecting interiors, providing clarity on which interiors are protected and which are not.	Retain as proposed.
025	Chapter 9 / 9.3.4 Rules - Historic heritage / 9.3.7 Appendices / Appendix 9.3.7.2 Schedule of Significant Historic Heritage Items	Oppose	We note one of the column headings on the schedule reads 'Heritage NZ Pouhere Taonga Heritage List number & registration type'. We recommend the word 'registration' be removed as this term is no longer used.	Amend HNZPT requests the column heading be amended: Heritage NZ Pouhere Taonga Heritage List number & registration type

026	Chapter 9 / 9.3.4 Rules - Historic heritage / 9.3.7 Appendices / Appendix 9.3.7.2 Schedule of Significant Historic Heritage Items / Heritage Item Number 1401	Oppose	The Schedule entry for Heritage Item No. 1401, Commercial Building and Setting, Former Public Trust Office, omits the HNZPT list number and category.	Amend HNZPT requests the list number and category be added to Heritage Item 1401: Heritage NZ Pouhere Taonga Heritage List number & type 3128 Category 2
027	Chapter 9 / 9.3.4 Rules - Historic heritage / 9.3.7 Appendices / Appendix 9.3.7.2 Schedule of Significant Historic Heritage Items / Setting Map 629	Oppose	Identification of Heritage Item No. 107, Citizens' War Memorial and Setting on Setting Map 629 shows the item in its previous location. This should be amended to show the current location.	Amend HNZPT requests Setting Map 629 be amended to show the current location of Heritage Item 107.
028	Chapter 9 / 9.3.4 Rules - Historic heritage / 9.3.7 Appendices / Appendix 9.3.7.3 Schedule of Significant Historic Heritage Areas	Support	HNZPT supports the proposed inclusion of 11 Residential Heritage Areas, which are made up of multiple buildings and features that are collectively, rather than individually, of significance to the district's heritage and character. HNZPT considers this will provide an important new layer of protection for these neighbourhoods with heritage values.	Retain as proposed.
029	Chapter 14 Residential / 14.5 Rules – Medium Density Residential Zone / 14.5.3.1.3 Area-specific restricted discretionary activities / RD15	Support	HNZPT supports the inclusion of activities that do not meet one or more of the built form standards for Residential Heritage Areas in Rule 14.5.3.2. as restricted discretionary activities. This will allow for a greater level of assessment and consideration of the potential effects of the built form standards.	Retain as proposed.

030	Chapter 15 Commercial / 15.11 Rules - City Centre Zone / 15.11.1.3 Restricted discretionary activities / RD11	Support	HNZPT supports the inclusion of activities that do not meet Rule 15.11.2.11(a)(ii), (iii), and (vi) in respect to all buildings on New Regent Street, the Arts Centre, and in the Central City Heritage Qualifying Matter and Precinct, as restricted discretionary activities. This will allow for a greater level of assessment and consideration of the potential effects of the built form standards.	Retain as proposed.
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APPENDIX 2 - SUBMISSION OF HERITAGE NEW ZEALAND POUHERE TAONGA ON PLAN CHANGE 14 OF THE CHRISTCHURCH DISTRICT PLAN

HNZPT	Provision to which submission	Support or	Reasons for submission	Decision sought from Council
Ref#	relates	Oppose		(Retain / Amend / Delete)
001	Chapter 6 / General Rules and Procedures / 6.1A Qualifying Matters	Support	HNZPT supports the inclusion of all existing heritage items, settings, and features protected under the District Plan, as a Qualifying Matter. This status allows Council to apply building height or density requirements enabling less development than would otherwise be required to be enabled, therefore affording greater protection of Christchurch's significant heritage.	Retain as proposed.



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Submission Date: 03/05/2023

First name: Blair Last name: Roxborough

Organisation: St George's Hospital

Prefered method of contact Email

Consultation Document Submissions

Provision: Chapter 13 Central City

Support

I seek the following decision from the Council

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

My submission is that:

The Hospital has taken into account the changes proposed by way of PC14 and can work and develop within these provisions. In particular, it supports the change to the building height limits and the removal of the Character Area Notation(13) and the associated matters of discretion (13.5.5.6 over the SP Hospital zoned land.

The hospital supports the removal of the character area overlay and believes given the importance of the facility to the well-being of the community it can operate within the balance of the rules as set out in Clause 15.4.24.3.

Please see the detailed submission attached, which also relates to:

Chapter 13.5.4

Chapter 13.5.4.2.3

Planning Map No.31

Attached Documents Name St George s Hospital PC14 submission attachment St George s Hospital PC14 EMAILpdf

SUBMISSION ON CHRISTCHURCH DISTRICT PLAN

PLAN CHANGE NO 14

SUBMITTER DETAILS:

FULL NAME(S): ST GEORGE'S HOSPITAL

ATTENTION BLAIR ROXBOROUGH

EMAIL: BLAIR.ROXBOROUGH@STGEORGES.ORG.NZ

PHONE: +64 21 911 099

AGENT ON BEHALF OF ABOVE SUBMITTER:

NAME: KIM MCCRACKEN AND ASSOCIATES

POSTAL ADDRESS: PO BOX 2551

CHRISTCHURCH 8140

EMAIL ADDRESS: OFFICE@RGMC.CO.NZ

PHONE NUMBER: 021 363 497

Trade Competition:

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

The specific proposals that my submission relates to are:

- (i) Chapter 13.5.4 Specific Purpose (Hospital) Zone Rules
- (ii) Chapter 13.5.4.2.3 Larger Inner Urban Sites built Form Standards supported
- (iii) Planning Map No. 31 removing the notation of Character Area 13 (CA13) over those properties sought for inclusion within the Specific Purpose (Hospital) Zone (Refer Fig 1 over).

St Georges Hospital is a Larger Inner Urban Hospital (Refer Policy 13.5.2.1.2). The Hospital supports the removal of the Special Character Area over the Hospital Zoned sites fronting Heaton Street/Papanui Road.

PART 1 – GENERAL SUBMISSION

Introduction

- 1. The St George's Hospital site is located at 249 Papanui Road, Christchurch and includes multiple titles. The site comprises approximately 2.9 hectares and includes a range of medical buildings for administration, medical consultants, wards, theatres, laboratories, radiology, oncology and coronary care and sterilisation. The site is bounded by Heaton Street to the north, Papanui Road to the east and Leinster Road to the south. The site directly adjoins residential properties to the west and north. There is vehicular and pedestrian access to the site from all three roads, with the principal entrance to the Hospital for staff, patients and visitors being off Heaton Street.
- 2. The greater part of the Hospital site activity is currently zoned Special Purpose Hospital under the Operative City Plan and includes six properties at 132, 138, 140, 142, 150, 154 and 162 Heaton Street used as part of the hospital activities, both permanent and temporary. The surrounding area contains a mixture of land uses. The area to the west of the Hospital site is dominated by dwellings. The Papanui Road/Leinster Road corner opposite the Hospital contains retail shops and commercial activities in line with the underlying Business 1 Zoning for that site, along with numerous medical and health facilities. The Papanui Road frontage opposite the Hospital site is now dominated by a mix of health facilities and other non-residential activities.

Background

- 3. St George's Hospital was established in 1924. St George's Hospital is one of the largest private hospitals in New Zealand and plays a significant part in the delivery of healthcare in Christchurch and the greater Canterbury region. It is a critical part of the health infrastructure of Christchurch and carries out 25% of all elective surgery in the City. It is also the only private hospital that provides a range of tertiary services ie Cardiac surgery in the South Island.
- 4. The Hospital also plays a very important role in routinely providing backup for the Canterbury District Health Board, principally for specialised services such as cardiac surgery, ICU services, neurosurgery, cardiology and oncology. These are not available elsewhere in the region. In the event of a major natural disaster St George's Hospital is the back-up hospital for the Canterbury District Health Board facilities were they to suffer significant damage reducing its capacity to provide services. It in part fulfilled this role in February 2011.

- 5. While still fully functional, St George's Hospital suffered extensive damage from the earthquakes in 2010 and 2011. The Hospital buildings that remain are structurally safe but liquefaction and ground subsidence left several key clinical buildings out of alignment. In the medium term ramps and steps are being used to maintain operational capability, but the damaged buildings are being replaced. In particular, the earthquake has seen the demolition of the former "heritage building" which contained the reception, administration, staff cafe, medical records and files and the maternity wing, the oncology unit and the underground bunkers containing the linear accelerators were damaged and needs replacing.
- 6. St George's Hospital has now set about a \$125 million redevelopment and replacement of its facilities.

Development History

7. St George's Hospital, working within the constraints of the Operative City Plan has confronted a lengthy consenting history which has made the overall development less efficient and more costly and has in large part been as a consequence of the previous height limits and the Special Character Notation on the Heaton Street properties. In summary this is set out as follows:

(i) RC951568 - Milford Chambers (1995) and RC971390 Hiatt Chambers (August 1997)

In 1995, RC951568 was granted for a medical consulting rooms complex (known as the Milford Chambers). This building was located along the Papanui Road frontage.

In August 1997, RC971390 was granted for a medical consulting room complex (Known as the Hiatt Chambers) and a 42 space car park on the corner of Leinster Road and Papanui Road.

(ii) RC982983 – Ten Year Redevelopment (May 1999)

The 1999 consent provided for the Canon Wilford Wing, consulting suites and a 212 space parking building with two floors of parking below ground level and two floors above ground level. A fifth floor (3rd floor above ground) to the building provided consulting rooms.

(iii) RMA20005324 – Heaton Street Access Relocation (October 2001)

In October 2001, Resource Consent RMAS20005324 was granted for the closure of the main Heaton Street entrance (located at 140-142 Heaton Street) and to establish a new entrance on the adjoining sites (144-146 Heaton Street). The entrance relocation enabled additional on-site parking.

(iv) RMA92006068 - Revised Parking Building Design (November 20016)

The design of this building was changed to provide the consulting rooms in the three levels at the south of the parking structure. The additional parking level increased the on-site parking supply to 200 ground levels spaces plus 341 spaces in the parking building. The design of the parking structure itself was changed to provide eight parking levels via a sloping floor design.

(v) RMA2007930 – Parking Building 9th Floor Extension (July 2007)

This consent provide for addition of a 9th parking level to the parking building. The additional level increased the capacity of the parking building to 341 spaces.

(vi) RMA92010026 – Oncology (Cancer Centre) Unit – Single Accelerator (July 2008) This consent provided for the construction of a new building in the south-west corner of the site for the provision of Cancer Care services. The application sought consent for the operation of one accelerator.

(vii) RMA92012632 - Oncology (Cancer Care) Unit - Second Accelerator Back Up (November 2008)

The consent granted approval enabled a second linear accelerator to operate as a back up to the first accelerator.

(viii) RMA92012632 - Oncology (Cancer Care) Unit - Second Accelerator Full Time (October 2009)

This consent granted approval for the operation of the second linear accelerator in parallel, to the first accelerator rather than as a back up as per RMA92012632.

(ix) RMA92016449 – Oxygen Tank Facility (August 2010)

This consent granted the installation of the oxygen tank located near the Leinster Road site frontage between the Day Surgery and Radiology buildings.

(x) RMA92021759 – Stage 1a New Entrance/'Atrium' and Stage 1bn New 'Cancer Care Suite and Bankers' (April 2011)

This application was for the first stage of the Hospital redevelopment following the earthquakes.

(xi) RMA92022624 – Construct Stages 3 and 4 of the Hospital Redevelopment

This involves two buildings, four storeys containing car parking, operating theatres, intensive care, wards, and servicing (plant, ambulance, stock)

(xii) RMA/2020/2542 – construction of a MIR based linear accelerator/bunker (December 2020).

(xiii) RMA/2021/4340 – Construction of a new clinic building (January 2021)

8. In addition to the above, the Hospital also obtained temporary consents to use the buildings at 150, 154 and 162 Heaton Street for a range of hospital activities now removed.

Purpose of the Submission

9. The Hospital has sought to operate within the Special Purpose (Hospital) Zone provisions of the Operative City Plan although a number of the constraints have impacted adversely on achieving an efficient use of the site, in particular the limit on height (14m) and the provisions of the Character Area (Area 13). The Hospital recognises that it is located in an area which will impact in part on residential activity but is a long and well established facility in the community (and region) and is seeking to ensure adequate opportunity is available for long term development. The position of the Hospital is recognised in the Operative City Plan which noted:

Policy 9.2.3 : Large Scale Medical Health Facilities (Vol. 2, Section 9), Community Facilities and Identity is as follows:

"To recognise and provide for the operation and development of health facilities and hospitals in the city."

The explanation to the policy refers:

"Major government policy initiatives in the health area, and the expanding role of private health services, have had considerable land use effects within the City, and are likely to continue to do so for some time. These effects include actual or proposed release of large areas of strategically important land (for example Burwood, Sunnyside and Templeton) and intensification of activities, building scale and adjoining ancillary specialist services around other facilities) for example, St George's Hospital). The scale of hospital buildings, parking needs, land requirements and the impact of adjacent specialists on residential amenities, particularly residential coherence, have already become apparent. In addition, services and facilities which may traditionally have been provided by the public health sector are now able to be tendered for and provided by the private sector. This change in the provision of services has resulted in a decentralisation of some health facilities away from public institutions to new sites within the City. This also provides an opportunity for the diversification of existing private health facilities."

The policy is intended to ensure hospitals are able to develop with a degree of planning certainty, whilst providing sufficient protection for residential amenity values where they adjoin living areas. To achieve this, the hospitals are specifically recognised in the Plan and subject to clearly defined controls relating to the effects of these facilities and associated activities."

10. This is reinforced in the Policy provisions of PC 14 and in particular Objective 13.5.2.1 – Enabling Hospital Development, Policy 13.5.2.1.1 – Intensification and the recognition of St Georges Hospital as a Larger Inner Urban Hospital.

- 11. The outcome of the above is that St George's is seen as the "hub" of a range of medical and para-medical facilities now located both on-site or generally alongside the St George's Hospital on both Papanui Road and Leinster Road.
- 12. From the Hospital's position this has resulted in the need to obtain a large number of consents in order to undertake development some of which involves the use of additional 'character area' sites owned by the Hospital but located within the Special Purpose Hospital Zone. In particular this has included the use of 144-146 Heaton Street for a new access/car parking, 139 Heaton Street for landscaping and 150, 154 and 132 Heaton Street for temporary consents for Hospital activities.

Summary - Plan Change 14 Plan Provisions - Specific Purpose(Hospital) Zone

13. The Hospital has taken into account the changes proposed by way of PC14 and can work and develop within these provisions. In particular, it supports the changes to the building height limits and the removal of the Character Area Notation (13) and the associated matters of discretion (13.5.5.6) over the SP Hospital zoned land. The hospital supports the removal of the character area overlay and believes given the importance of the facility to the well-being of the community it can operate within the balance of the rules as set out in Clause 15.4.24.3.

I/We wish to speak in support of our submission.

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

Signature of submitter:

De

Date 2 May 2023

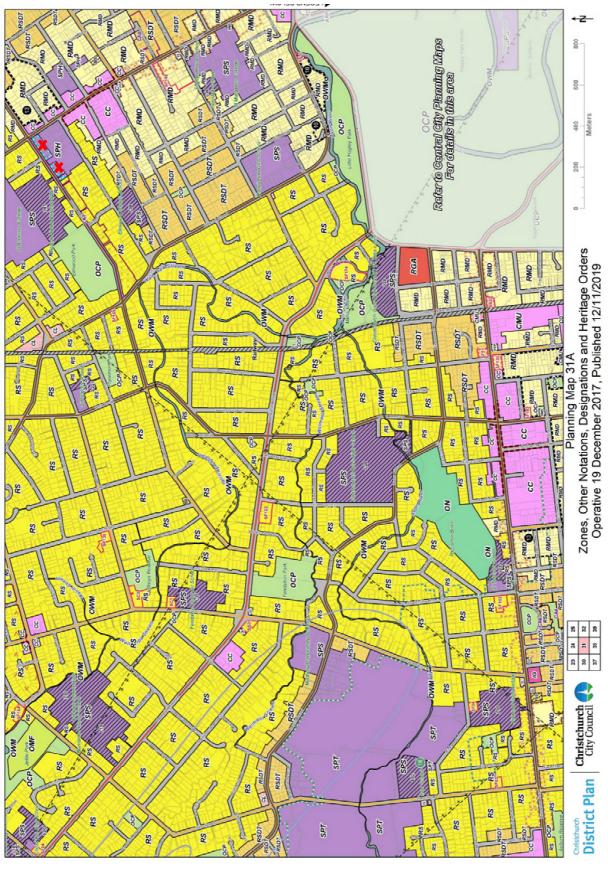


Fig 1 Character Area to be removed

Cui, Aviva

From: Mia <office@rgmc.co.nz>
Sent: Tuesday, 2 May 2023 11:16 am

To: Engagement

Subject: Submission on PC14 - St Georges Hospital

Attachments: 698023_SUBMISSION ON PC14_St Georges_FINAL.pdf

Attached. Please can you confirm receipt.

Kind regards, Mia (for Kim)

McCracken & Associates Limited P O Box 2551, Christchurch, 8140

Phone: Kim 021 363 497 Email: office@rgmc.co.nz



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SII	hmitter	I Jetai	IS.

Submission Date: 03/05/2023

First name: Kevin Last name: Arscott

Prefered method of contact Email

Consultation Document Submissions

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:

76 Manchester St

50 Manchester St and the adjoining property of 11 Allen St

My submission is that:

3 May 2023

To Whom It May Concern,

RE: Submission for proposed amendments to the District Plan

I am the owner of the following properties on Manchester St which are in the Central City Mixed Use Zone:

- 50 Manchester St and the adjoining property of 11 Allen St. This is currently leased to Southbase Construction.
- 76 Manchester St which is a bare site on the corner of St Asaph St and Manchester St. This is currently leased to Wilson Parking for car parking but is a corner development site.

I am a qualified chartered accountant and involved in several businesses. I have invested in the city as a long-term landlord and would like to develop the current properties and overtime, continue to invest in the city. I believe Christchurch has a great future and therefore want to be part of the future investment into the city.

Proposed Amendments to 15.12.1.1 Rules-Central Mixed Use Zone, Permitted activities (c) P5 and P6

I believe that:

- 1. 15.12.1.1(c) P5 and P6-(a) Offices and Commercial services should <u>not</u> only be required ancillary to any permitted activity located on the site.
- 2. 15.12.1.1(c) P5 and P6-(b)(i) individual tenancies should be unrestricted in scale rather than limited to being ancillary and restricted in area to 450 sq.m GLFA; and
- 3. 15.12.1.1(c) P5 and P6-(b)(ii) the total area used for office activities and/or commercial services should be unrestricted and not limited to 450 sq.m GLFA per site, or 450 sq.m GLFA per 500 sq me of land area; whichever is the greater.

The changes noted effectively negates the rule so the Rule should possibly be removed from the District Plan.

Reasons for the Changes:

4. The Central City Mixed Use Zone rule 15.12.1.1(c) P5 and P6 needs to be amended or removed as I believe it is out of date for the current requirements of the city. This is especially so in the south Manchester/St Asaph St area. I don't believe that the rule has been updated since the earthquakes and the city has moved on significantly from then, with very different needs now.

Since the City Centre zone has largely been rebuilt with prime office buildings there is currently strong demand from leasing agents for small office buildings of up to four levels in height in the Mixed Use zone, to support and compliment the emphasis on residential and other forms of businesses in these areas. One positive aspect of the plan change is to allow 32m tall buildings in the zone. However, it will be difficult to lease up taller building unless rule 15.12.1.1(c) P5 and P6 is amended or removed.

- 5. I understand with the intention of the Council to increase working people in the city then smaller office buildings in the Mixed Use zone should be a priority. There is strong demand for businesses to move back into the city, but not to pay prime property rents. These are unaffordable for most small businesses. More small office buildings need to be built. An increase in number of working people in the city during the day and in the evening will support the existing café's, restaurants, and retail areas. The location around south Manchester/ St Asaph St area provide easy walking access to the City Centre zone and available travel access, in and out, of the city to the suburbs.
- 6. The City Centre zone prime office buildings are mainly for large Tier 1 tenancies including legal, insurance and accounting firms requiring large floor plates. These are largely rebuilt following the earthquakes. There is a shortage of space in the Mixed Use zone for Tier 2 tenancies for smaller office buildings, where rents are more affordable. Rule 15.12.1.1(c) P5 and P6(a) restrictions do not help for small office buildings being developed. This will not compromise 15.2.7.1(a)(v) Policy-Diversity of activities for the City Centre zone. Rather by removing the restrictions in rule 15.12.1.1(c) P5 and P6 or removing it altogether, there will be more opportunities for offices and commercial services to support and compliment residential and other forms of businesses in the Mixed Use zone.
- 7. There are limitations of the type of tenant who is likely to be attracted in the Mixed Use zone. For new developments around Manchester/St Asaph St area, there is currently an abundance of apartments in the area and plenty of cafes and restaurants. Some of the cafes and restaurants are struggling to survive. However, it is an appealing area with "Little High" close to St Asaph St. More working people are needed to support what is currently in place. Therefore, small office buildings are required to be built. In Southwark St, professional, service orientated businesses, have been attracted including architects, surveyors, accountants, consultants, etc. These are the type of businesses that will be attracted to new developments and will make the area more vibrant. It's not an area for retail as the foot traffic is low and it's only a small walk into the city centre if a person is looking for retail. Currently Rule 15.12.1.1(c) P5 and P6 is too restrictive and unattractive from an investment perspective to build new developments.
- 8. In the Mixed Use zone an office building should be able to be built if there is other mixed use activities in the area. To restrict a new building by having a combination of activities in the building including part residential, part retail and part office, all subject to rule 15.12.1.1(c) is problematic. If other mixed use activities including residential retail, etc are in the area then a new office building should be able to be developed.
- 9. The bare site at 76 Manchester St lies opposite the EPIC Innovation Centre on Manchester St. This bare site is also just outside the Mixed Use Zone (South Frame). An office building should be able to be built on 76 Manchester which supports the 15.2.9 (iii) Objective ".... that will accommodate technology based businesses".

Rule 15.12.1.1(c) P5 and P6 is too restrictive for this to occur.

- 10. 73 Manchester St is the "One Staff" building. Due to the Mixed Use zone rules it has a combination of two apartments on the top level, offices on two levels and a café and carpark on the ground floor. The new building has been marketed for sell for a couple of years and has not sold. I understand the café is for sell. This is indicative of a very difficult investment market where a quality new building which has a combination of different activities cannot be sold. A sign that the mixed use rules are not working from an investment perspective.
- 11. Around the south Manchester/St Asaph St area there continues to be land that is not developed. This needs to change to attract businesses and working people into the area. This will change if rule 15.12.1.1(c) P5 and P6 was amended or removed, and not restrictive providing greater flexibility for small office building to be developed.

Summary

It is my view that rule 15.12.1.1(c) P5 and P6 is currently too restrictive and is stopping development in the south Manchester/St Asaph St area. Amendments or removal of the rule is required, as detailed in points 1-3 above. This would provide for small office buildings to be developed to accommodate more people working in the Mixed Use zone. This would meet the current demand of smaller businesses moving back into the city but

wanting to be outside the Central City zone. Amendments to remove all restrictions or removing the rule, would allow total flexibility for small office building to be developed in the Mixed Use zone.

I look forward to providing further input as part of the submission if required.



Submitter Details

Submission Date: 03/05/2023

First name: Brian Last name: Gillman

Prefered method of contact Email

Consultation Document Submissions

Provision: Chapter 6 General Rules and Procedures

Support

I seek the following decision from the Council

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

Retain waterbody setbacks and sunlight access as a qualifying matters.

My submission is that:

Section 6.1A - I support retention of waterbody setbacks as a qualifying matter, they are sensitive areas that are not appropriate for intensification of residential development. I support sunlight access as a qualifying matter, as it would allow for greater sunlight access in medium density areas for the benefit of resident's heath and wellbeing.

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:

Accept the amendments to 141.5.2.6 - Height in relation to boundary, 14.6.2.2 - Height in relation to Boundary, 14.15.2 - Diagram D.

My submission is that:

145.2.6 - Height in relation to boundary, 14.6.2.2 - Height in relation to Boundary, 14.15.2 - Diagram D - I also support the revised recession plane requirements for the Medium Density Zone and the application of sunlight access as a qualifying matter, as they would allow for greater sunlight access in medium density areas, for the benefit of resident's health and wellbeing.



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Submission Date: 03/05/2023

First name: Steve Last name: Smith

Prefered method of contact Email

Consultation Document Submissions

Provision: Chapter 1 Introduction

Oppose

I seek the following decision from the Council

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

My submission is that:

Please see the detailed submission attached.

There is so much that I oppose and I make the effort to do it but my time is wasted.

In a nutshell – The Tsunami Management area is based on assumption after assumption with respect to an extremely low probability event occurring. Subdivision restrictions in this area are nonsense. (A 1 in 500 year event, really? Or are we about to be told that cows now cause earthquakes)

The existing recession plane rules in the current District Plan should remain. They allow for intensification without too many negative effects.

More pubic consultation/ discussion is required. Plenty of it went into the current rules and these should not just be thrown out the window under the guise of a "climate emergency" or "housing affordability". There are better ways to tackle housing affordability. The negative effects resulting from PC14 to the people of Chch will far outweigh any miniscule benefits they might have to the world. Chch has gone through too many changes as a result of recent events already. The current DP was designed as a pathway forward. This pathway should not be ripped up and replaced without proper consultation – it is unfair on the people of Christchurch.

That is my submission. I strongly oppose PC14.

Attached Documents Name Steve Smith-email Steve Smith-submission attachment

Cui, Aviva

From: Steve Smith <steve.smith@outlook.co.nz>

Sent: Tuesday, 2 May 2023 9:55 pm

To: Engagement

Subject: RE: Feedback on Our proposed Housing and Business Choice Plan Change (PC14) /

531

Attachments: PC14 submission Stephen Smith.pdf

Hello Aviva

Please see attached. If there is something missing can you let me know.

Regards Steve

Sent from Mail for Windows

From: Engagement

Sent: Tuesday, 2 May 2023 4:16 pm

To: Steve Smith

Subject: RE: Feedback on Our proposed Housing and Business Choice Plan Change (PC14) / 531

Kia ora Steve,

Thanks for informing us of the issue. We really appreciate, the issue has now been resolved.

I am wondering if you still need my help to submit on your behalf? Feel free to let me know how I can help; your feedback is appreciated.

Ngā mihi,

Aviva Cui

Engagement Assistant

Communications and Engagement

Pronouns: she/her



03 941-6844 | 027 367 1828



Te Hononga Civic Offices, 53 Hereford Street, Christchurch

PO Box 73016, Christchurch 8154

ccc.govt.nz



From: Engagement

Sent: Monday, 1 May 2023 11:01 am

To: Steve Smith <steve.smith@outlook.co.nz>

Subject: RE: Feedback on Our proposed Housing and Business Choice Plan Change (PC14) / 531

Mōrena Steve,

Please try our qualifying tool: <u>interacting mapping system</u> that should help address this issue. Please let me know if you have further questions.

Nga mihi, Aviva

Engagement

Communications and Engagement





03 941 8999

From: Steve Smith < steve.smith@outlook.co.nz >

Sent: Friday, 28 April 2023 5:02 pm

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

Subject: Re: Feedback on Our proposed Housing and Business Choice Plan Change (PC14) / 531

Also did you know there are two different CCC interactive maps online relating to PC 14. If I search Google I can get links to two separate PC14 maps which when I search my property 243 Marine Parade one map says it is zoned Medium Density (as it is now) and other shows it as Suburban Transition Zone. I don't know which to believe.

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

Sent: Friday, April 28, 2023 4:06:10 PM

To: Steve Smith <steve.smith@outlook.co.nz>

Subject: RE: Feedback on Our proposed Housing and Business Choice Plan Change (PC14) / 531

Kia ora Steve,

I am so sorry about your unpleasant experience, and I contacted the technical team this morning and solved the problem.

We appreciate that you spent time submitting feedback. Can you please go to the online platform to submit again? Alternatively, I am happy to submit on your behalf if you can please provide some answers below (Due to legislation, there are additional questions for Proposed District Plan):

- 1. Trade competition and adverse effects: could or could not
- 2. **Gain an advantage in trade competition** through this submission: <u>I am or I am not</u> (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).
- 3. Would you like to present your submission in person at a hearing? Yes or No.
- 4. 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). <u>Yes</u> or <u>No</u>.

- 5. Lastly, **demographics 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).
- 6. **Age** group: (under 18; 18-24;25-34;35-44;45-54;55-64;65-79; over 80)
- 7. **Gender**: Male, Female, Non-binary/another gender
- 8. Ethnicity: New Zealand European/ Maori/ Pacific people/ Asian/ Middle East/Other European/Other.

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: Steve Smith <steve.smith@outlook.co.nz>

Sent: Thursday, 27 April 2023 10:33 pm **To:** Engagement <engagement@ccc.govt.nz>

Subject: Feedback on Our proposed Housing and Business Choice Plan Change (PC14) / 531

Hello

I have just spent the last hour writing my submission to PC14 on Council's website. I went to submit it and the site crashed. I am really disappointed and obviously incredibly frustrated.

The whole PC14 process leaves me disheartened. There is so much that I oppose and I make the effort to do it but my time is wasted.

In a nutshell – The Tsunami Management area is based on assumption after assumption with respect to an extremely low probability event occurring. Subdivision restrictions in this area are nonsense. (A 1 in 500 year event, really? Or are we about to be told that cows now cause earthquakes)

The existing recession plane rules in the current District Plan should remain. They allow for intensification without too many negative effects.

More public consultation/ discussion is required. Plenty of it went into the current rules and these should not just be thrown out the window under the guise of a "climate emergency" or "housing affordability". There are better ways to tackle housing affordability. The negative effects resulting from PC14 to the people of Chch will far outweigh any miniscule benefits they might have to the world. Chch has gone through too many changes as a result

of recent events already. The current DP was designed as a pathway forward. This pathway should not be ripped up and replaced without proper consultation – it is unfair on the people of Christchurch.

That is my submission. I strongly oppose PC14. It would be in the correct format but your website is crap which only reinforces my thinking.

Kind Regards Steve Smith

34 Woodside Common, Westmorland, Chch

Sent from Mail for Windows

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



Hello Aviva

This is my submission against PC14.

I will not gain a trade advantage from this submission (probably the opposite but would rather live in a well designed, well planned city with plenty of green spaces, trees and sunlight for everyone - not just those that can afford it)

I would like to present my submission in person but feel it would be a waste of my time so won't bother unless there are others who want to do a joint submission – then I might consider it.

I strongly suspect that going by the difficultly I had in understanding PC14, the implications herewith and issues with making a submission (website crashed losing my submission) then the demographic making submissions on PC14 will not represent a broad cross section of the public.

I oppose all of Plan Change 14 and request that more public consultation/ discussion is required. Changes of this magnitude should not be rushed through on a whim and should be clearly explained to the general public along with the consequences of the changes. Very few people I have discussed the PC14 with have any idea of what is proposed let alone the implications of the changes.

Christchurch has gone through too many changes as a result of the Canterbury Earthquakes already. The current DP was designed as a pathway forward. This pathway should not be ripped up and replaced without proper consultation as PC14 will do – it is unfair on the people of Christchurch.

Plenty of public consultation went into the current rules and these should not be discarded under the guise of a "climate emergency" or "housing affordability". There are other ways to tackle housing affordability which Christchurch City is currently doing by far and away better than any other main centre in NZ. Indeed, we were attracted to move to the city 7 years ago because it was affordable and, when compared to other main centres now, it is still the most affordable by a long way.

The current District Plan rules have been based on good sound planning ideas but PC 14 is not. It will result in incompatible developments in areas that are already stretched for infrastructure. When existing schools, facilities and infrastructure are already at capacity it is not good planning or even good governance to try and squeeze in more dwellings at the expensive of the existing residents of the area. It would be better in all regards to keep the current rules that allow for the current rate of growth, GRADULLY relax these as required in a logical way and build new high density residential subdivisions with appropriate new schools, facilities and infrastructure that cater for the increased density needed.

My main two concerns with PC14 is i) the recession plan change, resulting in loss of sunlight and ii) the increased density of housing proposed which will result in loss of trees and green/open spaces. The current rules work fine (as can be demonstrated by Christchurch recovering from major natural disasters and still having good housing affordability). And the city still has plenty of green spaces, gardens and is a pleasant place to live. The sun in Christchurch, being a lot further south than other centres, is much lower in the sky in winter so recession planes need to stay low to reflect this. It is grossly unfair to expect current Christchurch residents to simply "deal with" the loss of sunlight and

privacy to their home because a developer can make more money building higher and closer and blocking their sunlight.

Christchurch City does not need a PC14, maybe some minor amendments here or there, but blanket changes like these which disregard the rights of existing residents to enjoy the same levels of privacy and sunlight which they should have a right to enjoy are not welcome.

In addition to my two main concerns outlined above I also request that any planning restrictions within the Tsunami Management Area be removed as it is based on a single report containing too many assumptions and with respect to an extremely low probability event occurring. Subdivision restrictions in this area are nonsense.

That is my submission. I strongly oppose PC14.

Kind Regards Steve Smith

34 Woodside Common, Westmorland, Chch

Our proposed Housing and Business Choice Plan Change (14)



Submitter Details

Submission Date: 03/05/2023

First name: Megan Last name: Walsh

Prefered method of contact Postal

Consultation Document Submissions

Provision: Chapter 14 Residential

Oppose

I seek the following decision from the Council

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

My submission is that:

3 story buildings in most residential neighborhoods like mine will cause extremely negative impacts for sunlight and privacy to any neighbors next to them, While allowing multiple dwellings on land sites without adequate off street parking will and already has caused break ins and damage to cars that thieves know will be on the street all the time. This then also causes congestion on the residential streets where higher density housing is happening.

Without adequate green spaces or decent non concreted spaces around these higher density dwellings there is also a total lack of future proofing for flooding and heavy rain drainage and with climate change and the evidence from the last 5 years or so around New Zealand it is obvious that flood future proofing is vital.

Our proposed Housing and Business Choice Plan Change (14)



Submitter Details

Submission Date: 03/05/2023

First name: Joshua Last name: Wight

Prefered method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Seek Amendment

I seek the following decision from the Council

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

My submission is that:

This is split into areas of support and areas to seek amendment

Areas of support:

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

Suggestion: Support

Relevant clause: 14.2.6.

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

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

Suggestion: Support

Relevant clause: 14.2.7.

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

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

Suggestion: Support or amend to increase scope.

Relevant clause: 14.6.2.2.c.iv.

The removal of recession planes for buildings below 14 m within the HRZ, provided the building is within 20 m (or 60% of site depth)

of the front boundary, is a positive change. This is a clear recognition of the idea of 'eyes on the street', where a street is made safer by placing houses closer to the road boundary. With more people living in these houses in high-density neighbourhoods, this benefit will only increase.

Seeking Changes:

· Sunlight access QM.

Suggestion: Amend to previously proposed levels or oppose entirely.

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

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

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

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

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

Relevant clause: 14.5.2.3.v and 14.4.2.3.iv (2 clauses as this area is currently covered by two different zones that will merge into MRZ). If wanting to reduce area, refer to 'PC14 Planning Maps 31' under 'Maps' section in submission.

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

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

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

Suggestion:

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

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

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

Suggestion: Remove entirely or relax recession planes for buildings in HRZ.

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

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

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

Our proposed Housing and Business Choice Plan Change (14)



Submitter Details

Submission Date: 03/05/2023

First name: Robert J Last name: Manthei

Prefered method of contact Email

Consultation Document Submissions

Provision: Chapter 14 Residential

Oppose

I seek the following decision from the Council

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

My submission is that:

Please see the detailed submission attached.

My overall comments relate more specifically to:

- 1. The false and misleading assumptions o which the PC14 is based;
- 2. Why the obvious option of largely accepting the Gov'ts legal requirements as they are-and doing nothing more-was not the CCC's preferred option. To have done so would have preserved maximum flexibility for future adjustments in regulations governing housing, density and commercial activities-as needs became evident. Also, any risk associated with implementing a do-only-the-minimum policy in response to the NPS-UD is virtually non-existnet because of the mandatory 10 years review for any new plan.

My submission deals with the following 7 topics:

A. The assumption of a future housing shortage.

BCCC's about-face in relation to the Govt's original densification proposal

- C. Christchurch Women's Hospital site, including surrounding residential area's recession planes and setbacks
- D. High Density Residential zones within the 4-Avenues.
- E. Developer financial contributions for trees and ground cover.
- F. Transportation improvements and returning the inner city Shutte Bus.
- G. Making Christchurch a Sponge City

Attached Documents	
Name	
Robert Manthei 1 Intro details for PC14 submission	<u></u>
Robert Manthei2 PC14 Submission RJManthei	7

From the "Have your say" form in the Consultation Document.

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

Robert Manthei, 26 April 2023

Submission on Housing and Business Choice Plan Cange 14

I am male, 65-79 years old, of Other European ethnicity

Name: Robert J Manthei

Address: 50 Gracefield Avenue, Central City, 8013

Email: bob.manthei@canterbury.ac.nz

Phone: 03 3669076

This submission is on behalf of myself.

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

Yes, I wish to speak in support of my submission on Plan Change 14. No, if others make a similar submission, I will not consider presenting a joint case with them at the hearing.

My submission is being submitted by email and can be found on the pages below.

R Month

Signature: Robert J Manthei

I am seeking that Council make changes to a specific site or sites

• Yes.

However, my overall comments relate more specifically to

- (1) The false and misleading assumptions on which the PC14 is based;
- (2) Why the obvious option of largely accepting the Gov't's legal requirements as they are—and doing nothing more—was not the CCC's preferred option. To have done so would have preserved maximum flexibility for future adjustments in regulations governing housing, density and commercial activities—as needs became evident. Also, any risk associated with implementing a do-only-the-

minimum policy in response to the NPS-UD is virtually non-existent because of the mandatory 10yr review for any new plan.

O No

Please provide the address or area

This submission relates, in large part, to the effects of Plan Change 14 on the whole of Christchurch. In other parts, it pertains to the inner city area in which I live (the area bounded by the 4-Avenues) and/or the Victoria Neighbourhood area. I have been a member of the Victoria Neighbourhood Association since 1988.

In addition, I will comment on the possible social and environmental impacts of Plan Change 14 on all of Christchurch and Greater Christchurch. Given the urgency (I don't use that word lightly) that we mitigate the impacts of climate change on our lives, this criterion/consideration should be the main driver of any version of PC14. The current one fails in this regard.

My submission deals with the following 7 topics (marked as A to G) (Clearly state if you support or oppose the specific provisions or wish to have them amended. reasons for your view. You should also state the reasons for your views.

- A. The assumption of a future housing shortage
- B. CCC's about-face in relation to the Gov't's original densification proposal
- C. Christchurch Women's Hospital site, including surrounding residential area's recession planes an setbacks
- D. High Density Residential zones within the 4-Avenues
- E. Developer financial contributions for trees and ground cover
- F. Transportation improvements and returning the inner city Shuttle Bus
- G. Making Christchurch a Sponge City

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- G. Making Christchurch a Sponge City

Summary of submission (Robert Manthei, 26/4/2023)

- 1. Searching the mass of documents for details about PC14 was difficult, especially so for members of the public. One would need planning experience and insider knowledge to be able to find all of the information necessary to make a coherent presentation.
- 2. Because of this, CCC should put more emphasis on people's expressed desires and hopes for the future development of the City, rather than judge their efforts based on whether they cite the right documents and regulations.
- 3. The Consultation Document, the key PC14 document for many people, is compromised by the false figure in the first sentence (p.5): "Over the next years it's predicted we'll need more than 40,000 new houses in Otautahi Christchurch to ensure everyone has a place to live," In the supporting material it is clearly stated several times that "... the level of enablement across the city is significant and well exceeds project [sic] demand in both the 30yr long term period and when considered against a 50-60yr or one million population scenario."
- 4. This false statement leads people responding to PC14 to believe that we face an urgent shortage of housing. This deception probably invalidates much of the feedback that will be received, and seriously compromises the integrity of the consultation process.
- 5. Given the projected future excess capacities in both the housing and business sectors, the CCC's response to the NPS-UD and Enabling Housing Act should be to DO NO MORE THAN WHAT IS REQUIRED. PC14 should be a document that (i) outlines minimal changes, and (ii) reminds submitters that any plan must be reviewed within the mandatory 10yr timeframe. Instead, it presents a radical restructuring of the city without a sufficient rationale or data for doing so.

- 6. When the NPS-UD was first released, the CCC vigorously opposed it—on the basis that there was already sufficient housing and business capacity for the next 30-50 years. Curiously, there is no rationale for why they then executed a 180-degree pivot and introduced far more drastic changes in PC14 than were required by legislation.
- 7. By taking a DO NO MORE THAN WHAT IS REQUIRED approach, there would still be many opportunities to develop, enhance and densify the city. The main driver in this approach should be environment considerations and the effects of climate change.
- 8. Matters a minimalist PC14 should deal with include:
 - The 'real' shortage of affordable housing, including rental accommodation
 - Making Chch into a 'sponge city'
 - Halting the use of more greenfield land for subdivisions that are not needed
 - Stopping the removal of mature trees for construction convenience
 - Incentivising and implementing the lowest-cost, easiest to construct, and most flexible public transport system: buses running in large spacing busways

SUBMISSION:

Issue or provision being addressed:	Reasons for my concern:	What I want instead:
A. I oppose the entire basis/assumptions on which the CCC's District Plan Change 14 was based.	A.1 While I understand that the Government has imposed certain nation-wide residential and commercial building standards to increase densification, there is considerable latitude within those standards for Tier 1 cities to adopt individual solutions. The CCC's Consultation document which is meant to describe and justify the proposed changes to our District Plan to meet/deal with the Gov't requirements begins with this false and misleading statement: "Over the next 30 years it's predicted we'll need more than 40,000 new houses in Otautahi Christchurch to ensure everyone has a place to live. This means re-thinking some of our planning rules to allow more housing choice and provide greater opportunities for business development." (p.5, Consultation Document) However, the CCC's own figures (see Table 4; Greater Chch Housing Development Capacity Assessment 30/7/21) project not a deficit of 40,000 new houses, but a surplus of 60,700 over the same time frame!	Why was this deliberately deceptive approach chosen? If there is no adequate explanation, then FURTHER PLANNING AND DISCUSSION OF THE DOCUMENT SHOULD BE HALTED AND THE PLANNING PROCESS RESTARTED—based on accurate projections for future housing needs and population trends. IF IT IS TOO LATE TO DO THAT, THEN THE CCC SHOULD DO ONLY THE

Issue or provision being addressed:	Reasons for my c	oncern:					What I want instead:
	capacity and a s small shortfall o of 580 househo between 11,800	f 867 households ir	of some 48,000 fean Maimakariri shou 5hh/ha is achieved Iding on FUDA der ency within Great	sible households. uld the FUDA's be I. Within Selwyn or nsity yield of either eer Christchurch	At a District levat a density of 1 ver the long term 12.5hh/ha or 15 in the Long Term	vel however, there is a 12hh/ha, but a surplus in there is a shortfall of 5hh/ha.	MINIMUM REQUIRED BY THE GOV'T'S NPS-UD. There is no risk in taking this 'conservative' approach, since whatever current
	Area	Feasible Capacity + FUDA 12/12.5hh/ha	Feasible Capacity + FUDA 15hh/ha	Long term Demand + 15% long term margin	Long term Surplus / Shortfall @ 15hh/ha	Long term Surplus / Shortfall @ 12/12.5hh/ha	version of PC14 is adopted, a review of it must be commenced within 10 years (District Plan Text Amendments, Chap 3, 3.1.c,
	Waimakariri	12,192	13,642	13,059	583	-867	p. 2).
I	Christchurch	101,994	101,994	41,231	60,763	60,763	
	Selwyn	12,208	13,502	25,338	-11,836	-13,130	
	Total	126,394	129,138	79,628	48,344	46,766	
	population we	ata, that <i>"a 'ne</i> enablement be ell exceeding p	eds' driven re- ling considere rojected long-	sponse is not d under PC14 term growth-i	required for 4, is likely to rates. [A foo	r PC14".	
	conservative i driven respon formulated ba	household size se is not requi	e of 2.2 persor ired for PC14. sibility and ach	ns per housel Rather the o _l nieving the mo	hold.'] There otions evalu	based on a more efore, a 'needs' ated have been ate urban form."	FURTHER PLANNING AND DISCUSSION OF THE PC14 DOCUMENT SHOULD BE HALTED AND THE PLANNING PROCESS RESTARTED based on realistic growth and housing projection.

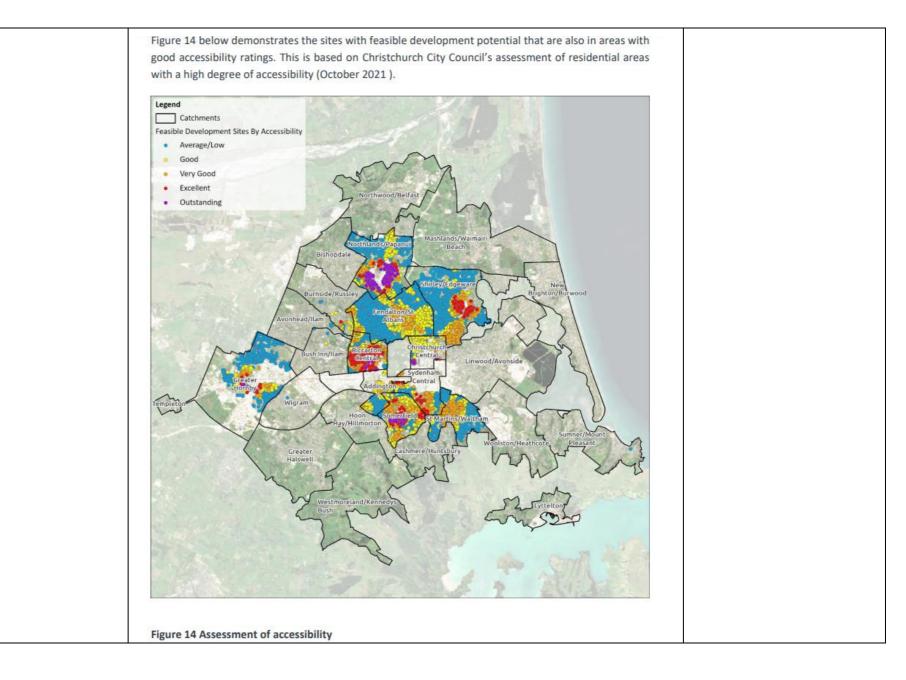
Issue or provision being addressed:	Reasons for my concern:	What I want instead:
	Clearly, the CCC chose to base their planning on a population increase that grossly exceeds projected figures. The resulting Consultation Document then fosters a sense of false urgency about a future housing shortage, probably assuming that residents would readily accept the statement as a 'given' and engage with the details of the radical PC14 overhaul of our city.	IF IT IS TOO LATE TO DO THAT, THEN THE CCC SHOULD DO ONLY THE MINIMUM REQUIRED BY THE GOV'T'S NPS-UD AND CARRY OUT THE MANDATORY REVIEW OF THE PROVISIONS IN 10 YEARS.
	 A.3 The fact that there will be no shortage of housing or business capacity in the City Centre specifically is reiterated in other places throughout the PC14 documents. For example: From Section 32: Part 1 Appendix 1, p.3: "The enablement achieved through the recently legislated Medium Density Residential Standards and application of Policy 3 of the NPS-UD is significantly greater that reported under the 2021 Greater Christchurch Housing Capacity Assessment." [see the figure of 60,700 excess in Table 4, A.1] P.5, same document: "This [From Table 2.2, p. 4] again depicts that the level of enablement across the city is significant and well exceeds project [sic] demand in both the 30yr long term period and when considered against a 50-60yr or one million population-scenario." The same applies to business capacity: [Under Option 4 – Hybrid, from: Policy 34 – City Centre Zone intensification response] "Very significant development capacity enabled; however, it is noted that the latest assessment of business land capacity in the central city [Lincoln University 2022; Business Land Capacity Assessment for Central City] concludes that even the status quo scenario provides more than sufficient plan enabled development capacity to meet forecast demand to 2048." 	FURTHER PLANNING AND DISCUSSION OF THE PC14 DOCUMENT SHOULD BE HALTED AND THE PLANNING PROCESS RESTARTED. IF IT IS TOO LATE TO DO THAT, THEN THE CCC SHOULD DO ONLY THE MINIMUM REQUIRED BY THE GOV'T'S NPS-UD AND CARRY OUT THE MANDATORY REVIEW OF THE PROVISIONS IN 10 YEARS

Issue or provision being addressed:	Reasons for my concern:	What I want instead:
	The data is clear: under a 'do the minimum required' approach to the NPS-UD, there is still a large excess of housing and business capacity over the projected time frame ("Over the next 30 years", Consultation Document).	
	A.4 I can only conclude that the increases in housing and business capacity in the City Centre are an overly literal interpretation of Policy 3 of the NPS-UD that directs: "District plans enable: in city centre zones, building heights and density of urban form to realise as much development capacity as possible, to maximise the benefits of intensification" That there is demonstrated excess capacity in both of these areas without these drastic changes being made seems to have been cast aside. Maximising capacity in the City Centre that is not even needed will impact the city in multiple ways: "90m is higher than any building ever built in Christchurch to date and there is limited demand for residential and office towers; [this height allowance] does not recognise the existing built environment, including the transition in scale to the mixed-use zones and the adjacent residential zones, especially in Victoria Street; [90m enabled] continues to have the potential to erode existing city identity and built urban form by introducing over dominant and potentially visually obtrusive structures distributed sporadically, given lack of demand but less so than the unlimited height optionsTaller building will result in adverse impacts including on important public spaces including Cathedral Square, New Regent Street and Arts Centre, and their heritage values due to the dominant built form. (From Under Option 4 – Hybrid, from: Policy 34 – City Centre Zone intensification response). Why adopt standards that are far in excess of those required, for which there is no demonstrated need and pose so many 'risks' to the City's identity, let alone the long term financial, social and environmental costs associated with them? PC14 seems to be the CCC's urban planning equivalent of Muldoon's THINK BIG.	FURTHER PLANNING AND DISCUSSION OF THE PC14 DOCUMENT SHOULD BE HALTED AND THE PLANNING PROCESS RESTARTED. IF IT IS TOO LATE TO DO THAT, THEN THE CCC SHOULD DO ONLY THE MINIMUM REQUIRED BY THE GOV'T'S NPS-UD AND CARRY OUT THE MANDATORY REVIEW OF THE PROVISIONS IN 10 YEARS. .
	A.5 Because " a 'needs' driven response is not required for PC14", rather " the options evaluated have been formulated based on accessibility and achieving the most appropriate urban form." (From PC14, Section 32 Evaluation, 2.7.3, p.12).	
	Appendix 2, Proposed relationship between building heights within centres and adjoining residential zones, p.41, has a graphic that is meant to show the profile of an appropriate(?) urban form:	

Issue or provision being addressed:	Reasons for my concern:	What I want instead:
	Appendix 2 – Proposed relationship between building heights within centres and adjoining residential zones	
	Urban Form - Centres	
	Assuming this 'pleasing' city profile does indeed represent a desirable form for Christchurch, the same profile could be achieved by reducing the maximum heights in all inner-city sectors by up to 50%, without significantly reducing housing or business capacity under the current PC14 regulations given the projected excess numbers in various reports. So, if the maximum heights were reduced for at least for the Central City Zone (90m to 45m), the Victoria Street zone (45m to 22m), the Special Hospital Zone (Chch Women's Hospital (32m to 20m) and all of the High Density Residential areas within the 4-Avenues (14m to 11m), almost all of the ill effects caused by the higher heights would be mitigated while still providing more than sufficient density to exceed already positive long-term projection figures for housing and business needs. If a need for more capacity unexpectedly arose over the future years, that eventuality could be taken into account in the mandatory 10year review of the adopted plan. This simple change would demonstrate to the Government the City's commitment to densification without adopting extreme requirements that are neither desired or needed at this time.	I want the CCC to cut the recommended heights for all inner-city sectors as suggested (by as much as 50%). The result of this seemingly outlandish PC14 will be reviewed in the 10 year mandatory review period. Additional alterations could more reasonably be made at that time.

Issue or provision being addressed:	Reasons for my concern:	What I want instead:
	 A.6 Although the Chch Central Recovery Plan (CCRP) has been revoked, "PC14 must still have regard to the directions of the CCRP under s74(2)(b)(i) of the RMA" (from Plan Change 14, Section 32 Evaluation; Housing and Business choice – Commercial and industrial sub-chapters evaluation report, 2.1.43). Those directions include statements like the following: 2.1.39 –Under the CCRP, the aim was "the overall design concept for development of a greener, more accessible city with a compact core, more greenspace and a stronger built density". A central part of the CCRP was the concept of a 'frame' with there being three components, "each having its own distinct character and serving to contain the commercial area. It was considered that containing the available land area in this way would address 	The height limits in PC14 should be reduced for all zones: Central City, High Density Residential, and Special Hospital Zone. There is no proven need for the (comparatively radical) heights being proposed.
	the issue of too much development capacity" 2.2.40 – "The Frame allows the Core to expand in the future if there is demand for housing or commercial development".	
	2.1.41 - "lower buildings will become a defining central city feature in the medium and that a lower rise city fits in with the community's wishes and takes into account of the economic realities and market demand for property in the Core."	
	Thus, even though the requirement "that the District Plan must not be inconsistent with the CCRP" has been removed, <i>it must still be taken into account</i> . The CCRP clearly stated that the public's wishes were for lower heights for buildings and that there was ample capacity for expansion. There is virtually no risk of following this more conservative approach to densification, especially since an new Plan must be reviewed within 10 year of its adoption.	
	A.7 From Issue 1 – Policy 3A – City Centre Zone Intensification response, p.65, it is noted that "the latest assessment of business land capacity in the central city [Lincoln U. Business Land Capacity Assessment for Central City, 2022] concludes that even the status quo scenario provides more than sufficient plan enabled development capacity to meet forecast demand to 2048."	PC14 should have reduced height limits on all zones: Central City, High Density Residential, and Special Hospital Zone.

Issue or provision being addressed:	Reasons for my concern:	What I want instead:
	A.8 Stop enabling Greenfield developments:	
	"While new developments, particularly greenfield, continue to be enabled in the neighbouring districts, Christchurch City remains the focal point for economic activity in Greater Christchurch." (From: Section 32: part 1, Appendix 1: CCC updated housing capacity assessment, Feb 2023, p 8). This fact plus the post-earthquake policy of implementing a more compact urban form provided the opportunity—which apparently has not been taken up for "more direct management of new greenfield areas to avoid highly productive land [sic](as required under the National Policy Statement for Highly Productive Land) (lbid, p.8). So, at the same time as PC14 requires a drastic redefinition of the City's density regulations, little is being done to stop the outward spread of large, resource-expensive housing developments on the fringes of Christchurch. These two initiatives (densification within the City and the proliferation of greenfield developments on the fringes) work against one another, with the second cancelling out many of the assumed social, economic and infrastructure benefits accruing from the first. This situation does not make any planning sense.	Whether under PC14 or not, the CCC needs to re-evaluate its role in this matter. I want any additional greenfield land conversion to residential or life-style blocks halted. Any new version of PC14 should immediately restrict the use of such land by developers.
	Based on market evidence, there is good reason to stop the 'developer-driven gravy train' of greenfield developments: "the suburbs that are located closer to the city with good amenity are currently experiencing medium density infill development." (From: New Medium Density Residential Standards (MDRS) Assessment of Housing Enabled, January, 2022, p.37). This assessment reported that MDRS "will become enabled in the majority of the cities residential areas, creating an estimated 'plan enabled' capacity of 222,478 medium density dwellings". These dwelling will occur particularly "in those catchments that are generally one suburb back from the city in areas with good accessibility and amenity. (Ibid, p.39)	
	In other words, there is no 'need' for more greenfield developments under the densification initiative. Figure 14 shows the areas in Christchurch with good accessibility ratings and their potential for development. Note, in particular, areas marked by purple (outstanding development potential), red (excellent potential), and tan (very good potential) dots and their location in relation to the City's outer boundaries. (Ibid, p.39).	



Issue or provision being addressed:	Reasons for my concern:	What I want instead:
	A. 9 The Real Housing Crisis: Affordable Housing for low income residents PC14 says very little that I can see on the topic of providing additional affordable housing to those on low incomes. Densification to the degree being planned could create many new dwellings, but there is nothing I have read in the documentation that shows PC14 will help the persistent and urgent problem of providing sufficient up-to-standard housing for those on low incomes. The concluding comment in Section 32, Part 4: Appendix 9 – Residential Market Demand Report – 2021, p. 19, is useful here: [my highlighting]	PC14 should directly address the ongoing (and growing) problem of a lack of affordable housing.
	"In the meantime, whilst the CBD remains popular there does seem to be a short-term push to areas that are further out from the city. This is likely budget driven, with areas such as Halswell benefiting from these changing market conditions. When looking at what to build, stand alone homes are still what are being predominantly sought out with good garaging options high on the list of required features. The challenge will be to provide these properties at a price point that is considered affordable. One of our local experts noted that three-bedroom, double garage with a bit of a section would fly out the door in the \$580,000-\$650,000 range but she suspected the profits on that would not justify the developers building homes of that size." Perhaps the CCC should assume a greater role in the funding of affordable housing, and stop the planning for densified housing that is already adequate for at least the next 30 years!	
B. The CCC's about face in relation to its original position on the Government's NPS-UD.	 B.1 The CCC opposed Government's NPS-UD when it was first proposed, saying: "One solution will not work for all Less directive policies are preferred. The NPS-UD is likely to require greater intensification than what is enabled in Christchurch's recently-developed District Plan, without considering the lack of demonstrable need for this additional capacity, local priorities specific to Christchurch, and the potential impact on neighbourhood amenity. the removal of all parking requirements will result in negative consequences, especially in terms of parking spill over and access for the disabled and service providers. Community involvement in urban planning needs to be factored into the draft NPS-UD, and more clearly provided for. This includes community involvement in the discussion about intensification, and the need to consider the diversity and character of neighbourhoods." 	Since all of these reasons are still valid, the Council should stop any further work on the proposed PC14 and consider instead how to best fulfil its stated aims by responding in the least disruptive way to the requirements set out in the NPS-UD

Issue or provision being addressed:	Reasons for my concern:	What I want instead:
	Originally, the CCC argued that Chch did not need this level of intensification (see points A.1,2, and 3 above). Curiously, the CCC abandoned its opposition when writing the current version of PC14 and, instead did a 180° about-face by proposing changes that are far more drastic than those required by the NPS-UD. There is no explanation or strategy offered for doing this. Nor is there any detailed discussion listing the social, economic, environmental, and well-being benefits for doing so. This change in stance came as both a surprise and a disappointment to many. People deserve to know what the reasons were for the about-face <i>before deciding on the merits</i>	
C. Chch Women's Hospital site	of PC14.C.1 The proposed height for this site (32m at 4m from the southern boundary—which abuts	The building height should
	directly onto an uninterrupted row of residences on Gracefield Ave; and 20m at 4m from the northern boundary). These heights are excessive and would rob the neighbouring residences of significant sunlight for weeks/months and would impose visual restrictions on their outlook (the view from Gracefield Ave properties could be a 32m wall no more than 10m from the boundary). In combination with the recommended 4m internal setbacks, the negative shading and privacy effects on neighbouring properties would be extreme, in my opinion (see Section 32: Appendix 2, Technical Review of Specific Purpose—Hospitals Provision: 5.2.4). The allowable heights should be no more than half those numbers, that is 16m and 10m, respectively, and the internal setbacks should revert to 10m (as described in District Plan Text Amendments, 13.5.4.1.3, RD13 b.)	be reduced by 50%, from 32 and 20m to 16 and 10m, and the internal set back should be 10m.
	The rationale for the setbacks of 4m suggest the site is not actually a suitable location for an urban hospital rather than setting out the strengths of the site: "(i) It is a long site that has two road frontages and extends across the entire block creating some narrow site width dimensions; (ii) The site adjoins long irregular sections for HRZ boundaries fragmenting the interface to some degree, (iii) the site location is closer to the City Center where higher density development is anticipated." p. 20. The narrow site bisects (not just borders on—like other city hospital sites) a settled residential area by running east to west. This shape would accentuate the negative effects on southern boundary residents because of the limitations in moving taller buildings further into the interior of the section. The compromised section shape can be seen in the figure below (taken from PC14's Interactive map).	I object to a 4m setback. It is too much of barrier to sunshine and privacy when combined with the unnecessary building heights.

Issue or provision being addressed:	Reasons for my concern:	What I want instead:
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	C.2 There would need to be a service road somewhere on the site to enable travel the east-west width of the site. In the past that road was located at the extreme southern boundary (see red line, above) which helped to distance residences on Gracefield Ave from the effects of shading, noise, etc. The same should be considered here, with the proposed 10m building setback then calculated from the northern edge of the through road.	Place service road on the southern boundary (see map of section, above)
	C.3 It is puzzling to me that the taller height proposed (32m) is in relation to the southern boundary of the section. This would maximise the negative effects on the residential neighbours to the south. The northern boundary of the site, on the other hand, would be 20m, and would face the northern neighbours' shady, south-facing sides. Why would planners think that giving more protection to the shady side of neighbouring properties would be preferable to allowing the most favourable regulations to protect those living immediately to the south?	The allowable heights should be reversed: tallest at the northern boundary, lowest at the southern boundary.

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(More generally, recession planes and set-backs)	C.4 The recession plane for the southern boundary on this site should be the same as the current recession plane calculated at a point 10m from the boundary, and the more logical, lower southern building height on this boundary (see discussion in C.3) Because of Christchurch's southern latitude, "the impact of this loss of solar access may also be more significant in Christchurch than other tier 1 cities due to low sun angles, colder ambient temperatures and less powerful diffuse radiation (indirect solar energy)." Thus, merely adjusting recession planes in Christchurch to equalise hours of sunlight with those of northern Tier 1 cities (eg. Auckland) may still not result in equal <i>solar gains</i> for Christchurch." For Christchurch to receive a similar level of solar access to cities in the upper North Island, an alternative recession plane of 50 degrees at a starting height of 3m is recommended. To allow additional flexibility, a variable recession plane would achieve a similar level of sunlight access to other tier 1 cities." Section 32: Part 2, Appendix 35, Sunlight Access Qualifying Matter)	Recession planes should be the same as current ones, and building ht should be the lower one (see C.3). The recession planes for the Christchurch Hospital Site should be adjusted so that the residences on the southern boundary receive the equivalent solar gain as buildings do under Auckland conditions.
	Passive solar gain as a source of home heating becomes more important the further south one lives. It therefore stands to reason that Christchurch residents should not be penalised on this score simply of their geographical location. The computations involved in achieving an equalisation of solar gain sounds complicated, but is well within the expertise of building experts. In relation to the matter of the effect of lower recession planes on densification capacity, "the impact of tighter recession planes is likely to be that they reduce flexibility rather than capacity. There may be certain development forms that would be affected." (Ibid, p.31.	Complexity of computation should not be a reason for avoiding this matter.
D. High Density Residential (within the 4-Avenues)	D.1 I live in the Victoria Neighbourhood area (within the 4-Avenues) which is zoned HDZ. PC14 would allow up to 14m without consent, and up to 32m (10 storeys) with consent. Given that the entire PC14 is based on false projections and that already "the suburbs that are located closer to the city with good amenity are currently experiencing medium density infill development." (From: New Medium Density Residential Standards (MDRS) Assessment of Housing Enabled, January, 2022, p.37), it is reasonable to assume that the same degree densification is occurring in the inner-city residential areas. Therefore, there is no need to increase residential density capacity in these small HDZs. They are already densely populated and most new developments are for multi-unit complexes. The CCC will have data on this trend.	The height restriction and recession planes should remain as they are for HDZs in the inner city. Very little would be gained and serious problems created by adopting the restrictions outlined in PC14.
	Many HDZ sections are small (ours is 397m square) and even considering a height enablement of 14m—let alone up to 32m—on such a small parcel of land would be ridiculous. Building to heights higher than the currently allowed 14m would accentuate the	

Issue or provision being addressed:	Reasons for my concern:	What I want instead:
	problems of shading, loss of privacy, parking and servicing difficulties that already occur in this zone. D.2 In the relatively small total area zoned HDZ, and in the CCMixedUse Zone the 14 – 32m height limit will (and has already) lead to a sameness of housing complexes, usually of two types: (1) multi-story, luxury apartments of 150m² or more; and (2) multi-story, lower cost (but still very expensive), small apts of 90 m² or less. This limited choice of housing constricts the type of people who might purchase them to (i) affluent older singles or couples wanting to experience city living, or (ii) younger singles or couples wanting to experience inner city living before starting a family and moving out to the suburbs. Families with children and lower income residents are increasingly rare in this area, mainly due to the LACK OF AFFORDABLE HOUSING CHOICE. Thus, the inner-city population is not representative of the city as a whole because of restricted choice. Ideally, PC14 would encourage a greater variety of heights and building configurations in the inner city that would enable more low cost housing options to be built without sacrificing density to any great degree. There is already an excellent example of such housing that enriches the inner city due to its uniqueness and commune-like characteristics (see: http://www.peterborough.nz/ The Peterborough Housing co-op). This is a viable alternative to developer-led, profit-driven housing complexes, but it would need to be encouraged and supported by the CCC and Central Government.	Active encouragement and support for more low-cost housing within a 14m maximum height limit within the 4-Avenues.
E. Financial contributions to manage the impacts of effects of development	E.1 I agree with the concluding section of the report on TREE CANOPY COVER / FINANCIAL CONTRIBUTIONS TO ADDRESS THE EFFECTS OF DEVELOPMENT IN RESIDENTAL AREAS ON THE ENVIRONMENT, Section 32: Part 7, 6.1.3, p47. However, there a contradiction in the following statement: "Much of the tree canopy loss is attributed to property redevelopment and intensification. With the enabling provisions of the Medium Density Residential Standards, and especially under the more extreme regulations proposed in PC14, that canopy cover is under threat of further losses. Appropriate mitigation measures need to be put in place to prevent that. The recommended 20% target canopy cover is consistent with the highly modified environment of urban Christchurch and would require a 6.5% increase from the current cover. While Christchurch may be classified as a woodland/shrubland or a temperate forest biome, the residential 25% tree canopy cover target, reflective of such a biome, would not be consistent with the MDRS provision for 20% landscaping area per site. Modelling undertaken by in-house urban designers shows that 25% cover would be very hard to fit with an average multi-unit development	Increase the financial contribution and adopt a 'hard' tree cover target of 25%.

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	without the tree canopies shading the outdoor living areas of the residential units or encroaching on neighbouring properties."	
	The contradiction is this: It is indisputable that tree canopy contributes greatly to urgently needed climate mitigation goals, and yet multi-unit regs are such that they compromise the effective implementation of a financial contribution levied on developers. PC14 should be more aggressive on what is required (i.e., a larger contribution and a tree cover target of 25%, not 20% of the MDRS provision for landscaping per site. Anything less is merely empty 'aspirational' talk that will result in little change and a further reduction of tree canopy cover city-wide.	
	E.2 It is important to keep as much cover (mature vegetation, especially trees) on the site being developed as possible. Thus, building sites should not be allowed to be scraped clean of all vegetation prior to commencing construction. Nevertheless, this often happens and the financial contribution is then used to "plant trees [elsewhere] on Council-owned land" (Consultation Document, p22). The result is a growing area of the City that is denuded and pockets of new 'forest' being planted far from the busy areas of the City—precisely the places where such cover is needed. This is a 'never win' policy for the City and should be immediately reversed.	Require mature vegetation and trees to be kept on new building sites.
	E.3 The idea that "this plan change and in other non-regulatory ways—[will] ensure that green spaces and tree canopy can be retained as much as possible, while enabling more housing choice for our residents" is illusory (Consultation Doc, p.19). Clearing building sections allows the developer to design and construct the simplest of housing solutions: the choice lies with the developer not the resident. Building quick, easy, endlessly repeated units versus having to incorporate trees and other site features into a unique, site-specific design is the equivalent of favouring boring sameness and easy profits over tailoring solutions to fit different sites. I choose the latter, especially for environmental concerns.	Require developers to design 'around' a site's unique features, including retaining mature trees and vegetation.
F. Transport improvements	F.1 1. In the introduction to the City Spine Transport Corridor Planning document it says that "Planning is underway for Ōtautahi Christchurch to cater for a population of one million people, over the long term" and that the main spine of the City's transport corridor will connect the north to the west and run through the City. (From Section 32: Part 2: Appendix 45, QM-City Spine Transport Corridor Background Information.)	Begin now to establish a Street Running Large Spacing Busway system of public transport. Start now and add to it as needed. Light rail is by far too expensive an option at this

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	This population 'guesstimate' is useless for planning when actual projections for Chch suggest Greater Chch [my emphasis] will have 621,00 people in 2038 and 653,000 in 2048 (from: Canterbury Well-Being Index: canterburywellbeing.org.nz/our.population/). There is no certainty that Chch will ever reach 1,000,000 residents given future uncertainties in relation to epidemics, an aging population, natural disaster, dropping fertility rates worldwide and other unforeseen events/factors, including climate change events.	time and will only increase dramatically over time
	Therefore, future public transport planning should, in my opinion be more present and reality focussed. Planners need to adopt a 'do-something-now' mentality, choose a solution that is relatively low cost, and one that retains maximum flexibility to deal with changing needs, demands, residential solutions, etc. Prioritising Mass Rapid Transit (MRT) fails on all three of these counts. It is hugely expensive to build, involves a massive disruption to the environment to establish and results in a fixed-route solution to what will likely be a changing set of variables.	
	The most sensible and affordable option for Christchurch would be to opt for either a bus system involving a large spacing busway, or a bus system utilizing a corridor running system. Both are described in Creating What Matters for the Future Generations. Greater Chch Public Transport Futures, MRT Interim Report –18 June 2021 (final). Of these two systems the set-up costs are vastly lower than those for MRT and significantly lower than for the large spacing busway. It would make sense for the City to pursue the 'large spacing busway' option and build on the work that has already gone into establishing a 'city spine transport corridor'. The key is to build the cheapest, quickest, most flexible system and then incentivise people to use it.	
(The Inner-City Shuttle bus service)	F.2 In relation to 'walkability' and/or accessibility of services in the inner city, the CCC in consultation with ECAN should <i>immediately</i> restore/bring back the 'Shuttle' bus service (whether the service is free or 'gold coin' matters little). This service would help solve parking problems, traffic congestion by giving visitors and more people living within the 4-Aves an alternative to using their cars to move around the city, and it would extend the walkability distances described in PC14.	Reinstate the inner city Shuttle bus immediately.
	Previously, the Shuttle was heavily and happily used by a variety of people and the same would occur now. Several months ago the CCC made an astonishing decision to spend \$50m on 5000 more seats for the new stadium, pushing the capacity to 25,000. Given that the stadium will be used for less than 26 occasions per year that in theory might seldom need anywhere near the stadium's seating capacity, this expenditure was daft. The same amount of money could be used to fund the 'Shuttle' for almost 28 years (using an estimate	

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	of \$1.8m per year operating cost; two years ago, the estimate was \$1.5m per year). The Shuttle would be used daily by several thousand people, year around. Which expenditure is the most sensible and better facilitates the functioning of a successful, environmentally sound City?	
G. As part of an immediate strategy to alleviate wastewater system constraints and mitigate flooding problems, Christchurch should be transformed into a 'Sponge City'.	G.1 Water infrastructure capacity has been exceeded by demand (due to housing densification) in some parts of the city (Consultation Doc, p 17). One partial solution would be to lessen the amount of run-off water in the current infrastructure: pipes and pumping stations. Clearly, as the city's development proceeds, "the more hard surfaces we build, the more stormwater we need to drain Even if the way we've built our cities and the stormwater system could keep up with big storm events – to be clear, they cannot – the network of basins and pipes is aging. With age, the system's capacity to capture stormwater significantly declines." (see: The Spinoff, Welch, Timothy, We need 'sponge cities' to avoid future flooding disasters. Science, January 32, 2023).	
	A relatively simple, inexpensive and environmentally sustainable solution to this problem is to increase the city's sponginess. This involves using 'water sensitive urban design' to incorporate such things as "green roofs, rain gardens and permeable pavements to absorb and filter water. Better catch systems hold rainwater where possible and reuse it. More green space and trees are also incorporated into street and neighbourhood designs. The sponge city concept, and ideas about letting nature handle stormwater, don't have to be extravagant or expensive. They can be as simple as planting more trees and greenery, using less pavement for driveways or more porous cement for car parks." (The Spinoff, Welch, Timothy. We need 'sponge cities' to avoid future flooding disasters. Science, January 32, 2023).	Any future version of Plan Change 14 should incorporate regulations mandating 'Sponge city' concepts, no matter what the final density targets become.
	As an example of how to begin, tree site coverage on residential developments should be increased substantially and follow the planting guidelines set out in Muerk's paper in Section32, Part 7, Appendix 2: "Tree Canopy Core Benefits".	Increase tree coverage on residential and commercial sites substantially.
	In an international comparison of seven cities' 'sponginess', Auckland "came out top with a 35% sponge rating – largely thanks to its stormwater systems, many golf courses, green parks and good-sized residential gardens."(from: Kim Harrisberg, What are 'sponge cities' and how can they prevent floods? https://climatechampions.unfccc.int/what-are-sponge-cities-and-how-can-they-prevent-floods/). Christchurch should set a sponginess rating target of 35% to match Auckland's.	The CCC should set a sponginess rating of 35%, the same as Auckland's.